

Members of the Senate Finance and Assembly Ways and Means Committees,

I am writing on behalf of WestRock to express our concerns with TED Part RR, which creates a wide-ranging Extended Producer Responsibility (EPR) program.

WestRock is a leading manufacturer of sustainable, fiber-based packaging products. We also operate one of North America's largest recycling networks, managing roughly 7.5 million tons of recycled fiber each year. In New York, we have 900 employees in family-wage jobs across 8 facilities and invest nearly \$900 million directly into the state's economy each year through salary, taxes, and supplier spend. One of these facilities is our mill in Solvay, which is one of the largest 100% recycled paper mills in the United States. Each year, the Mill diverts nearly 900,000 tons of paper from area landfills for beneficial reuse in our packaging products. Our mill's main product is corrugated paperboard, which we convert into boxes at our facilities in New York and around the world. Those boxes are 100% recyclable.

While EPR may be an appropriate program for certain hard-to-recycle materials with limited markets, it is not appropriate for paper products. Paper recycling in the United States is a success story, and markets for recovered fiber are robust and resilient. Paper products in general had an 65.7% recovery rate in 2020. That rate has been above 63% since 2009. For old corrugated containers (OCC), otherwise known as cardboard, which is the Mill's primary feedstock, the recovery rate is nearly 90%. Recent disruptions to paper recycling due to China National Sword and the COVID pandemic have been transient and minimal, in part because businesses like ours are willing to make significant investments to continue to recover fiber and make the essential paper packaging products that New Yorkers and others around the country rely on.

WestRock is a leader in advancing a circular economy and we are proud members of the Ellen MacArthur Foundation, one of the world's leading circular economy organizations. WestRock relies on a robust recycling ecosystem to support our mills and box plants, and we support efforts to enhance this ecosystem in New York. In fact, we are partnering with the SUNY College of Environmental Science and Forestry to implement New York's Recycle Right program.

We are concerned that placing our products in a potentially costly EPR program with other materials that do not share our sustainability profile will ultimately damage our business, our industry, and the jobs we provide.

Accordingly, we must respectfully oppose TED Part RR, Extended Producer Responsibility as it is currently drafted. Thank you for your consideration of our views.

Sincerely,

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Matthew Wells
Sr. Regional Manager
Government Relations