

May 5, 2023

Joint Environment and Natural Resources Committee
State House, Room 216
Augusta ME, 04333

SUBJECT: LD 1660/SP 665 – An Act to Provide That Advanced Recycling Facilities are Subject to Solid Waste Regulation and That Advanced Recycling Does Not Constitute Recycling - **OPPOSE**

Dear Chair Brenner, Chair Gramlich, and Esteemed Members of the Joint Committee:

The Plastics Industry Association (PLASTICS) is the only national trade association that supports and represents the entirety of the plastics supply chain, representing the 6th largest manufacturing industry and nearly one million workers across the United States. Since 1937, PLASTICS has been working to make its members and the industry more globally competitive while advocating for an increase in recycling and sustainability. Thus, PLASTICS has a specific interest in advanced recycling technologies and opposes LD 1660/SP 665, which would prohibit advanced recycling facilities and their technologies from being built and utilized in Maine. To elaborate, please consider the following:

1. **PLASTICS strongly supports efforts to ensure that greater amounts of our post-use packaging materials, especially plastics, are recycled and converted into feedstocks for new plastics and other useful products.**

Plastic materials are highly valuable materials that play an important role in the modern economy. They provide sustainability benefits versus alternative materials and will continue to play an important role in helping society mitigate greenhouse gas emissions.¹ Advanced recycling is a necessary and essential complement to mechanical and organic recycling technologies in order to improve the recycling rate, reduce plastic waste, and increase the amount of recycled plastic in commerce.

2. **Advanced recycling technologies are critical to meeting plastic recycling and recycled content demands.**

As the economy becomes more circular, there is growing demand to increase plastic recycling as well as recycled content in products, and advanced recycling is critical to meeting this demand. Advanced recycling technologies can reduce environmental impacts associated with use of virgin natural resources—that is, raw material extraction, refining, and consumption—by producing fully circular outputs (polymers, monomers, intermediates, and other materials).²

¹ A recent study published by PLASTICS determined that “scientific life cycle assessments of plastics and alternative materials find that plastics tend to have lower carbon footprints, making them the more sustainable option among current materials in a number of applications.” See Green, Kenneth, *Plastics and Sustainability* (Oct. 2021), p.2, available at <https://2z2uy32ofddf3z9ep91ninb4-wpengine.netdna-ssl.com/wp-content/uploads/Plastics-and-Sustainability.pdf>.

² See Am. Plastic Makers, *What is Advanced Recycling*, available at <https://www.plasticmakers.org/advanced-recycling/> (noting that through advanced recycling, “[u]sed plastic products become new products again, keeping plastics out of our environment and reducing our need for virgin resources”).

3. PLASTICS encourages Rhode Island to recognize the benefits of advanced recycling.

LP 1660/SP 655 would regulate advanced recycling technologies as manufacturing facilities, which will enable residents of the state to recycle greater amounts and types of plastics packaging. Advanced recycling technologies play an important role in ensuring resources are kept at their highest and best use and remain complementary to mechanical and organic recycling. Collaboration across the supply chain is critical to support the development of new material-to-material pathways.

Advanced recycling technologies are necessary and essential complements to mechanical and organic recycling technologies to improve the recycling rate, reduce plastic waste, and increase the amount of recycled plastic in commerce. Advanced recycling converts post-use plastics into their original building blocks, specialty polymers, feedstocks for new plastics, waxes and other valuable products. This process takes place in the absence of an oxygen. Advanced recycling is not incineration, as it is often inaccurately labeled. These technologies would help more material to be recycled, which would increase the value of the entire recycling system.

Thank you again for the opportunity to comment on this very important proposal. PLASTICS advocates for the responsible recycling, reuse, and recovery of all plastics products, and while we respectfully oppose this measure as it is currently written, we welcome any opportunity to work with policymakers to successfully grow and improve Maine's recycling sector.

If I can provide any further information or answer any clarifying questions, please do not hesitate to reach out to me at dfortunato@plasticsindustry.org.

Sincerely,

Danielle Fortunato
Regional Director, State Government Affairs
Plastics Industry Association