

Collect
Recycle
Innovate



National Waste & Recycling Association®

September 26, 2025

FD 36873
310116

The Honorable Patrick J. Fuchs
Chairman
Surface Transportation Board
395 E Street SW
Washington, DC 20423

ENTERED
Office of Chief Counsel
September 26, 2025
Part of
Public Record

Subject: Support for Union Pacific and Norfolk Southern Merger

Dear Chairman Fuchs,

The National Waste & Recycling Association (NWRA) appreciates the opportunity to provide comments on the proposed merger between the Union Pacific Railroad and Norfolk Southern. NWRA is a trade association that represents private-sector waste and recycling companies in the United States, and manufacturers and service providers who do business with those companies. NWRA's members operate in all fifty states and the District of Columbia. NWRA provides safety, education, research, leadership and advocacy expertise to promote the North American waste and recycling industries, and create a climate where members prosper and provide safe, economically sustainable, and environmentally sound services.

As the Association that represents the waste and recycling industry, I want to inform you that our members depend on efficient, reliable, and cost-effective rail service to meet the needs of the nation. The movement of solid waste by rail is a critical part of the nation's environmental infrastructure. It is vital for the health and welfare of the public.

We believe that the proposed merger will enhance competition and yield significant benefits, including:

- **Improved Service Reliability:** The combined network will offer more direct routes and greater flexibility, minimizing the risk of service disruptions.
- **Reduced Transit Times:** By eliminating interchanges where rail cars are handed off, the combination will remove several days from transit times, enabling faster delivery to the ultimate disposal site.
- **Increased Investment:** The transcontinental railroad will be better positioned to invest in infrastructure, technology, and equipment, further improving service quality, capacity, and safety.

We understand that regulatory review is an important part of this process, and we encourage the relevant authorities to carefully consider the positive impact this merger will have on businesses like our members

Thank you for your consideration of our perspective.

Sincerely,

Michael E. Hoffman, President
National Waste and Recycling Association

cc: Member Schultz
Member Hedlund
All Parties of Record