



June 28th 2023,

Honorable Michael Barrett and Members of the Joint Committee on Telecommunications,
Utilities and Energy

In re: Opposing HB 3701 relating to An Act Relative To Chemical Recycling

We the undersigned organizations representing industries and workers across Massachusetts respectfully request your opposition of HB 3701– An Act Relative To Chemical Recycling. As currently written, the bill would prohibit the building, construction, or operation of advanced recycling facilities in Massachusetts.

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, H 3701 seeks to define regulated technologies as “including but not be limited to, gasification, pyrolysis, solvolysis, hydrolysis, methanolysis, enzymatic breakdown, combustion, or any other process used to transform plastic or plastic-derived materials into plastic monomers, chemicals, waxes, lubricants, chemical feedstocks, crude oil, diesel, gasoline, or home heating oil” and linking these technologies to the destruction of waste material.

This contradicts legislation that has been adopted in 24 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.

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.

In closing, we would like to reiterate the importance of distinguishing the conversion of everyday household plastic items and packaging via manufacturing processes such as pyrolysis and gasification from the destruction and disposal of hazardous, non-plastic waste. The processes

which remanufacture plastics back into useful products should remain distinct from other processes that dispose of waste. We urge the committee to oppose HB 3701 to ensure that Massachusetts ability to recycle and recover more types of plastics be protected, while simultaneously ensuring state leaders can protect their communities from unwanted development.

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

Household and Commercial Products Association

Plastic Energy

Plastics Industry Association

Printing United Alliance

Sealed Air

U.S. Tire Manufacturers Association

Vinyl Siding Institute