



**American
Forest & Paper
Association**

October 3, 2017

The Honorable Russell Stark
City Council President
City of St. Paul
310-D City Hall 15 Kellogg Boulevard, West
Saint Paul, MN 55102

Dear Council President Stark:

On behalf of the American Forest & Paper Association (AF&PA)ⁱ, I appreciate the opportunity to share our perspective on the proposed ordinance to amend Chapter 236 of the Legislative Code regarding plastic packaging.

AF&PA, along with other paper industry representatives, appreciates the opportunity to have participated in the city's stakeholder process to share our perspective on paper foodservice packaging. The industry applauds the city's move to the residential cart system in January to increase the amount of recyclables recovered for recycling. AF&PA and many of its members are proud supporters of The Recycling Partnership. The Recycling Partnership supported the cart roll-out with grant dollars, technical assistance, and educational resources.

The paper industry's voluntary efforts have resulted in a consistently high recovery rate. In 2016, 67.2 percent (or more than 52 million tons) of all paper consumed in the U.S. was recovered for recycling, and the recovery rate has met or exceeded 63 percent for the past eight years. Nearly three times more paper is recycled than is sent to landfills and the annual paper recovery rate has more than doubled since 1990, making it a true environmental success story. The current collection, processing and utilization of recovered fiber occurs in a manner that enables it to go to its highest value end use as feedstock to manufacture new products, whether that is recovery for recycling or composting.

As written in the proposed ordinance, commonly used paper-based food and beverage packaging may not be considered "environmentally acceptable packaging" because these products currently are not accepted in the city-approved residential recycling contract. Specifically, certain hot beverage cups and other containers are not accepted in the residential recycling program because they are not widely recycled or composted due to the polyethylene lining of the cup. Meanwhile, AF&PA member WestRock, which receives the paper collected from the St. Paul and Minneapolis residential recycling programs, has conducted recycling trials and affirmed to the City and other stakeholders its ability to recycle and willingness to accept poly-coated paper foodservice packaging. Additionally, other mills in regional proximity

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to St. Paul have indicated their ability and willingness to recycle it, thus, ensuring multiple end-markets for bales of paper containing foodservice packaging.

The Council's exclusion of these cups and other foodservice packaging products is placing undue burden on the quick service restaurants and other businesses using paper-based packaging. To comply with the proposed ordinance, as currently written, businesses and restaurants serving food for immediate consumption would be forced to switch to a more expensive compostable paper-based package or plastic. Since a recyclability option for commonly used poly-lined paper foodservice packaging exists, St. Paul businesses should be granted the flexibility to choose the recyclable or compostable packaging best suited to their operations.

We encourage you to work with the city's residential recycling processor to include paper-based foodservice packaging as an acceptable recyclable. Additionally, we encourage you to avoid measures that penalize paper and, as always, we stand ready to assist you and offer our expertise as a resource as you continue the dialogue on this important issue. If you have any questions, please contact Gretchen Spear, AF&PA's Director of Government Affairs at (612) 926-8037 or gretchen_spear@afandpa.org.

Sincerely,



Elizabeth Bartheld
Vice President, Government Affairs

cc: Mayor Chris Coleman
St. Paul City Council Members
Dan Niziolek, Deputy Director, Department of Sanitation and Inspection
Ann Hunt, City of St. Paul Policy Director
Kris Hageman, Recycling and Solid Waste Program Manager, City of Saint Paul

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The American Forest & Paper Association (AF&PA) serves to advance a sustainable U.S. pulp, paper, packaging, tissue and wood products manufacturing industry through fact-based public policy and marketplace advocacy. AF&PA member companies make products essential for everyday life from renewable and recyclable resources and are committed to continuous improvement through the industry's sustainability initiative - *Better Practices, Better Planet 2020*. The forest products industry accounts for approximately 4 percent of the total U.S. manufacturing GDP, manufactures over \$200 billion in products annually, and employs approximately 900,000 men and women. The industry meets a payroll of approximately \$50 billion annually and is among the top 10 manufacturing sector employers in 45 states.

In Minnesota the forest products industry employs more than 24,000 individuals, with an annual payroll of over \$1.5 billion. The estimated state and local taxes paid by the forest products industry totals \$104 million annually.