



April 30th, 2025

Rhode Island House Environment and Natural Resources Committee

Re: Senate Bill 939 – Extended Producer Responsibility for Packaging and Paper Act

The Consumer Brands Association appreciates the opportunity to comment on Senate Bill 939 to improve recyclability and promote sustainable end-of-life solutions for packaging materials in Rhode Island. As the voice of a \$2.1 trillion industry that touches every American household daily, we remain deeply committed to advancing policies that further circularity goals, strengthen recycling infrastructure, and deliver measurable environmental benefits.

Senate Bill 939 provides an important opportunity to revisit and reaffirm the principles that our member companies have collectively established to guide the development of effective extended producer responsibility (EPR) legislation. These eight principles, developed through a comprehensive, multistep workgroup process, reflect the consensus of regulatory, sustainability, and state affairs leaders across our industry.

While Senate Bill 939 reflects a shared commitment to improving recycling outcomes, it does not fully align with the core principles that define an effective and sustainable EPR program, potentially limiting its environmental impact and creating unintended challenges for consumers and businesses. These principles include:

1. **Promote Uniformity:** Standardize recycling programs across a state, region, or nationally.
2. **Fix the System:** Improve the underlying recycling system to deliver strong environmental outcomes, not simply layer additional funds on to an existing system.
3. **Base on Data:** Be based on accurate data and science, including a needs assessment, with clear financial and performance targets over a specified period of time.
4. **Embrace PRO:** Allow for an industry funded and run producer responsibility organization (PRO) to assess fees on packaging and determine where/how those funds are spent and manage the system, if applicable.
5. **Funds Only Recycling:** Dedicate new funds raised for recycling improvements solely to recycling, not to government general funds or unnecessary administrative costs.
6. **Bring Everyone to the Table:** Develop a system from a wide array of stakeholders, including state, local, and federal government, packaging suppliers, the consumer goods industry, and the waste and recycling industry.
7. **Source Variety of Funding:** Include more than one source of funding, which should be additive and target specific challenges in the recycling value chain. No single funding source should replace or supplant other funding sources.
8. **Account for Materials:** Apply to and account for a range of material types in the waste stream.

Consumer Brands is supportive of the goal of making recycling more effective and equitable for all Rhode Islanders. However, we respectfully note that the structure proposed in Senate Bill 939 diverges from these foundational principles in several critical ways. Rather than seeing these as fundamental flaws, we encourage policymakers to view them as opportunities to strengthen the bill by realigning it with the proven components of successful EPR systems.

Consumer Brands welcomes the opportunity to work collaboratively with lawmakers and stakeholders in Rhode Island to align Senate Bill 939 with these core principles. By doing so, we can ensure the legislation reflects a shared vision: one that promotes environmental progress, economic practicality, and long-term program integrity.

Thank you for the opportunity to reiterate our significant concerns with Senate Bill 939. Please reach out to Greg Costa, gcosta@consumerbrandsassociation.org, with any questions.

Respectfully,

Greg Costa

Senior Director of State Affairs
Consumer Brands Association