



Toray Plastics (America), Inc.

50 Belver Avenue

North Kingstown, R.I. 02852-7500 USA

Tel: (401) 294-4511

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Honorable David A. Bennett
Chairman, House Environment and Natural Resources Committee
Rhode Island State House
82 Smith Street
Providence, RI 02903

RE: H6205

In its current form, this bill would cost Toray millions of dollars in lost sales.

Point 1: How we interpret the definition of post-consumer recycling classification. 23-19.19-2(8),(9) & (22) designate the consumer as only household units, so when analyzing the definition (22) of PCR, it limits classification to materials coming solely from households. Business recycled material, such as paper waste from businesses, is not included. This impacts Toray, as we sell film to a battery manufacturer (for electric cars) in the Midwest. Toray is returning the used film to be mechanically recycled and used in this and other products. Today, under our ISCC+ registration, this film can be designated as post-consumer since it has fulfilled its intended purpose in the battery manufacturing process. We prefer the definition of Post Consumer Recycle to align with the ISO definition under 15270:2008.

Point 2: Advanced recycling fuel exemption. Currently, Toray uses advanced recycling resin from our major manufacturers (i.e., ExxonMobil, Shell, Total Energies), where post-consumer plastics are chemically recycled into pyrolysis oil, offsetting crude inputs that are turned into virgin resin for our use. In this process, a proportion of the input material naturally contributes to fuel production (lighter hydrocarbons), with much going into the new plastics we purchase. The language of PCR 23-19.19-2 (29)(ii) excludes the fuel from being considered in the process, artificially increasing costs for TPA and the eventual brands that use it.

This impacts Toray as today we purchase several million pounds of this material to produce products for Fortune 500 companies. Europe has been pioneering advanced recycling within its system, and it currently does not have the same exemption being considered.