

January 18, 2021

The Honorable Delores G. Kelley  
3 East Miller Senate Office Building  
11 Bladen Street  
Annapolis, MD 21401

**RE: WestRock Opposition to SB65 - Electricity - Renewable Energy Portfolio Standard - Qualifying Biomass**

Dear Chairwoman Kelly and Members of the Senate Finance Committee,

On behalf of WestRock, a leading manufacturer and recycler of sustainable fiber-based packaging, I am writing in opposition to SB65 - Electricity - Renewable Energy Portfolio Standard - Qualifying Biomass.

WestRock has 190 employees across 3 facilities in Maryland, with an average salary of \$62,000. This includes a plant that I manage near Baltimore that manufactures corrugated boxes and has been in operation throughout the pandemic as a CISA-designated critical industry. **Each year, WestRock invests over \$200 million directly in the state of Maryland through supplier spend, payroll, and taxes.**

WestRock's pulp and paper mills in Virginia have been active participants in the Maryland Renewable Portfolio Standard (RPS) as a Tier 1 resource since the program's inception. All of our integrated paper mills use highly efficient cogeneration technology to produce renewable power from renewable biomass resources. Our facility near Baltimore receives a significant amount of its paperboard from our Virginia mills. Participation in the RPS supports these mills, which in turn supports the Baltimore facility.

Additionally, while these facilities are located in Virginia, **their use of biomass provides significant benefits for Maryland**, because the impact of greenhouse gasses and climate change is felt across state lines.

Specifically:

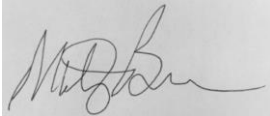
- Using renewable biomass allows our facilities to avoid the combustion of fossil fuels. Residual forest biomass is widely recognized as carbon neutral, whereas the combustion of fossil fuels is carbon accretive. Maryland should continue to encourage this through its RPS policies.
- The residual biomass used at our mills has no higher and better purpose. The alternative scenario to their combustion (landfilling) would not only result in the release of sequestered carbon, but also the release of methane. Methane is a significantly more potent greenhouse gas than carbon dioxide, so end-uses that avoid the release of methane should be encouraged through public policies such as the RPS, etc.
- WestRock's Virginia mills support the growth of Maryland's forests. We take great pride in our efforts to promote sustainable forestry. The continued operation of our mills depends on the existence of a vibrant wood basket – that wood basket includes large parts of Maryland. Each

year, we purchase thousands of tons of fiber from Maryland landowners. That fiber is used to make our products, and the residuals are used to generate credits we sell into the Maryland RPS.

A robust forest products industry provides a potent financial incentive for property owners to keep land in forest, and to properly manage those forests. That, in turn, creates significant environmental benefits. Maryland forest carbon stocks have increased by 21% from 1990 to 2019, and currently store the equivalent of 16 years of all CO2 emissions produced in the state.<sup>1</sup> Maryland should continue to encourage this through its RPS policies.

Removing renewable biomass from the state's RPS would run counter to all of these benefits and make Maryland an outlier among states with RPS's. For these reasons, we must respectfully oppose this bill.

Respectfully,

A handwritten signature in black ink, appearing to read "Marty Brown", is placed over a light gray rectangular background.

Marty Brown  
Business Unit General Manager

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<sup>1</sup> Source: Forest Resources Association: <https://forestresources.org/pdf/Maryland.pdf>