



February 4, 2025

RI Department of Health
Three Capitol Hill
Providence, RI 02908-5097

TTY: 771
www.health.ri.gov

The Honorable Joseph J. Solomon, Jr., Chair
House Committee on Corporations
State House
82 Smith St.
Providence, RI 02908

RE: H 5110 – An Act Relating to Businesses and Professions – Funeral Director/Embalmer and Funeral Home Establishments

Dear Chair Solomon:

Please accept this letter regarding H 5110, legislation that would provide for the operation and duties of natural organic reduction for the contained, accelerated conversion of human remains to soil as well as alkaline hydrolysis. Disposition facilities would be used for either cremation, alkaline hydrolysis, or natural organic reduction.

The Rhode Island Department of Health (RIDOH) is in strong conceptual support of natural organic reduction and alkaline hydrolysis, which aims to reduce the environmental impact of burial. Natural organic reduction reduces a body to organic material before, or instead of, burial by using non-toxic means to create soil rather than using toxic means to create ash.

To ensure an adequate regulatory structure for natural organic reduction, R.I.G.L. 23.3.18 would have to be amended to add language on the specific requirements for natural organic reduction and alkaline hydrolysis and must include RIDOH's Office of the State Medical Examiners (OSME) oversight. It is important to ensure that the Vital Records statute reflects that the OSME will have to authorize all "natural reductions" prior to the process just as the OSME authorize all cremations now.

RIDOH would require additional funding to license this new class of disposition facilities and provide staff support to the proposed new work, including at least one additional FTE, at a total annual estimated cost of \$111,707 (salary and benefits) and a subject matter expert to inspect the facilities. The current funeral home and crematory inspector is contracted at \$200 per inspection.

Before any systems changes can be made, it is critical to identify and secure the funding necessary to make and sustain the changes. In the absence of such funding, RIDOH is not able to support this bill. However, RIDOH is willing and interested in working with the sponsors to improve the current proposed legislation. Thank you for the opportunity to comment on this legislation.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Larkin for".

Jerome M. Larkin, MD
Director

CC: The Honorable Members of the House Committee on Corporations
The Honorable Michelle McGaw
Nicole McCarty, Esquire, Chief Legal Counsel
Lynne Urbani, Director of House Policy
