1000 Abernathy Road, NE
Atlanta, Georgia 30328

Smurfit Westrock

July 22, 2026

SUBMITTED VIA E-MAIL @ ecology.wa.gov

Surabhi Subedi
Environmental Planner
Climate Pollution Reduction Program
Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Dear Mr. Subedi:

WestRock Company ("WestRock") appreciates the opportunity to comment on the Department of Ecology's ("Ecology") proposed amendments to Chapters 173-441 and 173-446 WAC, including provisions intended to facilitate linkage of Washington's Cap-and-Invest Program with the California-Quebec carbon market. WestRock has a direct and substantial interest in this rulemaking because it owns regulated pulp and paper sites in Washington and operates a paper manufacturing facility in Quebec that participates in the Cap-and-Trade System for Greenhouse Gas Emission Allowances. This experience gives WestRock practical insight into both Washington's current program and the operational realities of participating in a linked carbon market.

WestRock supports Ecology's efforts to link Washington's market with the established California-Quebec market because a larger, more liquid market should improve allowance availability, reduce price volatility, and provide covered entities with greater certainty for long-term planning, capital allocation, and emissions-reduction investments. Since the Cap-and-Invest Program ("Program") began in 2023, Washington's standalone market has experienced an increase in allowance prices. Without the proposed linkage, Washington facilities may continue to face compliance costs that are materially higher than comparable mills in other U.S. jurisdictions and potentially higher than international competitors. Those cost disparities can increase delivered product costs, influence customer sourcing decisions, and affect where future investments are made. Linkage can help address these risks while preserving the Program's greenhouse gas reduction goals, provided Ecology implements the final rule in a manner that is transparent, administratively workable, and sensitive to the operational realities of emissions-intensive, trade-exposed facilities.

Accordingly, WestRock encourages Ecology to ensure the final linkage rulemaking:

- Provide facilities with pending allocation baseline adjustment requests sufficient time before compliance deadlines for Ecology to issue determinations and for affected facilities to incorporate any resulting allowance adjustments into their compliance planning efforts;

- Confirm that allocation baseline adjustments may be applied retroactively to any year within a compliance period, including the first compliance period (2023 through 2026), so that allocations can reflect facility operations as accurately as possible;

- Resolve inconsistencies in the proposed rule and expressly confirm that significant ownership and operational changes occurring before January 1, 2023, may be considered when evaluating baseline adjustment requests; and

- Remove or substantially revise the proposed benchmarking provisions that compare EITE facilities to other Washington EITE facilities. Such comparisons depend on information that is not available to regulated entities, may not be transparent or reproducible, and may fail to account for facility-specific differences in equipment, product mix, process configuration, energy sources, customer requirements, and market conditions.

WestRock also supports and incorporates by reference the comments submitted by the Northwest Pulp & Paper Association on this rulemaking.

We appreciate Ecology's consideration of these comments and the opportunity to participate in this important rulemaking process.

Sincerely,

Nina E. Butler
VP and Senior EHS Counsel