



FOODSERVICE PACKAGING  
INSTITUTE®

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September 26, 2017

City Council of the City of Saint Paul  
310 City Hall  
15 Kellogg Blvd. West  
Saint Paul, MN 55102

*Sent via email to: [Contact-Council@ci.stpaul.mn.us](mailto:Contact-Council@ci.stpaul.mn.us)*

**RE: Amending Saint Paul Code of Ordinance Chapter 236 - Environmental Preservation: Plastic Packaging**

Dear Council Members,

I am writing to you on behalf of the members of the Foodservice Packaging Institute, the trade association for the foodservice packaging industry in North America. Our members, which include paper, plastic and aluminum packaging manufacturers and their suppliers, represent approximately 90 percent of the entire industry. In addition, we also count over 100 foodservice operators and distributors in our membership.

The purpose of this letter is to respectfully ask that you OPPOSE the amended ordinance related to environmentally acceptable packaging, for the following reasons:

- One of the legislative findings is that “discarded packaging from foods and beverages constitutes a significant and growing portion of the waste in Saint Paul's waste stream.” While I have not seen any data specific to Saint Paul, this is certainly not the case at the national level. According to the U.S. Environmental Protection Agency's annual municipal solid waste reports, paper and plastic foodservice packaging (or “to-go” packaging, as you may call it) makes up less than 2 – yes, TWO – percent of discarded materials. This is hardly a “significant” portion. And, it's been less than 2 percent since the 1980s, when the data on foodservice packaging was first collected.



- FPI strongly opposes any government intervention in the marketplace, especially legislation that would limit the use of any foodservice packaging. Government proposals to restrict particular foodservice packaging products because of their presumed end-of-life options are particularly misguided. We believe that each foodservice package must compete in the marketplace based on its own merits of product performance and suitability, price competitiveness and, of course, impact on the environment.
- While FPI supports the use of recyclable and compostable foodservice packaging, we are concerned about what products will be considered not recyclable or compostable. For example, it is our understanding that the following may be considered non-recyclable, and we do not agree.
  - Rigid polystyrene foodservice packaging is accepted by many material recovery facilities and communities across the U.S., and there's a growing number also accepting foam polystyrene foodservice packaging (just look to neighboring McLeod County). As for end markets, there are regional end markets for the material.
  - While poly-coated paper foodservice packaging is not accepted as widely as other materials across the country, Saint Paul has a unique opportunity literally in its own backyard. The city's recycling facility has the ability to process these, and there are multiple end markets in the region interested in buying bales with these materials included. In fact, one of Eureka's most important end markets – the WestRock mill in Saint Paul – is asking for bales with recovered paper cups and containers. Given this, these items should be considered recyclable in Saint Paul.
- Some would argue that the city should narrowly limit what is recyclable or compostable to avoid consumer confusion. However, that is not necessary, and FPI has resources to help educate the city's residents. Just this year, we launched our "Resident Education Toolkit" (found at [www.recyclefsp.org/residenteducationkit](http://www.recyclefsp.org/residenteducationkit)), which offers a library of high-resolution images, suggested language and special instructions, flyer templates and more. While there may be a focus on recycling, we would welcome the opportunity to work with Saint Paul to expand the message to include both recycling and composting. After all, many forward-thinking communities offer both recycling and composting as a way to reach their zero waste goals.

We respectfully ask that you oppose this amended ordinance as drafted and instead work with us to promote recycling and composting of all foodservice packaging.

Sincerely,



Lynn M. Dyer  
President