

February 27, 2025

To: Honorable Representative Heintzeman

From: PRINTING United Alliance

Re: Support of HF1371, Paper Products Exempted from the Extended Producer Responsibility Program Managing Solid Waste

Dear Honorable Representative Heintzeman,

Thank you for considering HF1371, Paper Products Exempted from the Extended Producer Responsibility Program Managing Solid Waste, for a hearing in the House Environment and Natural Resource Committee.

We strongly support responsible recycling and waste management, however, the inclusion of paper products in Minnesota's extended producer responsibility (EPR) law is not appropriate and support the passage of HF 1371. Including paper in the EPR program unfairly burdens printing operations, packaging converters, and paper-based product manufacturers and should be removed.

Including printed paper in the EPR program is not suitable given that these products already enjoy a very high recovery and recycling rate. According to the American Forest and Paper Association, 46 million tons of paper were recycled in 2023. The paper recycling rate was 65-69% and the cardboard recycling rate was 71-76%.¹ In addition, the American Forest and Paper Association reports that 60% more paper is recycled today than in 1990 when the paper industry first set recycling rate goals and about 46 million tons of paper was recycled in the U.S. in 2023, which is 126,000 tons per day.²

Paper products are one of the most desirable materials for recycling and do not pose the same environmental challenges as plastic packaging. Therefore, it is unnecessary to include them in an extended producer responsibility program. Unlike plastic, paper is biodegradable, widely accepted in municipal recycling programs, and does not contribute to long-term pollution. Regulating paper under the same framework as plastics creates redundant compliance costs.

Paper products are a renewable resource that comes from sustainably managed areas and play a vital role in ensuring other covered materials under Minnesota's EPR program such as paper-based

¹ *How much paper was recycled in 2023?* | AF&PA. (n.d.). <https://www.afandpa.org/news/2024/how-much-paper-was-recycled-2023>

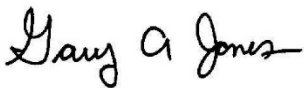
² *Paper & Cardboard Recycling*: AF&PA. Paper & Cardboard Recycling | AF&PA. (n.d.). <https://www.afandpa.org/priorities/recycling>

packaging containing high levels of recycled fiber. The inclusion of paper contradicts state and federal policies encouraging businesses to transition away from plastic toward renewable materials.

Adding unnecessary fees and compliance requirements will stifle industry growth and job creation in the printing sectors. Fees on paper-based packaging may push businesses to return to plastic-based packaging, which is a completely opposite outcome that the legislation is aimed at accomplishing.

In conclusion, we urge you to support HF1371 which excludes paper from Minnesota's EPR program and focus on materials that pose a greater environmental challenge. The printing industry is committed to sustainability and this legislation, if passed in its current form, will help avoid unintended consequences that undermine progress. Please let me know if you have any questions or would like to discuss this issue any further. I can be contacted at 703.359.1363 or gjones@printing.org.

Sincerely,

A handwritten signature in black ink that reads "Gary A. Jones". The signature is written in a cursive, flowing style.

Gary A. Jones
Vice President EHS Affairs