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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: H6207

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

Toray has the same concern as the language in 6205 for domestically sourced PCR materials 23-19.20-09 (a)(1)(ii)(A) Point 1: Recycling does not include pyrolysis or solvolysis, 23-19-19-1(55)(iii). This will drastically reduce Toray ability to utilize chemically recycled content, as this would not be considered PCR material. Chemical recycling is not like incineration, where all materials are burned. Instead, it involves plastics that cannot be utilized in mechanical recycling. Since these materials are already roughly sorted, the emissions and concerns differ from those associated with general incineration. Additionally, chemical recycling has demonstrated lower CO2 generation compared to virgin production.

Point 2: Additive of high concern. The concern is that the additive of high concern provision within the legislation does not have a clearly defined mechanism for how the additives will be highlighted, commented on, or implemented. Without a defined mechanism, this provision could potentially be catastrophic when new items are found and challenged.

Point 3: 23-19.19-1(a)(33) defines incidental presence as <100ppm, while 23-19.19-1(a)(36) defines restrictions on intentionally added where the additive is detected in the finished article. Does this mean only when over 100ppm? The language is very vague and does not address mission creep.

Point 4: Post-consumer recycled content 23-19-19-1(52) is calculated by dividing the total amount of post-consumer recycled content of a particular material for that brand by the total material of that brand. It would be beneficial to define the scope for global brands (the total of that type sold globally, in North America, USA).

This impacts Toray as today we purchase several million pounds of this material to produce products for Fortune 500 companies.