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The Honorable Council President Brendmoen  
City of St. Paul  
310-D City Hall 15 Kellogg Blvd., West  
Saint Paul, MN 55102  
[ward5@ci.stpaul.mn.us](mailto:ward5@ci.stpaul.mn.us)

Dear President Brendmoen,

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.

WestRock's recycled paper mill in St. Paul produces 330,000 tons of 100% certified recycled fiber annually. 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 recycles the residential mixed paper collected from the cities St. Paul and Minneapolis. WestRock was an active participant in the City of St. Paul Sustainable To Go Food Packaging Ordinance development stakeholder process.

WestRock also manufactures both recyclable and compostable foodservice packaging and is one of the largest integrated recyclers in the United States. WestRock operates 22 recycling facilities (materials recovery facilities) and 28 paper mills, the majority of which consume recovered fiber. 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, and a funding partner and board member of The Recycling Partnership.

As you may recall, in 2017, WestRock St. Paul Mill conducted a full-scale recycling trial of poly-lined foodservice packaging. The trial was a success, demonstrating that the inclusion of poly lined paper (hot and cold cups and containers) presented no impact on our process or finished product quality. Since this trial, WestRock has publicly announced that it will accept foodservice packaging at its eight 100% Recycled Paperboard Mills (including its mill in St. Paul). In addition, two of WestRock's recycling facilities (Chattanooga, TN and Louisville, KY) have been accepting foodservice packaging for over a year (including poly lined cups and containers). Other recycled paper mills in the industry have also announced acceptance of poly-lined paper packaging (**see attached list for poly-lined cups**). Many of these mills are within an accessible distance of St. Paul. Of note, over the last 18 months poly-lined foodservice packaging has been introduced to recycling programs in San Francisco, Washington DC, and Denver adding to the dozens of cities that have been accepting it for many years (e.g.: Seattle, New York city).

**These developments demonstrate that it is possible to provide City of St. Paul restaurants and residents a recycling option for their poly-lined paper foodservice packaging.**

**Recyclable packaging equates to lower costs and lower environmental impacts than compostable packaging.**

Including recyclable paper packaging allows restaurant owners flexibility to determine best packaging solution and end of life option for their situation (reusable, recyclable, compostable). Providing more packaging choices will equate to lower compliance costs.

Recycling packing results in lower environmental impact than composting. The 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 taking into account potential additional food waste composted and the inability to recycle the polymer lining.

New coatings that will replace the poly lining and are both recyclable and compostable are in development which will allow even more flexibility. This means that decisions on whether to recycle or compost a particular package can be made based on food residue levels rather than type of barrier coating.

**As written, the Ordinance reinforces the recycling status quo and creates an unlevel playing field for paper packaging which will result in the use of more plastic packaging.**

There is currently no incentive for processors contracted by the City to consider adding new materials to their program. There needs to be fair and formal process for evaluating and approving recyclable packaging rather than relying solely on packaging included in the current city contract. City contracts may not represent the latest packaging materials and processing technologies, and are only revisited every five years.

Allowing a recycling option for plastic packaging but not paper packaging, creates an unlevel playing field for paper packaging. The relatively high cost of compostable packaging will result in an increase in the use of non-compostable plastic packaging by St. Paul foodservice establishments.

Teaching consumers to distinguish between compostable and recyclable packaging via labeling is behavior that should be reinforced. Under the Ordinance, residents are asked to make the distinction between compostable and recyclable plastic packaging; paper packaging should be treated in the same manner.

Revisions to the ASTM D6868 and BPI certification standards have reduced the eligibility of many compostable paper-based packaging constructs, in turn reducing the number of compostable paper packaging options available to meet compliance obligations under the Ordinance.

**Several changes to the Ordinance are needed to ensure that city businesses are afforded the choices available to them and to ensure that paper packaging is not placed at a competitive disadvantage in favor of plastic packaging.**

1. **The definition of recyclable packaging should be expanded** to include packaging that has been evaluated and approved by the Director as environmentally acceptable.
2. **Section 236.10 establishing an Advisory Committee should be reinstated.** Among other important functions, one of the stated responsibilities of the Advisory Committee is "Assisting in efforts to expand the city's recycling program to include the collection of potentially recyclable materials not presently collected.
3. **The definition of compostable packaging should be expanded** to include more internationally recognized standards and certifications to ensure broad availability of compostable packaging.

*Compostable packaging shall mean packaging materials that are separable from solid waste, by the generator or during collection for the purpose of composting, for which there are city-approved contracts for collection for composting in an organized and approved program, /or can be certified as compostable under the standards and requirements of the Biodegradable Products Institute or the Compost Manufacturing Alliance, or can demonstrate compliance with American Society for Testing Materials Standards D6400 or D6868, International Organization for Standardization Standard 18606, or European Standard 13432.*

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 poly-lined paper foodservice packaging. Recycling is not only a superior choice environmentally, ensuring robust packaging choices are available to the market helps keep compliance costs low for local businesses. To that end, it is also critical to amend the

Ordinance to expand the definitions of both recyclable and compostable packaging to ensure broad packaging choices are available, and to establish an Advisory Committee to allow for fair and formal implementation processes.

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

Sincerely,

A handwritten signature in black ink that reads "Rhea Hale". The signature is written in a cursive, flowing style.

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Attachment



FPI has assembled a list of US and Canadian end markets that have confirmed their acceptance of post-consumer poly-coated (i.e. PE-coated or PLA-coated) paper cups in commonly traded commodity bales. This listing is provided for reference only. Generators should contact end markets directly or via their broker to determine specifications and terms.

### Mixed Paper Markets

*The following mills purchase residential mixed paper bales containing paper cups.*

Graphic Packaging International, Battle Creek, MI  
 Graphic Packaging International, East Angus, QC  
 Graphic Packaging International, Middletown, OH  
 Graphic Packaging International, Kalamazoo, MI  
 WestRock, Aurora, IL  
 WestRock, Battle Creek, MI  
 WestRock, Chattanooga, TN  
 WestRock, Dallas, TX  
 WestRock, Eaton, IN  
 WestRock, Missisquoi, VT  
 WestRock, St. Paul, MN  
 WestRock, Stroudsburg, PA

### Polycoat / Carton Markets

*The following mills purchase bales containing paper cups along with aseptic and gabletop cartons.*

Great Lakes Tissue, Cheboygan, MI  
 Resolute, Fairmont, WV  
 Sustana (Breakey Fiber), Levis, QC  
 Sustana (Fox River Fiber), DePere, WI

*If you would like to suggest an additional end market for addition to this list, please contact [recyclefsp@fpi.org](mailto:recyclefsp@fpi.org). An interactive map of end markets for other commodities, and additional resources on recovery of foodservice packaging are available at: [www.recycleFSP.org](http://www.recycleFSP.org).*