



March 18, 2024

Commissioner Melanie Loyzim  
Maine Department of Environmental Protection  
17 State House Station  
Augusta, Maine 04333-0017

*via electronic submission*

**RE: Sonoco Comments on Maine’s Proposed Rule for the Stewardship Program for Packaging**

Sonoco values the continuing opportunities to inform the Maine Department of Environmental Protection as they develop the Proposed Rule for the Stewardship Program for Packaging. We recognize that ERP schemes take many forms across North America and the globe and are very complex to organize and launch. We also recognize and appreciate the Department has already made beneficial changes in areas including the definition of “commodity,” the removal of the term “remanufacturing facility” and in the additional clarity around the program goals and readily recyclable criteria.

**About Sonoco**

Founded in 1899, Sonoco is a global provider of packaging products. With net sales of approximately \$7.3 billion in 2022, the Company has approximately 22,000 employees working in more than 310 operations around the world, serving some of the world’s best-known brands. We are committed to creating sustainable products, and a better world, for our customers, employees and communities. The Company ranked first in the Packaging sector on Fortune's World's Most Admired Companies for 2022 as well as being included in Barron's 100 Most Sustainable Companies for the fourth consecutive year.

Sonoco has operations throughout the packaging supply chain. We are a packaging converter of a wide range of substrates, including rigid and flexible plastics, steel cans and aerosols and paper products including paper cans with metal ends. We are also a top 10 domestic recycler with 16 commercial recycling plants and 5 single-stream material recovery facilities. Finally, we are a large consumer of recovered packaging with 10 100% recycled paper mills in North America and an estimated global usage of 2,629,265 tons of recycled paper, plastic, and metal in 2022.

Our roles in the packaging and packaging recycling value chain provide us with unique perspective into the

interplay between municipalities, material recovery facilities, end markets and the converters of new products.

### **Defining Packaging Material and Readily Recyclable**

Sonoco recognizes that the Department made significant positive changes with their updates and clarifications regarding the criteria used to define packaging material types and to categorize them as readily recyclable.

However, Sonoco is concerned about the potential for confusion due to the ratio of weight targeted for recycling to the total weight requirement in 4(C)(1)(c). While we appreciate the removal of the yield requirement, we still feel there is ambiguity on how this will ultimately be calculated and its potential impact on the program goals. Across our consumer divisions that include protective solutions, rigid and flexible plastics, metal cans and aerosols and paper packaging, we believe the only product the ratio could impact is a portion of our paper cans with metal ends. Unless there are other packaging formats identified by the Department that make this criterion relevant, we recommend its removal and that the Department instead rely on Marketability and Throughput to define readily recyclable packaging.

We are dedicated to reducing the environmental impact of our packaging and to the viability of the recycling value chain and thank you for considering our views and the continued opportunities to provide comments. We hope that this process results not only in the recycling of more packaging and more packaging material types, but in a system with greater transparency and more positive environmental outcomes. Please feel free to contact Scott Byrne, Director of Global Sustainability Services at [Scott.Byrne@Sonoco.com](mailto:Scott.Byrne@Sonoco.com) for further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Byrne". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Scott Byrne  
Director, Global Sustainability Services, Sonoco