



June 20<sup>th</sup> 2024,

**In re: Opposing MA S 2830 (renumbered from S 570) An Act To Reduce Plastics**

Dear Members of the Senate,

We the undersigned organizations representing industries and workers across Massachusetts respectfully request your opposition of S 2830 – An Act To Reduce Plastics. As currently written the bill includes several broad definitions that would imperil Massachusetts ability to employ new advanced recycling technologies that recycle more types of post-use plastics.

**ACC opposes this bill for two reasons: It bans advanced recycling, and it bans certain plastic items.**

Advanced recycling technologies enable plastics that currently do not have strong end markets (e.g. films, pouches and tubes) to be converted back to their basic chemical building blocks. These chemical building blocks can go back into new food grade plastics, useful chemicals, and other products like waxes, lubricants and ultra-low sulfur transportation fuels. Technologies such as pyrolysis and gasification heat plastics in an oxygen deprived environment and convert the plastics to liquid feedstocks that can be remanufactured into a versatile mix of new products for remanufacturing. Conversely, the purpose of solid waste incineration facilities is to destroy waste materials via combustion or burning.

Unfortunately, S 2830 seeks to define technologies that define pyrolysis and gasification and link these technologies to the destruction of waste materials. This contradicts legislation that has been adopted in 25 other states, most recently Michigan and Utah. **Advanced recycling is NOT combustion or burning.** Technologies such as pyrolysis and gasification heat plastics in an oxygen deprived environment and convert the plastics to liquid feedstocks that can be remanufactured into a versatile mix of new products.

**We respectfully request the bill is amended to remove Lines 39-42.** No other state has adopted a ban on advanced recycling. In fact, several bills that offered similar language were rejected by the legislatures in the Northeast region this session in New York, New Hampshire, Rhode Island, and Vermont.

On May 17, 2024, Colorado Governor Jared Polis vetoed legislation that would have limited the potential of advanced recycling technologies and would have defined pyrolysis and gasification as waste to energy incineration. Pyrolysis and gasification technologies are used in a number of applications. Governor Polis' veto message suggested it is inappropriate to ban a specific technology in statute and it discourages potential innovation.

From an environmental standpoint, the emissions for these facilities are low. A [recent report](#) found that advanced recycling facilities have emissions that are on par or lower than industrial facilities such as food manufacturing and community institutions such as hospitals and universities. These technologies do not produce pollutants like dioxins and are strictly regulated and monitored by federal, state, and local air emissions authorities.

Again, we urge the Senate to OPPOSE this bill to ensure Massachusetts ability to recycle and recover more types of plastics.

Thank you for your consideration.

Sincerely,

American Chemistry Council

American Fuels & Petrochemical Manufacturers

Association of Home Appliance Manufacturers

Berry Global

Braven Environmental

Brightmark

Consumer Brands Association

Flexible Packaging Association

Polymeric Exterior Products Association (PEPA)

Plastic Energy

Plastics Industry Association

Printing United Alliance

Sealed Air

U.S. Tire Manufacturers Association