

March 25, 2025

To: The Honorable Marc Korman, Chair, House Environment & Transportation Committee

From: PRINTING United Alliance

Re: Oppose SB 901 – Packaging and Paper Products – Producer Responsibility Plans

Dear Chairman Korman:

PRINTING United Alliance opposes Senate Bill 901 and respectfully urges the Committee to reconsider advancing this legislation.

As background, the Alliance represents the interests of facilities engaged in producing a wide variety of printed products and packaging. We strongly support responsible recycling and waste management, however, the inclusion of paper products in Maryland's extended producer responsibility (EPR) law is not appropriate. Including paper in the EPR program unfairly burdens printing operations, packaging converters, and paper-based product manufacturers. We recommend excluding "paper products" from the bill.

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 & Paper Association (AF&PA), 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, AF&PA 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 EPR 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 Maryland's EPR program such as paper-based packaging containing high levels of recycled fiber. The inclusion of paper contradicts state

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

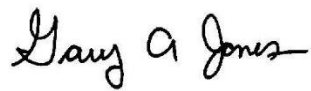
² *Paper & Cardboard Recycling*: AF&PA. Paper & Cardboard Recycling | AF&PA. (n.d.). <https://www.afandpa.org/priorities/recycling>

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 to what the legislation is aimed at accomplishing.

In conclusion, we urge you to exclude “paper products” from the material scope of SB 901 and instead, focus on materials that pose a greater environmental challenge. 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 of EHS Affairs