



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF THE DIRECTOR
235 Promenade Street, Room 425
Providence, Rhode Island 02908

May 13, 2025

The Honorable David Bennett
Chairman
House Committee on Environment and Natural Resources
82 Smith Street
Providence, Rhode Island 02903

RE: H 6205 An Act Relating to Health and Safety – Extended Producer Responsibility for Packaging and Paper Act

Dear Chairman Bennett,

Thank you for providing the Department of Environmental Management (DEM) the opportunity to comment on H 6205, which would institute extended producer responsibility (EPR) requirements for producers of paper and packaging.

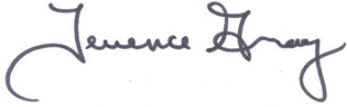
H 6205 would require that DEM perform a substantial oversight role in the selection of a producer responsibility organization (PRO) and review and approval of regular program plans. We do not believe our existing staff resources are sufficient to implement the requirements placed upon DEM by this legislation. Although H 6205 includes provisions making funding available to DEM to cover reasonable costs associated with the administration and enforcement of the program, it does not explicitly make staff available to DEM for this purpose. This is an important distinction because DEM's ability to hire new staff is constrained by the FTE authorization included in each year's state budget and, absent an increase in the authorization, may be unable to hire staff even if funding is available.

It should also be noted that although five states have enacted laws comparable to H 6205, none have fully implemented and operationalized these programs. As a result, there will be limited opportunities for DEM to learn from the experiences and best practices of other states in implementing the program envisioned by this legislation. This only heightens the need to ensure that DEM is well-resourced to implement the legislation.

We appreciate the opportunity to offer comments on this legislation and would be pleased to make ourselves available as needed. Please feel free to contact Ryan Mulcahey, DEM Director of

Legislative Affairs, at ryan.mulcahey@dem.ri.gov should you have any additional questions or wish to discuss this matter further.

Sincerely,

A handwritten signature in dark ink, appearing to read "Terrence Gray". The signature is fluid and cursive, with the first name "Terrence" being more prominent than the last name "Gray".

Terrence Gray, P.E.
Director

cc: Members of the House Committee on Environment and Natural Resources
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House
Lynne Urbani, House Policy Director