



January 23, 2014

Wayne Gjerde
Minnesota Pollution Control Agency
520 Lafayette Road N
St. Paul, MN 55155-4194

RE: Comments on Draft Report to Minnesota Pollution Control Agency (MPCA) Recycling Refund System Cost Benefit Analysis

Dear Wayne:

Novelis is the world's largest recycler of aluminum. We recycle more than 40,000,000 cans annually around the world.

With our aggressive goal to increase the recycled content of our products to 80 percent by 2020, there is strong demand for UBCs to feed our highly-efficient recycling plants in New York, Kentucky and Georgia. As you know, the life cycle of an aluminum beverage can is just 60 days from "can to can." In this short time, a beverage can goes from the grocery store shelf to the consumer, and then on to a recycling facility where it can be remelted into can sheet and reformed into another aluminum beverage can with exactly the same physical characteristics as the original can. Because aluminum can be recycled with no degradation in quality, aluminum cans are the ideal product for a closed-loop approach to recycling.

The industry is committed to recycling aluminum without compromising on energy conservation or natural resource protection; Novelis is focused on increasing the end-of-life recycling of our products in partnership with other stakeholders in the aluminum production and recycling chain globally.

Alternative forms of recycling such as "waste-to-energy" conversion that's detailed in the report, "Comments on Draft Report to Minnesota Pollution Control Agency (MPCA) Recycling Refund System Cost Benefit Analysis," are potential sources of aluminum for recyclers, like Novelis. However, the by-product of these waste-to-energy plants are generally low-quality and have much lower recovery levels as compared to UBCs. There will typically be an outlet for this type of material, but the value will depend heavily on aluminum content and freight cost to consumption points. Traditionally this material has been "down-cycled" into lesser-quality products, losing its value in the recycling supply chain permanently.

We applaud Minnesota's commitment to recycling and support its efforts to increase collection rates in the state. As you know, aluminum cans in particular deliver high value as part of a closed loop recycling system. We are committed to collaborating with a range of stakeholders to support expanded post-consumer collection and recycling infrastructure and to develop partnerships that facilitate efficient recycling.

We are happy to provide any additional information as you consider your path forward.

Regards,

A handwritten signature in blue ink that reads "John Gardner".

John Gardner
VP and Chief Sustainability Officer
Novelis Inc.