



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF THE DIRECTOR
235 Promenade Street,
Providence, RI 02908

Office: 401.222.2771
Fax: 401.222.6802

March 12, 2024

The Honorable Susan R. Donovan
Chairwoman
House Committee on Health and Human Services
82 Smith Street
Providence, Rhode Island 02903

RE: H 7886 An Act Relating to Animals and Animal Husbandry – Cruelty to Animals

Dear Chairwoman Donovan,

Thank you for providing the Department of Environmental Management (DEM) the opportunity to comment on H 7886, which would prohibit any manufacturer from selling any cosmetic product that was developed or manufactured using an animal test. DEM has concerns with this legislation.

DEM appreciates that the intent of this legislation is to improve animal welfare, but we are concerned that it does not detail how it would be implemented by state government. Because the legislation seeks to amend Title 4, which generally includes statutes which are implemented by DEM, we are concerned that DEM would be responsible for enforcing the prohibition on the sale of cosmetic products tested on animals. Enforcement of a prohibition of this nature would require us to investigate the compliance status of the many different cosmetic products currently available for sale in Rhode Island. Such an investigation is outside DEM's current scope of duties and would significantly diminish our capacity to respond to other animal cruelty investigations. Therefore, we recommend that any legislation on this topic consider an enforcement mechanism that is complaint-driven rather than requiring DEM staff to conduct proactive inspections of retailers selling cosmetic products.

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 Scott Marshall, DVM, Rhode Island State Veterinarian, at scott.marshall@dem.ri.gov should you have any additional questions or wish to discuss this matter further.

Sincerely,

Terrence Gray, P.E.
Director

cc: Members of the House Committee on Health and Human Services
The Honorable Charlene Lima
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House
Lynne Urbani, House Policy Director