

Testimony of Bree Dietly to the
House Committee on Environment and Natural Resources in Opposition to H.8312

June 5, 2024

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

RE: H-8312 – An Act Relating to Health and Safety – Beverage Container Deposit Recycling Act

Dear Chairman Bennett and Committee Members:

I am writing in opposition to House Bill 8312 on behalf of the American Beverage Association and the Rhode Island Beverage Association.

Our Employees and Engagement

Rhode Island Beverage Association members produce and distribute a wide array of non-alcoholic beverages through a network of local bottlers who live and work in the State. Our industry provides jobs to more than 500 employees in Rhode Island; these jobs are some of the best paid, highest benefit jobs available in communities to employees with and without college degrees, and many of them are union jobs. We are proud of our employees and how they and the companies they work for are involved in and give back to their communities.

The non-alcoholic beverage industry plays an important role in advancing the circular economy. Our packaging is specifically designed and optimized for recycling. We design PET bottles and aluminum cans that are 100% recyclable, have a high commodity value and, when collected and recycled, can become new bottles and cans. The industry also has invested in local and regional recycling infrastructure for more than 40 years.

The companies have also made commitments to collect and recycle packaging waste, to incorporate more recycled content into our PET bottles, and to reduce the amount of new plastic in our bottles.

At a national and local level, we are working to get every bottle back to meet these ambitious goals and support a circular economy for our beverage containers. In 2019, the beverage industry launched Every Bottle Back, a commitment with leading environmental and recycling groups to invest \$100 million in improvements to collection systems. This investment will reduce new plastic use by increasing collection of the industry's valuable bottles so they can be remade into new ones. More information can be found at <https://everybottleback.org>.

Advocacy for Better Collection Policies and Shortcomings of the Bill

In pursuit of these commitments, the beverage industry supports improved collection policies to increase the quantity and quality of collected and recovered material. Our priority is to focus on well designed Extended Producer Responsibility (EPR) programs which serve to fund recycling collection programs that are effective, efficient, and convenient for consumers. We developed a set of producer responsibility principles based on best-in-class EPR systems and we are working to advocate for systems based on these principles across the country, most notably supporting the recent passage of the EPR law in Minnesota.

We also participated in the Plastic Bottle Waste Commission and, as we articulated in our exit report, were disappointed that the Commission was unable to take a more comprehensive look at materials recovery across multiple product and material lines (*e.g.*, a well-designed EPR system).

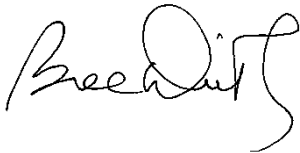
The proposal before us today would establish a beverage container deposit system, but the bill needs extensive work to resolve conflicting language and schedules, extraneous language that does not relate to a deposit program, flawed definitions, and performance targets that are unrealistic and, in some cases, inadequately defined.

We are concerned that the focus of a deposit system is too narrow to achieve the broader goals Rhode Island needs to achieve to preserve landfill space and promote a circular economy. A deposit system takes on only a small portion of these materials, requiring the establishment of an entirely new collection and processing system, and imposing high costs.

Conclusion

We are eager to work with this Committee and other stakeholders to achieve the goal of building upon Rhode Island's existing recycling system to achieve strong environmental performance and high levels of consumer satisfaction and participation. Our preference is to ensure that all consumer packaging and paper are collected at higher rates through systems funded and overseen by the producers, and then returned for use in new products. A deposit system is only a small step in that direction and this bill is not workable as a starting point for such a system and we must therefore oppose it.

Very truly yours,

A handwritten signature in black ink, appearing to read "Bree Dietly". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Bree Dietly, Principal
Breezeway Consulting LLC