



November 4, 2013

Wayne Gjerde
Recycling Market Development Coordinator
Minnesota Pollution Control Agency
520 Lafayette Road N
St. Paul, MN 55155

Dear Mr. Gjerde,

On behalf of the American Forest & Paper Association (AF&PA)ⁱ and the Minnesota Forest Industries (MFI)ⁱⁱ, we are writing to express concerns about the recycling refund program for beverage containers proposed by the Minnesota Pollution Control Agency (MCPA).

We believe that the environmental performance of paper-based beverage containers and our industry's voluntary efforts to increase access and recovery are impressive. Paper-based packaging, including shelf-stable and refrigerated cartons, should not be included as part of the proposed recycling refund program. Thanks to the work of the Carton Council, access to recycle cartons in Minnesota has grown from 3 percent of the state's residents in early 2010 to nearly 60 percent today. The Carton Council continues to work to add carton recycling access to more Minnesota communities this year.

All paper-based liquid packaging should be collected through the community residential recycling program (versus a deposit program) because it helps avoid consumer confusion. Multi-material curbside programs have also proven to achieve high recycling rates at a much lower cost while a recycling refund program as proposed would introduce unnecessary extra costs for consumers, business and local authorities. Additionally, including these containers in curbside helps minimize the carbon footprint, so all the material is collected weekly by trucks rather than consumers making individual trips in cars to redeem containers.

Paper-based packaging is a commodity that is highly recycled, recyclable, compostable and renewable. More than 60 percent of paper consumed in the U.S. has been recovered for recycling each year since 2009 – and exceeded 65 percent in 2012. Given this environmental record, we believe that including paper-based beverage containers as part of the bottle bill is unnecessary and could interfere with the tremendous progress that our voluntary efforts have yielded by disrupting markets for

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recycling paper-based containers and would damage the viability of existing proven and optimized collection and recycling systems.

For the reasons stated above, AF&PA and MFI respectfully oppose the recycling refund program for beverage containers proposed by the MPCA in its current form. We encourage you to avoid measures that penalize commodities that are recovered at a high percentage and, as always, we stand ready to assist you and offer our expertise as a resource as you continue the dialogue on this important issue. If you have questions, please contact AF&PA's legislative advocate, Lloyd Grooms, at (612) 386-6327 or lgrooms@winthropandweinstine.com.

Sincerely,

Cathy Foley
Group Vice President
American Forest & Paper Association

Wayne Brandt
Executive Vice President
Minnesota Forest Industries

ⁱAF&PA serves to advance a sustainable U.S. pulp, paper, packaging, 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*. The forest products industry accounts for approximately 4.5 percent of the total U.S. manufacturing GDP, manufactures approximately \$200 billion in products annually, and employs nearly 900,000 men and women. The industry meets a payroll of approximately \$50 billion annually and is among the top 10 manufacturing sector employers in 47 states. In Minnesota, the industry employs more than 25,000 individuals and has over 115 paper manufacturing facilities. Visit AF&PA online at www.afandpa.org or follow us on Twitter [@ForestandPaper](https://twitter.com/ForestandPaper).

ⁱⁱMFI is an association representing the state's forest products companies. MFI members encourage conservation, proper forest management and industry development that foster sound environmental stewardship, multiple use of timber lands and sustainable, long-term timber supply.