

February 24, 2022

The Honorable Christine Cohen, Co-Chair
The Honorable Joseph P. Gresko, Co-Chair
Joint Environment Committee
Legislative Office Building, Room 3200
Hartford, CT, 06106

Delivered via email

Cc: Joint Environment Committee Members

Re: Opposition to SB 115: Extended Producer Responsibility Proposal

MPA - the Association of Magazine Media (MPA) opposes SB 115 as drafted. The bill would mandate an 'extended producer responsibility' (EPR) program that would go beyond packaging to include paper products, including magazines. We are writing to share our opposition and concerns with any such proposal that would establish an unnecessary and, in our view, environmentally-detrimental mandate upon the print media industry in the state.

MPA represents about 500 magazine media brands. Our members provide trusted, edited and curated content that informs, inspires and entertains more than 90 percent of all U.S. adults. Connecticut residents receive more than 2.4 million magazine subscriptions, representing an average of 1.8 subscriptions per household. Our readers depend on our publications for reliable news and information – needed by society now more than ever. Further, magazines are an important part of the Connecticut economy, with publishers in the state directly employing around 1,000 people, with annual wages of \$88 million, plus many more freelance contractors and more than 1,800 indirect and induced jobs in Connecticut. Many employees of New-York based publishers also live in Connecticut.

We urge you to not propose an EPR program for paper products. However well-intended, such a proposal would harm magazines, newspapers and other paper users without improving recycling rates for paper products or benefitting the environment. Magazine publishers and other manufacturers of paper products are already proactively engaged in sustainability initiatives that the referenced proposal would not enhance. The proposal would simply transfer the costs of existing recycling systems from municipalities to publishers, resulting in major negative impacts to the magazine industry in Connecticut, the Connecticut economy, and to Connecticut's consumers. An extended producer responsibility program should focus on products with severe environmental impacts and

with low current recycling rates, not on products that are recyclable and biodegradable, with current recycling rates near maximum achievable levels.

Magazine publishers care about the environment: MPA’s long-standing engagement in environmental stewardship and initiatives stems from publishers’ desire to support and implement responsible, economically-sound environmental policies related to the full lifecycles of our magazine products, from raw materials to well-read copies. Although most magazine publishers provide content across a wide range of media streams, many of our readers still desire the tactile feel and enjoyment of physical magazine copies they can save and reuse over time. They may want to keep recipes, travel information for a longed-for destination, iconic cover pictures, and interesting long-form journalism.

Our readers expect us to be good stewards of the environment, and we are. Magazines are recyclable, made from environmentally certified paper, and biodegradable. Our paper is sourced from sustainable forests via certified chain of custody protocols, our inks are linseed oil based and non-toxic, our adhesives water soluble, and any protective packaging used is recyclable. MPA and its members have engaged in several industry wide campaigns to promote recycling of magazines after use.

Magazines, newspapers and the broader paper industry are already highly successful recyclers:

- Paper is 100% recyclable and has been recycled at rates exceeding 63% every year since 2009. In 2018, the most recent year with U.S. Environmental Protection Agency (EPA) published data, 68% of paper was recycled. Further, 100% of magazines unsold at the newsstand have perennially been recycled. According to the EPA, paper far exceeds other materials in recycling: 8.5% for plastics, 17.2% for aluminum, 18.2% for rubber and leather, 25% for glass, and 68.2% for paper.¹
- Magazines only accounted for 0.3% of total municipal solid waste generated in 2018, following a long-term trend of magazines having productive reuse and not being landfilled.²
- Approximately 80% of all U.S. paper mills utilize recovered fiber to make everything from paper-based packaging to tissue products to higher grade paper.
- After a period of negative market prices for recovered paper, the market is expected to slowly improve through 2023. The industry is further expected to grow at a 2.5% annual rate between 2021 and 2026.

¹ EPA, *Advancing Sustainable Materials Fact Sheet* (Dec. 2020). See https://www.epa.gov/sites/production/files/2020-11/documents/2018_ff_fact_sheet.pdf

² EPA, *Facts and Figures about Materials, Waste and Recycling*. See <https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/nondurable-goods-product-specific-data#tab-3>

EPR for paper will not help the environment or achieve any environmental goals, but will hurt the magazine and other paper products' industries. Available data shows the failure of EPR for paper:

- EPR programs in Europe do not include paper products. Several EPR programs in Canada do include paper products and the experience there is instructive. Rather than improving environmental performance and efficiency, the system in Canada demonstrates how simply shifting costs from municipalities to paper producers actually reduces the efficiency of the recovery system and increases costs. In British Columbia, recycling has not increased at forecast rates while the fees have fluctuated wildly and increased markedly. The 2020 printing paper fee of \$175 (US)/ton represented an 86% increase compared to 2019. In 2021, the fee increased dramatically once again, to \$255 (US)/ton, close to 50% over 2020 fees. These types of volatile fees would harm Connecticut print media companies and industries.
- Requiring paper to pay fees into a system that combines all products together disrupts systems that have been successful and would require magazines and newspapers to subsidize producers of less environmentally-friendly materials, thereby rewarding them for not undertaking successful recycling programs.
- Paper is not toxic, hazardous or hard to handle. Inks and adhesives used by the magazine industry have no residual negative impacts on the recycling process. In contrast, other materials take years to decompose, release toxins into the environment and can release toxic pollution if burned. These are the materials causing the majority of the problem and should be the target of EPR legislation – not paper.

We appreciate your consideration of the information presented herein, and we urge you not to not propose an EPR program for paper products in any proposal you consider. If you have any questions or comments, please contact Rita Cohen, Senior Vice President, at rcohen@magazine.org or (202) 369-1237.

Sincerely,



Rita D. Cohen
Senior Vice President, Legislative & Regulatory Policy
MPA – The Association of Magazine Media