



American Forest & Paper Association

December 12, 2011

Ms. Teri Wion
California Department of Resources Recycling and Recovery
P.O. Box 4025, MS-13A
Sacramento, CA 95812-4025

Re: Mandatory Commercial Recycling

Dear Ms. Wion:

The American Forest & Paper Association (AF&PA) appreciates the opportunity to comment on CalRecycle's proposed regulations to implement the mandatory commercial recycling provisions of AB 341 that was signed on October 6th by Governor Brown. AF&PA encourages efforts by state and local governments to promote recycling that complement our industry's aggressive goals and record of success in increasing diversion of recyclable paper.

AF&PA is the national trade association of the forest products industry, representing pulp, paper, packaging and wood products manufacturers, and forest landowners. Our companies make products essential for everyday life from renewable and recyclable resources that sustain the environment. The forest products industry accounts for approximately 5 percent of the total U.S. manufacturing GDP. Industry companies produce about \$175 billion in products annually and employ nearly 900,000 people. The industry meets a payroll of approximately \$50 billion and is among the top 10 manufacturing sector employers in 48 states. In California, our industry employs more than 54,000 individuals and operates 489 manufacturing facilities. The estimated state and local taxes paid by the forest products industry totals \$318 million annually.

Recycling is one of the nation's great environmental success stories and AF&PA is a leader in promoting the recovery of fiber for reprocessing and reuse in the paper industry. In 2010, a record 63.5 percent of the paper consumed in the U.S. was recovered for recycling. In fact, paper recovery has increased 77 percent since 1990. Paper recycling reuses a renewable resource that sequesters carbon and helps reduce greenhouse gas emissions. In addition, in 2010 the amount of paper that was recovered for recycling saved 170 million cubic yards of landfill space.

In keeping with the forest products industry's legacy as a leader in sustainability, AF&PA has announced a new initiative called *Better Practices, Better Planet 2020: Continuing AF&PA's Commitment to Sustainability*. This comprehensive set of quantifiable sustainability goals is the most extensive to date for a major U.S. manufacturing industry. As part of *Better Practices, Better Planet 2020*, the industry has set a goal to further increase paper recovery for recycling to exceed 70 percent by 2020 and will be working with communities, businesses and schools to reach this goal.

CalRecycle has asked for comments on the proposed implementation of Chapter 12.8 Statutes of 2011 [Chesbro, AB 341].

AF&PA recognizes the importance of recycling, which is why our industry has voluntarily spent considerable resources – and working with our partners in the states –building the infrastructure to recover and recycle our products.

AF&PA shares CalRecycle's goals of increasing recovery rates and reducing the amount of recyclable products going to landfills. We urge Cal Recycle to be mindful of the current high recovery rates for paper, and recognize the essential role that competitive markets for recovered paper have played in achieving those high recovery rates. In working toward the state's 75 percent recovery goal, we request CalRecycle encourage cities and counties in California to avoid relying on exclusive franchise agreements or requirements that business recyclables be diverted to mixed waste processing facilities (as allowed in Section 18838 of the regulation) that could interfere with markets for recovered paper and prevent California from achieving its recovery goal.

California's ambitious 75 percent recovery goal will be achievable only through constructive partnerships between businesses, CalRecycle, local governments, and environmental groups.

AF&PA supports CalRecycle's efforts to focus on recycling education and outreach to businesses. AF&PA has a number of resources to help encourage and promote recycling in the workplace, schools and communities, including guides to starting a recycling program and lesson plans for classroom use. AF&PA also sponsors an annual Recycling Awards program to honor outstanding businesses, communities and schools for their successful recycling programs with a monetary prize and national media recognition. Case studies and details of these award-winning programs are highlighted on the paperrecycles.org website, along with additional recycling information, statistics and a variety of other resources.

Please do not hesitate to contact me if you have questions or our legislative advocate in California Kathy Lynch at (916) 443-0202 or lynch@lynchlobby.com. Thank you for your consideration.

Regards,



Cathy Foley
Group Vice President, Paper

cc: Ms. Caroll Mortensen, Director, CalRecycle