

Date: April 29, 2026

To: Senate Committee on Environment and Agriculture

Re: Letter of Information on S 2531

Dear Senate Committee on Environment and Agriculture,

The Carton Council is composed of four leading manufacturers of food and beverage cartons – the gable-top and aseptic cartons that are used to package food and beverages. Our members, Elopak, Novolex, SIG, and Tetra Pak, formed the Carton Council in 2009 to deliver long-term collaborative solutions to divert valuable food and beverage cartons from the landfill. Through a united effort, the Carton Council is committed to building a sustainable infrastructure for carton recycling nationwide and works toward its goals of increasing access to recycling, as well as recycling of, cartons throughout the U.S. Currently, cartons have achieved 63% household access to recycling nationally. As of April 2026, household access to carton recycling in Rhode Island is 100%.

Food and beverage cartons are a packaging option with an excellent environmental profile used to hold a variety of products. Both gable-top and aseptic cartons are made primarily from high-quality paper fiber. In addition to renewable fiber, cartons contain thin polymer layers and, in shelf stable (aseptic) cartons, a small amount of aluminum. These multiple layers allow cartons to safely store their contents for long periods of time, helping to reduce food waste and associated environmental impacts. They do not prevent the package from being recyclable.

Cartons are recycled in one of two ways:

- At a full carton recycler where the entire carton, including the thin polymer layers and any aluminum, is turned into sustainable building products.
- At a recovered fiber paper mill, the extracted fiber is used to create new paper products such as tissue, toweling, and printing and writing paper or other paper-based packaging such as coffee cups.

Fiber recovered from recycled cartons saves precious natural resources in the making of new paper-based products and sustainable building materials. According to [US EPA](#), one ton of paper made from recycled fibers is estimated to conserve:

- 7,000 gallons of water
- 17 to 31 trees
- 4,000 kWh of electricity
- 60 pounds of air pollutants

By altering the definition of recycling and prohibiting construction of chemical conversion technologies within the state, the Carton Council is concerned that S 2531 will limit market opportunities to access high-quality, food-safe recycled polymers.

According to ICIS Mechanical Recycling Supply Tracker, food-grade resins currently represent only 10 percent of the global annual capacity of recycled polymers of more than 45 million metric tons.¹ In the context of EPR performance targets, ecomodulation bonuses, and future postconsumer resin content mandates, non-mechanical plastic recycling (chemical conversion technologies) may be a necessary supplemental source of recycled plastics for safe, food-contact applications. This is because non-mechanical recycled plastics comply with the same U.S. FDA food contact regulations as their virgin polymer counterparts do.

Like any emerging technology, non-mechanical plastic recycling requires thoughtful implementation. We believe non-mechanical plastic recycling benefits from robust standards and oversight and should be deployed with appropriate safeguards.

The Carton Council is dedicated to building strong, sustainable recycling infrastructure and end markets. Over the past 15 years, the Carton Council has proactively invested over \$20,000,000 in recovery facility sortation technology, emerging and established recycling end markets, and community education necessary to drive the system forward. Our comments are offered in this context.

¹ <https://www.recyclingtoday.com/news/icis-rampup-food-graded/>

We appreciate the opportunity to suggest amendments to S 2531 and look forward to continuing to engage with the Committee. The Carton Council is available and ready to provide any data needed to help make decisions beneficial to the recycling system in Rhode Island and continues to expand partnerships with public and private entities to further carton recycling. We look forward to the opportunity to discuss appropriate amendments with you.

Please don't hesitate to contact us for any reason.

Sincerely,



Jordan Fengel
Executive Director
Carton Council