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May 13, 2025

Representative David A. Bennett, Chair  
House Committee on Environment and Natural Resources  
Providence, Rhode Island 02903

**Re: H 6207 (McEntee) "Relating to Health and Safety"**

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

The Consumer Technology Association™ (CTA) respectfully submits this letter to voice our opposition to House Bill 620 (H 6207), an act relating to health and safety. CTA is North America's largest technology trade association. Our members are the world's leading innovators – from startups to global brands – helping support more than 18 million American jobs. Our member companies have long been recognized for their commitment and leadership in innovation and sustainability, often taking measures to exceed regulatory requirements on environmental design and product stewardship. We respect the overall intent of this bill to reduce the amount of packaging in the waste stream but cannot support this bill as written and offer the following comments that support our opposition and potential amendments.

**EPR for Packaging and Paper vs Beverage Containers Recycling Act**

As a durable goods industry, CTA believes that this bill should be split into two separate bills: one for packaging EPR and one for the Beverage Containers Recycling Act. The bill as written is currently split into two separate chapters which leads to an easy split.

**Industry Experience with Extended Producer Responsibility**

We recognize the importance of recycling. Our members have financially supported and facilitated the collection and recycling of consumer electronics in Rhode Island for a decade, under the Rhode Island Electronic Waste Recycling Program<sup>1</sup>. Rhode Island isn't alone – our members have implemented and complied with state-level producer responsibility laws for electronics in 24 other jurisdictions. Our industry has almost two decades of experience in state level producer responsibility programs. The patchwork of state level electronics producer responsibility laws, each one varying in scope, has proven costly and inefficient across jurisdictions as the electronics industry has spent well over \$1 billion

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<sup>1</sup> Rhode Island Electronic Waste Recycling Program website at <https://dem.ri.gov/environmental-protection-bureau/land-revitalization-and-sustainable-materials-management/ewaste> .

complying with these various state laws. Packaging EPR is expected to be a much larger program with a greater diversity of stakeholders.

**CTA believes that representation from the durable goods sector is necessary in order to best represent the different packaging factions and gather the best information for a more successful program.** CTA requests that the language of the bill be updated to include representation from the durable goods industry in the Advisory Board. Additionally, we request that PRO Board be required to include a manufacturer of a durable goods product that is not a retailer. See redlines below:

Section 19-19.19-2(c)(3) “Has a governing board consisting of packaging and paper product producers that represent the diversity of packaging in the market **including representation from a durable goods manufacturer that is not a retailer**; and”

#### **Producer Responsibility Organization**

CTA requests that Section 23-19.19-2(c) be updated to reflect 5 years, not 10 years. CTA believes that the

#### **Shared Responsibility Structure**

CTA is supportive of the inclusion of cost sharing currently included in the bill text that equates to shared responsibility of the program. However, we believe that there is room for a greater portion of the program cost be supported by the State.

#### **Weight-Based Reporting**

CTA does not support the reporting scheme outlined at Section 23-19.19-5(b)(4)(i) that requires that reporting be based on “unit and weight”. CTA requests that all reporting be based on weight only. CTA believes that measuring each material by their weight gives the best overall representation of material usage overtime. Additionally, other jurisdictions in Canada and the EU use weight-based reporting. Harmonizing reporting procedures ultimately leads to increased cost efficiencies for producers to implement these programs. Many electronics companies are reducing the total amount of their packaging by replacing a large piece of protective material with smaller end or corner pieces. CTA is happy to provide additional information on this topic if needed.

CTA requests that Section 23-19.19-13(a)(1)(i) be updated to reflect weight only and not number of units for the reasons expressed above.

#### **Packaging Sales Restrictions Section 23-19.19-6**

CTA requests that part (c) be updated to reflect a 5 year time period. Packaging for consumer electronics is designed and manufactured during a period greater than 2 years. Any extension period less than the total design and manufacturing period does not make logistical sense and could lead to confusion, supply chain disruptions, and an increase in costs.

#### **Conclusion**

CTA appreciates the opportunity to address concerns around H 6207 and we respectfully request amendments to the bill as written. We welcome further dialogue with the Legislature and other stakeholders and to be a part of the process for defining the role of producers in a shared responsibility system for packaging in Rhode Island.

Sincerely,

Rhode Island House Bill 6207

May 13, 2025

A handwritten signature in black ink, appearing to read "Ally Peck". The signature is fluid and cursive, with the first name "Ally" and the last name "Peck" clearly distinguishable.

Ally Peck

Director, Environmental and Sustainability Policy

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