



Honorable David Bennett
Chair, House Environment and Natural Resources
Committee Rhode Island General Assembly
82 Smith Street
Providence, RI 02903

RE: Seeking Amendments- RI HB 7619- Toxic Packaging Reduction Act

March 21, 2024

Dear Chair Bennett and Members of the House Environment and Natural Resources Committee,

The American Chemistry Council (ACC) is a national trade association representing chemicals and plastics manufacturers in the United States, including member companies in Rhode Island. Our members are committed to the safety of their products and to the protection of public health.

Chemistry provides significant economic benefits in every state including Rhode Island. Thanks to chemistry, our lives are healthier, safer, and more productive than before.

ACC supports Rhode Island legislators' efforts to protect its communities, environment, and natural resources. We are however **seeking amendments to HB 7619** as follows:

ACC proposes the following language on page 2, lines 17-20 to provide for suppliers to make necessary adjustments while also allowing for reasonable and safe use:

(ii) Effective July 1, 2027, the use of a regulated chemical as a processing agent, mold release agent, or intermediate is considered intentional introduction for the purposes of this chapter where the regulated chemical is detected in the final package or packaging component above a level of 750 parts per million.

ACC proposes striking language related to banning packaging that contains polystyrene, expanded polystyrene, polyvinyl chloride (PVC), polyvinylidene chloride.

This overly broad prohibition disregards sound science and could potentially have major unintended socioeconomic, environmental, and public health consequences by arbitrarily eliminating packaging best suited for, among other uses, food preservation, medical supply and device protection, and hazardous materials containers.

Banning plastics including polystyrene and PVC could result in health and safety concerns, and simple substitution for packaging is not possible in many cases. This bill would ban outright any packaging made from PVC or polystyrene, which are not toxic substances, and have been studied by regulatory agencies around the world. These agencies have regulations for use of these materials that account for factors such as types of products with which they can come into contact, conditions of use, and migration limits for substances that could potentially transfer from packaging into a product.

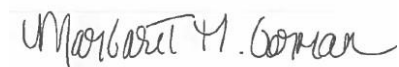
A ban would, again without scientific basis, deprive residents of Rhode Island of critical

products like meat wrap and produce packaging, glass jar & bottle lid liners, and metal can liners, all of which preserve food longer than alternatives; as well as packaging that is tamper-resistant to protect pharmaceuticals, and medical products which prolong the useful life of stored blood and other critical healthcare needs. This broad-blanket ban of such essential packaging is unprecedented and unwarranted.

Finally, use of plastic products can also help fight climate change and support achievement of sustainability goals. Outright bans on materials do not consider potential important tradeoffs including how certain packaging materials promote food safety or prevent food waste, a significant contributor to climate change as 25% to 30% of global emissions come from the food system.

Thank you for this opportunity to provide comments on HB 7619. If you have questions, please contact me at Margaret_Gorman@americanchemistry.com.

Sincerely,



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