



February 18, 2019

The Honorable Chris Tolbert  
St. Paul City Council  
310C City Hall 15 Kellogg Blvd. W.  
St. Paul, MN 55102

**Re: Sustainable To-Go Ordinance**

Dear Councilmember Tolbert:

Thank you for the opportunity to comment on the proposal to amend Chapter 236 of the Legislative Code regarding plastic packaging.

The Minnesota Restaurant Association has served the needs of the restaurant and foodservice industry since 1933 and currently has more than 2,000 restaurants in membership and 300 Allied (vendor) members that support the industry. The Minnesota Lodging Association was formed in 1931 and has 350 hotels, motels and B&B's in membership and some 100 Allied members. Minnesota has proudly led the nation in recycling rates and has invested millions of dollars in waste recycling programs and infrastructure. New regulations regarding recycling should allow Minnesota businesses to remain competitive and not undermine the current recycling infrastructure. Mandates and bans on foodservice packaging are not the most environmentally or economically responsible approach to managing foodservice packaging disposal.

The hospitality industry has been actively engaged in recycling and sustainability programs such as Minnesota Waste Wise for many years. The purpose of Minnesota Waste Wise is to increase recycling and waste prevention efforts. Minnesota Waste Wise provides sustainability consulting, site visits, waste sorts and education training for employees and is a great example of a business-led initiative that creates quantifiable results.

Hospitahty Minnesota respectfully requests that the Council not pass the proposed amendments to Chapter 236 until the city has an opportunity to better mitigate the significantly higher costs to small businesses for replacement products, as well as the potential recyclability of these products. Here is our reasoning:

- **Recyclability of Foodservice To-Go Packaging Products.** The goal of the "Sustainable To-Go" ordinance is to transition St. Paul businesses to "environmentally acceptable" to-go packaging that is either "reusable, recyclable, or compostable." However, technology already exists to recycle many foodservice to-go packaging products. For example, Polyethylene-lined cups are recycled in other locations around the country and at least one Twin-Cities entity has successfully demonstrated its ability (and indicated its willingness) to recycle these products locally. Furthermore, Polystyrene products are also recycled at other locations around the country, including in neighboring Iowa. Developing a Twin-Cities infrastructure for recycling

these products would have the additional benefit of providing residents with a recycling option for these materials, rather than sending them to the landfill or incinerator.

Additionally, compostability is substrate-dependent, requiring waste collection and management systems that ensure that “compostable” material ends up in an environment within the waste stream where it will actually compost. We urge the city to take the necessary time to work with its partners to develop these recycling options for businesses and residents in St. Paul. Given some of the capacity concerns regarding composting and the advantages of recycling, this seems like a reasonable approach to achieve the city’s long-term goals of reducing waste.

- **Higher Costs Constitute a Hardship for Small Businesses.** Hospitality Minnesota is concerned that the significantly higher costs for alternative products may constitute a financial hardship for small business that operate on very thin margins. We are concerned that the Council is proposing to move ahead without completing a more robust analysis of the current economic impact on these small businesses in the city. It is our understanding that in many cases, the cost for replacement products continues to be more than double. We are concerned that the city has not adequately addressed these problems and all parties would benefit from more time to explore solutions. In addition, there are currently technological efforts underway, such as the NextGen Cup challenge, (see <https://www.nextgenconsortium.com>), to create low-cost recyclable and compostable to-go products that will significantly reduce the cost and increase the availability of alternative products. Allowing these advancements and cost reductions to drive the market strikes a reasonable balance between the needs of small businesses and the city’s waste management goals, without unduly placing a financial hardship on such businesses.

Hospitality Minnesota appreciates the significant efforts of the City of St. Paul to promote recycling, reduce waste, and improve environmental sustainability. Hospitality Minnesota would be happy to participate in additional forums, information sharing, etc. to better inform sustainable solutions to these problems. We look forward to working together to address the above-mentioned concerns in order to develop long-term solutions that achieve the city’s stated goals of supporting its vibrant small business community and improving the lives of its residents through better waste management practices.

Thank you for your consideration. Please feel free to contact me if you have any questions.

Sincerely,



Liz Rammer  
President & CEO  
Hospitality Minnesota