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The Honorable Council President Russ Stark
City of St. Paul
310-D City Hall 15 Kellogg Blvd., West
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Dear President Stark,

On behalf of WestRock, I appreciate the opportunity to provide comment on the proposed City of St Paul Sustainable To Go Food Packaging Ordinance 17-29, amending Chapter 236 of the Legislative Code regarding plastic packaging.

As you know, I am the General Manager of the WestRock paper mill located in Ward 4 in St. Paul. The Mill has been in operation since 1908. We employ 380 people with an average annual wage and benefit of \$102,000 and pay \$2.2 million in state & local taxes. The mill produces 365,000 tons of 100% certified recycled fiber annually. The Mill receives the paper processed by Eureka which includes the residential collection from both St. Paul and Minneapolis.

WestRock is both a foodservice packaging manufacturer and one of the largest integrated recyclers in the United States. WestRock operates 22 recycling facilities and 23 paper mills that consume recovered fiber. WestRock has been an active participant in the City of St. Paul Sustainable To Go Food Packaging Ordinance development stakeholder process. We are also a founding member of the Foodservice Packaging Institute's (FPI) Paper Recovery Alliance whose mission is to increase the recovery of foodservice packaging.

In April, WestRock St. Paul Mill conducted a full-scale recycling trial of poly coated (i.e.: plastic lined) foodservice packaging. As we have discussed, the trial was a success, demonstrating that the inclusion of poly coated paper (hot and cold cups and containers) present no impact on our process or finished product quality. Contrary to long standing belief within the paper industry, the poly coating separated cleanly from the fiber under normal processing conditions and 100% of the fiber was recovered to be made into new products. Other mills in our industry conducting trials have had similar, successful results. We believe that routine equipment upgrades over the past decade or so have contributed to the success we are experiencing at our Mill and as an industry. In fact, three US cities will be adding foodservice packaging, including poly coated paper, to their residential collection this fall. In Chattanooga, Tennessee, WestRock and FPI have partnered with the City to add foodservice packaging to their residential recycling program beginning September 22nd.

These positive developments present the opportunity to provide quick service restaurants in St. Paul a recycling option for poly coated paper packaging, whereby poly coated paper (PE plastic lined) would be considered environmentally acceptable, recyclable packaging for the purposes of compliance with the Ordinance.

WestRock has discussed this opportunity, and the St. Paul Mill's willingness and ability to recycle foodservice packaging, at length with City of St. Paul officials, St. Paul City Council members, and Eureka Recycling.

Some logistics and benefits we see of providing a recycling option for paper foodservice packaging include:

- Allows restaurant owners flexibility to determine the best packaging solution and end of life option for their situation (reusable, recyclable, compostable).
- Allows more packaging choices (which also usually equates to lower cost).
- "Highest and Best Use" for paper packaging is recycling; paper can be recycled multiple times.
- Life-cycle data shows that for most life-cycle indicators, including greenhouse gases, recycling poly coated paper is preferable to composting PLA coated paper even when considering potential additional food waste composted.
- Compostable paper packaging (e.g.: PLA coated) can also be recycled.
- While we prefer plastic lids be removed from paper cups and containers, they do not pose a problem in our process and the plastic is removed with other contaminants routinely present in paper bales.
- Largest share of foodservice packaging is disposed of in the home. Residential organics collection has not yet been implemented in St. Paul.
- Eureka holds the residential recycling contract for both St. Paul and Minneapolis so the list of acceptable recyclable packaging can be same.
- WestRock can accept foodservice packaging as part of current mixed paper stream, no additional sorting is required.
- At least three markets for Paper Foodservice Packaging exist. Specifically, Fox River Fiber (currently takes aseptic and gable top cartons from Eureka) and Georgia Pacific located in GreenBay area.
- Compostability claims on compostable packaging make differentiating it straightforward for consumers.

As you consider the City of St. Paul Sustainable To Go Food Packaging Ordinance, I encourage you to allow restaurant owners the option to recycle paper foodservice packaging, rather than requiring all paper packaging to be composted. Given that local and regional end markets exist, and no additional sorting is required, adding it to the list of packaging accepted in the residential recycling stream should be very straightforward.

Thank you, again, for the opportunity to comment on the proposed Ordinance. We appreciate your consideration.

Sincerely,



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cc:

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