



**American
Forest & Paper
Association**

TO:
Joint Committee on Environment
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**AF&PA Statement on
Connecticut Governor's Bill No. 27—
An Act Concerning Connecticut's Recycling and Materials Management Strategy
March 7, 2014**

The American Forest & Paper Association (AF&PA) appreciates the opportunity to share our perspective on legislation under consideration by the Connecticut Joint Committee on Environment, S.B. 27.

AF&PA shares the goals of S.B. 27 to increase recovery rates and reduce the amount of recyclable products going to landfills. We support voluntary paper and paper-based packaging recovery efforts that seek to improve upon the existing recovery and recycling programs in Connecticut and the United States.

We **respectfully oppose** certain parts of the bill on the basis that all parties impacted by this legislation should be included in discussion and determination of best solid waste management practices for the State of Connecticut.

AF&PA strongly believes that the voluntary recovery of paper and paper-based packaging is a recycling success story and any mandates or non-market incentives that distort the voluntary collection and free flow of recyclable materials could hurt, rather than help, increase recovery. For this reason, we urge the Environment Committee to require that input be sought from industry stakeholders *in addition* to municipalities and solid waste and recycling services when evaluating and selecting the final proposal to be implemented by the Materials Innovation and Recycling Authority, as in Section 3 of the bill.

Furthermore, we submit to the Committee that legislation of this scale should be considered during a longer session of the legislature, in order to provide sufficient attention and focus to the important, independent elements under consideration.

Background on AF&PA

AF&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 Connecticut, the industry employs more than 4,000 individuals, with an annual payroll of over \$250 million. The industry pays an estimated \$1.7 million in state and local taxes that support vital public services.

Promotion of Connecticut's Existing Paper Recycling Infrastructure and National Paper Industry Recycling Efforts

A majority of Connecticut's residents enjoy access to curbside and/or drop-off recycling programs within the existing paper and paper-based packaging collection infrastructure. According to the 2010 AF&PA Community Survey conducted by SAIC, 66 percent of Connecticut residents have access to curbside recycling and 71 percent of the state's residents have access to drop-off recycling.

Thanks to industry leadership and the efforts of millions of Americans who recycle at home, work, and school every day, national paper recovery has reached record levels and far less paper is going into landfills.

More than 60 percent of paper consumed in the U.S. has been recovered for recycling in each of the last three years. In 2012, 65.1 percent of the paper and paper-based packaging used in the U.S. was recovered for recycling – more than 51 million tons. In fact, the amount of paper recovered for recycling has increased by more than 75 percent since 1990, the year the industry established its first recovery goal. Recovering paper for recycling helps extend the life of paper and paper-based packaging products and is an integral part of the industry's sustainable practices.

Despite the tremendous progress that has already been made, the paper industry has no intention of resting on its laurels. In 2011 we announced a new, voluntary industry fiber recovery goal to exceed 70 percent by 2020.

According to the most recent data available from the U.S. Environmental Protection Agency (EPA) report, *Municipal Solid Waste in the United States: 2012 Facts and Figures*, the paper and paper-based packaging industry sets the standard for recovering our products from the solid waste management stream.

The tables below reflect data drawn from that EPA report and compare recovery rates for several key industries. The data show that paper and paper-based packaging has the highest recovery rate among major commodities, and that the growth in the recovery rate for paper and paper-based packaging is considerably higher than the growth in the recovery rates for other major commodities:

Recovery of Products from the Municipal Solid Waste Stream

Product	Recovery Rate
Paper and paperboard	64.6%
Steel	33.0%
Glass	27.7%
Aluminum	19.8%
Plastics	8.8%

Source: U.S. EPA (2013)

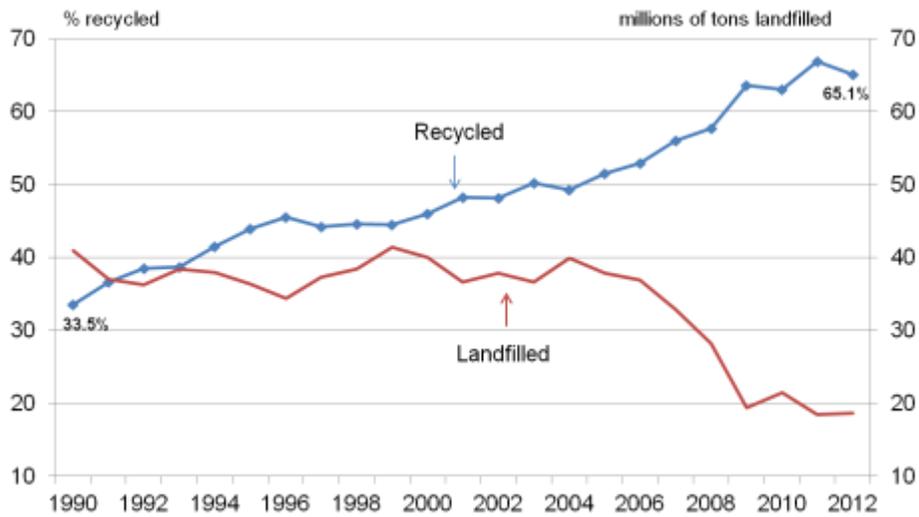
Growth in Recovery of Products from the Municipal Solid Waste Stream

Product	2007 Recovery Rate	2012 Recovery Rate	Change
Paper and paperboard	53.9%	64.6%	+ 10.7%
Steel	33.8%	33.0%	- 0.8%
Glass	23.0%	27.7%	+ 4.7%
Aluminum	21.7%	19.8%	- 1.9%
Plastics	6.8%	8.8%	+ 2.0%

Source: U.S. EPA (2013)

As a result of these large strides in recycling, paper going to landfills is estimated to have declined by approximately 50 percent since 1990, the year relative to which the paper industry first began benchmarking its recovery goals.

Paper Recovered for Recycling vs. Disposed of in Landfills (1990-2012)



Source: American Forest & Paper Association

Paper Industry Recycling Outreach Efforts

In the area of youth education, AF&PA partners with Kaleidoscope Youth and Family Marketing to develop standards-based curriculum materials that promote the benefits of paper use and recycling. The materials reach 375,000 second through fourth graders with an emphasis on creative thinking and paper recovery lessons.

Additionally, AF&PA is a sponsor of the collegiate RecycleMania competition. The annual competition promotes increased recovery of paper, paper packaging and other recyclable materials on college campuses across the country and in Connecticut. The Connecticut schools participating in the 2014 competition include Coast Guard Academy, Southern Connecticut State University, Trinity College, and Wesleyan University.

AF&PA also sponsors an annual recycling contest for schools, communities and businesses. The program, in its seventh year, highlights outstanding paper recovery programs across the United States.

Additionally, on AF&PA's paperrecycles.org website, we offer information on paper recycling statistics, free classroom materials, and resources to help start or improve paper recycling efforts at home, in the community, and at work.

Opposition to Consideration of Extended Producer Responsibility (EPR) Schemes

Certain groups in Connecticut have previously stated their support for consideration of EPR schemes in order to offset solid waste management costs and it is possible that such a program will be recommended when considering the redevelopment of the Mid-Connecticut Project. We have serious apprehensions regarding the implementation of product stewardship programs or an EPR scheme. In particular, we are very concerned that this approach will dismantle the existing effective infrastructure that currently exists to collect and recycle paper and paper-based packaging materials.

Government imposed fees unnecessarily increase costs for consumers and can create distortions in the free flow of recoverable commodities. Obligating the brand owner or manufacturer to assume all costs associated with managing waste from its products or requiring the brand owner/manufacturer to take back all of its products and packaging introduced into the commerce stream is detrimental because it will increase costs and create market distortions.

From a printed paper and paper-based packaging perspective, the practicality of a statewide EPR program is questionable. With the paper recovery rate being where it is today, the marginal costs of additional recovery through an EPR system would be cost prohibitive. There are many well established best practices, other than EPR schemes, that have proven to be successful in increasing the amount of recyclables for recovery, including but not limited to providing convenient recycling opportunities (i.e. single stream recycling or roll carts; volume-based solid waste services; and investment in education). Successful recycling programs result from careful planning, well-executed

and enforced policies, and a long-term commitment to changing individual behavior patterns.

Conclusion

AF&PA is willing to offer background and technical information on the paper and paper recycling industries to Connecticut. The paper industry continues to meet and exceed voluntary recycling goals for our products. We look forward to working with the state of Connecticut. Please feel free to contact Abigail Turner, Manager for State Government Affairs, AF&PA at (202) 463-2596 or abigail_turner@afandpa.org for further information.