



February 29, 2023

By Email

The Honorable David A. Bennett
Chair, House Committee on Environment and Natural Resources
State House
Providence, RI 02903

RE: Just Zero Supports House Bill 7357, An Act Relating to Health and Safety — High Heat Waste Facility Act

Dear Chair Bennett:

Thank you for the opportunity to provide testimony regarding House Bill 7357, the High Heat Waste Facility Act. **Just Zero strongly supports House Bill 7357.**

Just Zero is a nonprofit organization working in Rhode Island and across the country with communities, policy makers, and others to implement just and equitable solutions to climate-damaging and toxic production, consumption, and waste disposal practices. We believe that all people deserve Zero Waste solutions with zero climate-damaging emissions and zero toxic exposures.

House Bill 7357 would protect Rhode Island communities, our environment, and our climate from facilities that burn waste or use high temperatures to break down waste or plastic. This bill would prohibit the issuance of any permit or license for the construction or operation of a new incinerator, gasifier, pyrolyzer, “advanced recycling” or “chemical recycling” facility, or any other facility that exposes solid waste, recyclable materials, or plastic to temperatures above 400 degrees Fahrenheit. This bill would also help put an end to attempts by the petrochemical and waste industries to carve out legal loopholes that open Rhode Island’s doors to dangerous waste- and plastic-burning facilities.

Any process that uses heat to break down solid waste or plastic is necessarily toxic and climate-damaging. Waste incinerators emit more nitrogen oxides, mercury, lead, and climate damaging gases than coal-fired power plants.¹ Gasification and pyrolysis pose the same toxic and climate-

¹ See The New School, *U.S. Municipal Solid Waste Incinerators: An Industry in Decline* 37 (2019), https://www.no-burn.org/wp-content/uploads/2021/03/CR_GaiaReportFinal_05.21-1.pdf.



damaging risks.² When used to break plastics down into plastic-derived fuels, hydrocarbons, chemicals, and toxic waste byproducts, technologies including gasification, pyrolysis, solvolysis, and others that fall within the umbrella of “advanced recycling” or “chemical recycling” likewise release climate-damaging gases and dangerous toxics like lead, mercury, dioxins, benzene, and styrene.³ Worst of all, incinerators, gasifiers, pyrolyzers, and “advanced recycling” facilities are all disproportionately located in communities of color and low-income communities.⁴

And yet, the petrochemical industry continues to push lawmakers across the country, including here in Rhode Island, to pass legislation that carves out loopholes for dangerous technologies that use heat to break down plastics into fuels and chemicals under the guise of so-called “advanced recycling.”⁵ These loopholes would allow high-heat facilities to evade commonsense regulations that empower communities and protect them from hazards associated with solid waste facilities.⁶ This “advanced recycling” lobbying campaign has a single goal: to keep us hooked on a dangerous cycle of making and burning as much single-use plastic as possible.⁷

Meanwhile, we learn more and more every day about the toxic truth behind the “advanced recycling” myth. A recent investigation found that “advanced recycling” facilities that turn plastic into fuel can create a one-in-four lifetime cancer risk for those forced to live nearby.⁸ And a 2023 study from Department of Energy scientists concluded that high-heat “advanced recycling” technologies cost more, require more energy, and pose greater environmental risks than producing virgin plastics from fossil fuels — which is itself a dangerous, toxic, and climate-damaging process.⁹

Toxic, climate-damaging high-heat facilities that burn trash or turn plastics into fuels, chemicals, and toxic waste will not help address plastic pollution. They will only deepen our dependence

² Neil Tangri & Monica Wilson, Global Alliance for Incinerator Alternatives, *Waste Gasification & Pyrolysis: High Risk, Low Yield Processes for Waste Management* 9 (2017), <https://www.no-burn.org/wp-content/uploads/Waste-Gasification-and-Pyrolysis-high-risk-low-yield-processes-march-2017.pdf>.

³ NRDC, *Recycling Lies: “Chemical Recycling” of Plastic is Just Greenwashing Incineration* 6 (2022), <https://www.nrdc.org/sites/default/files/chemical-recycling-greenwashing-incineration-ib.pdf>.

⁴ See Kevin Budris, Just Zero, *Loopholes, Injustice, & the “Advanced Recycling” Myth* 28–33 (2022), <https://just-zero.org/wp-content/uploads/2022/12/2022-12-14-Just-Zero-Advanced-Recycling-Report.pdf>.

⁵ *Id.* at 15–21.

⁶ *Id.*

⁷ *Id.* at 7–14.

⁸ Sharon Lerner, Pro Publica, *This “Climate-Friendly” Fuel Comes With an Astronomical Cancer Risk*, Feb. 23, 2023, <https://www.propublica.org/article/chevron-pascagoula-pollution-future-cancer-risk>.

⁹ Taylor Uekert et al., *Technical, Economic, and Environmental Comparison of Closed-Loop Recycling Technologies for Common Plastics*, ACS Sustainable Chem. Eng. 2023, 965–978, <https://pubs.acs.org/doi/10.1021/acssuschemeng.2c05497>.



on single-use plastics.¹⁰ Nor will these dangerous facilities help extend the life of Rhode Island’s central landfill. They will only subject Rhode Islanders to toxic pollution, heightened cancer risks, and climate-damage.

Burning, melting, or boiling waste or plastic are toxic false solutions intended to maintain the status quo. House Bill 7357 will allow Rhode Island to build on its progress toward reducing and diverting waste without resorting to these false solutions. Just Zero urges you to protect Rhode Island communities and our climate by supporting this bill.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Budris".

Kevin Budris
Deputy Director
Just Zero

¹⁰ See Budris, *supra* note 4, at 7–14.