



**American
Forest & Paper
Association**

August 26, 2020

Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Position: Concerns

Re: Comments on “Recommendations for Managing Plastic Packaging Waste in Washington”

Dear Washington State Department of Ecology:

The American Forest & Paper Association (AF&PA) appreciates the opportunity to share our perspective on the Cascadia study, “Recommendations for Managing Plastic Packaging Waste in Washington.” AF&PA serves to advance a sustainable U.S. pulp, paper, packaging, tissue and wood products manufacturing industry through fact-based public policy and marketplace advocacy. AF&PA member companies make products essential for everyday life from renewable and recyclable resources and are committed to continuous improvement through the industry’s sustainability initiative — Better Practices, Better Planet 2020. In Washington, the industry employs over 29,000 individuals at over 80 paper manufacturing facilities including 12 pulp and paper mills.

Specifically, we are concerned that although the purpose of the study was to recommend a policy solution for plastic recycling, the study overreaches the scope of Senate Bill 5397 by recommending extended producer responsibility (EPR) for all types of packaging, even for paper, where substantial private sector investment has resulted in very high recovery rates relative to plastic.

This recommendation for a program modeled on British Columbia is delivered in spite of recent research on the B.C. program from York University in Toronto, Canada stating that “program costs have increased by approximately 26 percent, while program performance (measured as percent of tonnes diverted) has increased by 1 percent.” The same report concludes that “increases in the cost of recycling of end of life printed paper and packaging is ultimately born by the consumer.”¹

¹ “Review of Recycle BC Program Performance,” Dr. Calvin Lakhan & Elizabeth Cho McMillan, Faculty of Environmental Studies, York University.

Plastic Recycling Should not be Subsidized by Other Highly Recovered Materials

AF&PA agrees that industry shares a role in responsibility for recycling material, and we are doing our part.

- Every year since 2009, the U.S. paper recovery for recycling rate has met or exceeded 63 percent. And in 2019, 66.2 percent of all paper consumed in the U.S. was recovered for recycling.
- According to the U.S. EPA, more paper (by weight) is recovered for recycling from municipal solid waste streams than glass, plastic, steel and aluminum combined.
- From 2018 to 2022, our industry is investing \$4.1 billion in our own manufacturing infrastructure that will allow us to recycle more paper. Companies are using new technology to reduce the amount of material in packaging and right size capital expenditures. Those are great ways for companies to compete in the market place to ensure consumers are getting what they want.
- Ninety-six percent of the U.S. population had access to community curbside and/or drop-off paper recycling services, according to the most recent (2014) survey of communities.

The paper industry's consistently high recovery rates, and ongoing efforts to increase recovery, demonstrate that EPR is unnecessary for paper.

- In 2019, the Washington Legislature passed the Plastic Packaging Evaluation and Assessment law, which directed the Washington State Department of Ecology (Ecology) to hire an independent third-party consultant team to study how plastic packaging is managed in Washington and assess various policy options to meet the goals of reducing plastic packaging waste. The direction of the legislation is clear, the study and policy recommendations should be on plastic packaging and not on other materials like paper.
- Imposing regulatory costs on our industry through EPR will reduce resources available for further investment.

The responsibility for materials recovery must be distributed equitably.

- The paper industry is doing its part by meeting or exceeding ambitious voluntary recovery goals for our products. An EPR program that includes paper will increase cost for no return or benefit to the recycling system.
- As directed, the study and its policy recommendations should focus on improvements to plastic packaging and its recovery.

Conclusion

We believe that the draft Ecology study ignores key facts and fails to follow obvious legislative intent and direction to formulate a policy recommendation narrowly tailored to address the pressing problem of plastic waste.

Thank you for the opportunity to comment on the "Recommendations for Plastic Packaging Waste in Washington" and we hope to see some of our comments included in the final draft of

the study. Please feel free to contact Terry Webber, Executive Director, Packaging, AF&PA at 202) 463-2732 or terry_webber@afandpa.org for further information.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Elizabeth Bartheld', with a stylized flourish extending to the right.

Elizabeth Bartheld
Vice President, Government & Industry Affairs