



April 4th 2024,

RE: Oppose – RI H 7515 Microplastics Reduction Act

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

We are writing to respectfully **oppose** H 7515 related to the Microplastics Reduction Act which would ban the sale, offer or distribution into commerce any product containing synthetic polymer micro particles beginning January 1 2028.

We the undersigned support Rhode Island legislators' efforts to protect its communities, environment, and natural resources. However, **this bill puts into place a ban on polymer micro particles without completion of a science-and risk-based assessment.**

A science-and risk-based system is necessary to better understand the potential risks from microplastics. The bill bans micro particles before the evaluation of data from studies of soil, water and other media or development of a strategy to reduce microplastics.

As a general principle, we support funding research necessary to close information needs identified by the World Health Organization and to inform risk assessment. Several critical measures are needed to ensure regulators have access to high quality data and include:

- Adoption of a standardized definition for microplastic and supporting definitions to avoid uncertainties when enforcing the regulation.
- Development and adoption of standardized and validated analytical methods to accurately measure microplastics in various environmental media.
- Development and use of scientifically robust hazard screening and testing methods, including quality assurance and quality control criteria for hazard testing, and reference materials.
- Adoption of a risk assessment framework that addresses the complexities of microplastics, hazards and exposures.

The bill is based on the premise of a widely agreed upon science-based definition of "microplastics". However, there is currently no recognized definition of microplastics.

A single definition of microplastics should be adopted based on those developed by consensus

driven processes such as the ASTM and ISO organizations which would prevent ambiguity between scientists and regulators. It should also be noted that the current definition used in the bill would classify dyed wool as a “synthetic polymer microparticles.” It is likely that many other polymer types would be unintentionally classified under such a non-specific definition. .

We recommend only the use of proper QA/QC testing protocols for microplastics.

The development and adoption of standardized analytical methods, test methods, quality assurance and quality control criteria, and reference and test materials would ensure measurements of microplastics in the environment are comparable and able to be replicated across laboratories.

We strongly recommend the Committee considers the concerns and recommendations laid out in this letter to provide for reasonable, achievable, and consistent timelines, scopes and other key elements. We encourage the Legislature to take this approach not only with this bill but any future legislation impacting other industries and products.

Sincerely,

American Chemistry Council

American Fuel and Petrochemical Manufacturers

Association of Home Appliance Manufacturers

Berry Global

Consumer Brands Association

Consumer Healthcare Products Association (CHPA)

Household Commercial Products Association

Flexible Packaging Association

Fragrance Creators Association

Personal Care Products Council

Plastics Industry Association

Printing United Alliance

Sealed Air

Vinyl Siding Institute

US Tire Manufacturers Association