

February 4, 2026

*Electronic Delivery*

Honorable Delegate Marc A. Korman, Chair  
House Environment and Transportation Committee  
Maryland House of Delegates  
Annapolis, MD 21401

**Re: House Bill 92 – OPPOSE**

Dear Chair Korman and Members of the Committee:

The American Chemistry Council (ACC) appreciates the opportunity to submit comments in opposition to **House Bill 92**, which would prohibit the sale or distribution of plastic beverage container ring carriers in Maryland unless they are biodegradable.

ACC and its members share Maryland's commitment to reducing litter, protecting wildlife, and improving environmental outcomes. However, HB 92 is unnecessary and counterproductive given existing federal requirements, the nature of the material used in these products, and Maryland's recent enactment of a comprehensive packaging Extended Producer Responsibility (EPR) law.

**Plastic beverage ring carriers are already required to be degradable under federal law.** Plastic beverage ring carriers sold or distributed in the United States are already subject to long-standing federal requirements under U.S. Environmental Protection Agency regulations ([40 CFR Part 238](#)), which mandate that these products be made from degradable materials. This federal standard was specifically adopted decades ago to address concerns related to litter and wildlife interactions. As a result, an outright ban is not necessary to achieve the environmental objective HB 92 seeks to address.

**Bans on specific packaging formats risk unintended environmental consequences.**

Prohibiting a single packaging application such as beverage ring carriers does not eliminate the need for multi-container beverage packaging; it simply forces substitution to alternative materials and designs. Those alternatives, such as paperboard wraps, molded fiber, rigid plastic handles, or shrink wrap, often require more material by weight or volume, increase packaging complexity, and can result in higher transportation emissions due to added bulk and weight.

Packaging decisions involve tradeoffs across material use, performance, transportation efficiency, and overall environmental footprint. By targeting one specific format rather than evaluating packaging impacts holistically, HB 92 risks driving changes that increase overall material consumption without delivering meaningful environmental benefits.

Bans that focus on individual packaging formats do not advance circularity. Instead, they fragment packaging systems and distract from broader, system-wide efforts to reduce litter, improve collection, and strengthen material management outcomes across all packaging types.

**Maryland's packaging EPR law is the appropriate policy tool and should be allowed to work.** In 2025, Maryland enacted a comprehensive packaging EPR law designed to improve recycling access, invest in collection and processing infrastructure, and expand consumer education statewide. That framework addresses packaging impacts holistically and is intended to drive system-wide improvements rather than targeting individual products.

HB 92 moves in the opposite direction by singling out one packaging format, rather than allowing Maryland's EPR program to deliver durable, data-driven improvements in recycling performance and environmental outcomes. The state should allow its EPR law to be implemented and evaluated before pursuing additional product bans that preempt the goals of that program.

For these reasons, ACC respectfully urges the Committee to oppose House Bill 92. We look forward to continuing to work with Maryland policymakers on solutions that strengthen recycling infrastructure, support circularity, and deliver measurable environmental benefits.

Again, thank you for this opportunity to provide this information to the committee. If you have any questions or if I may be of further service, please feel free to contact Josh Young, ACC's Senior Director, Mid-Atlantic Region at 202-249-6223 or [Josh.Young@AmericanChemistry.com](mailto:Josh.Young@AmericanChemistry.com).

Sincerely,



Andrea Albersheim  
Director, Plastics Sustainability Policy  
American Chemistry Council