



Inspiring Generations of Play

1375 Broadway • Suite 1001 • New York, NY 10018
t. 212.675.1141 • e. info@toyassociation.org

March 20, 2024

Senate Environment and Agriculture Committee
State of Rhode Island General Assembly
82 Smith Street
Providence, RI 02903

RE: Oppose – RI S 2300 Microplastics Reduction Act

Dear Chair Dimario and Members of the Senate Environment and Agriculture Committee,

On behalf of the toy industry, I write to you today to respectfully oppose Senate Bill 2300 which would ban all microplastics in most cases. These comments are provided on behalf of The Toy Association and its 900+ members, representing manufacturers, importers, designers, retailers, inventors, and toy safety testing labs, all working to ensure safe and fun play for families. Toy safety is the number one priority for the industry, as evidenced by the fact that the industry and The Toy Association have been global leaders in advancing toy safety for decades. While we certainly understand and applaud the intent of SB 2300, as currently written it is entirely unworkable and would leave children across the country without many of their favorite toys and games.

Banning or restricting microplastics is not an entirely new concept. We've recently seen activity in the European Union on this very topic. However, where the EU has succeeded in enacting new restrictions (which are still not perfect) and where this legislation falls short is in the broad banning of the final product as a whole, as opposed to the singular microplastic itself. The European regulation (EU) 2023/2055 applies only to substances and mixtures but not to articles, while RI S2300 would ban all articles, including substances and mixtures.

If enacted, this legislation will outlaw a huge range of product and components, and for toys this would include small gaming dice and other pieces of board and card games; beads in jewelry making kits; glitter; sequins; certain fillings in stuffed toys as well as some eyes and noses on stuffed toys; small components and accessories on dolls; and many other parts and pieces of your kid's, or even your favorite, toys just to name a few.

Further, we have grave concerns on the potential impact on any manufacturing by way of injection molding, which would be outlawed in Rhode Island if this bill were to become law since the plastic resin feedstock for injection molding itself would fall under the scope. Therefore, this bill has major economic implications to the state of Rhode Island as currently written, not only from a retail and commercial standpoint, but also from a manufacturing standpoint.

Thank you for the opportunity to submit comments on SB 2300.

Charlotte B. Hickcox
Director, State Government Affairs

About The Toy Association and the toy industry:

The Toy Association is the North American based trade association; our membership includes more than 900 businesses, from inventors and designers of toys to toy manufacturers and importers, retailers and safety testing labs, and all members are involved in bringing safe & fun toys and games to children. The toy sector is a global industry of more than US \$90 billion worldwide annually, and our members account for more than half of this amount.

Toy safety is the top priority for The Toy Association and its members. Since the 1930s, we have served as leaders in global toy safety efforts; in the 1970s we helped to create the first comprehensive toy safety standard, which was later adopted under the auspices of ASTM International as ASTM F963. The ASTM F963 Toy Safety Standard has been recognized in the United States and internationally as an effective safety standard that has been adopted as a mandatory toy safety standard for all toys sold in the U.S. under CPSIA in 2008. It also serves as a model for other countries looking to protect the health and safety of their citizens with protective standards for children. The Toy Association continues to work with medical experts, government, consumers and industry to provide technical input to ensure that toy safety standards keep pace with innovation and potential emerging issues.

The Toy Association is committed to working with legislators and regulators around the world to reduce barriers to trade and to achieve the international alignment and harmonization of risk-based standards that will provide a high level of confidence that toys from any source can be trusted as safe for use by children. Standards alignment assures open markets between nations to maximize product availability and choice.
