

October 10, 2017

City of Saint Paul City Council  
15 Kellogg Blvd West  
St Paul MN 55102

Dear Council Members:

The State of Minnesota and the City of St Paul have both established aggressive source reduction and recycling goals. The state's Metropolitan Solid Waste Management Policy Plan calls for us to reduce waste by 5% from projected totals. The Waste Management Act includes a goal of recycling 75% of municipal solid waste (MSW) by the year 2030. To meet these goals, it will be important to prioritize prevention efforts, improve existing recycling programs and to establish successful organics recycling efforts.

The proposed ordinance addresses reusable and returnable, recyclable, and compostable food and beverage take out packaging. All three of these aspects of packaging fall above disposal on the waste management hierarchy, and the Minnesota Pollution Control Agency (MPCA) agrees they are the preferred types of packaging, so long as appropriate systems are in place for recovering the material after use.

Having those appropriate systems in place is critical for the benefits of the proposed policy to be realized. If businesses switch to compostable packaging, but citizens do not have convenient access to curbside organics, recycling the packaging will still end up in trash bins. Given this dynamic, the MPCA's support for the ordinance is conditional. We support the push to use compostable packaging provided it is implemented after (or along with) a curbside organics collection program.

Packaging is an important consideration when a community is striving to meet aggressive MSW recycling goals. The U.S. Environmental Protection Agency estimates that containers and packaging accounts for nearly 30% of the MSW generated in the nation. In 2014, packaging accounted for more than 76 million tons of waste nationally. Unfortunately, only half of that material was recycled in part because many of the products that fall into the category have limited recycling markets and because it can be confusing to consumers to know what products are acceptable for their local recycling program.

Making a deliberate effort to consider what type of waste we generate is an important strategy. We know the greatest net environmental benefits come from preventing waste. As such, we hope an effort will be made to prioritize and incentivize the use of reusable or returnable packaging. When use of those products is not feasible, utilizing takeout food packaging that is light-weighted and recyclable or compostable is the next best option.

Including compostable packaging in the ordinance definition of "environmentally acceptable packaging" is accurate when the community has widespread organics recycling programs. Ensuring that compostable products are recovered in organics recycling programs is essential for their use to be beneficial.

In closing, the agency applauds the City's efforts to design a better system. Thinking about the type and quantity of waste we generate is an essential aspect of truly sustainable programs. Well run collection programs are only one component of successful waste and recycling programs. Recognizing that we have control over the type of waste we create and taking proactive steps to do better is commendable.

Sincerely,

A handwritten signature in black ink, appearing to read "David J. Benke", with a long horizontal line extending to the right.

David J. Benke  
Division Director  
Resource Management & Assistance Division

DJB/TF:je