

# BIG BUSINESS EXEMPT - FAIR?

**"All people, no matter their background or economic status should have a fair shake in life and opportunity to belong." -Paul Wellstone**

## LARGE CORPORATIONS EXEMPT



Hormel  
\$9.3 Billion



Smithfield  
\$14.3 Billion



Oscar Mayer  
\$1 Billion



Hillshire Farms  
(Tyson)  
\$4 Billion



Johnsonville  
\$1 Billion



Aveda (Estee Lauder)  
\$11.8 billion



Vaseline (Unilever)  
\$60 billion

## SMALL BUSINESSES MANDATED



St. Paul  
Small Business



St. Paul  
Small Business



St. Paul  
Small Business



St. Paul  
Small Business



St. Paul  
Small Business

**What incentive does a small business have when we are branded as inferior and made victims of legislation that DISCRIMINATES against us as second class citizens? THIS MAKES NO SENSE!**

**City of St. Paul is proposing an ordinance to MANDATE A BAN on "Take Away Containers" to SMALL BUSINESSES ONLY. LARGE CORPORATIONS WILL BE EXEMPTED.**

**Please contact your:**

**PLEASE SAY NO!**

**To "Chapter 236 Environmental Preservation: Plastic Packaging Ordinance"**

**SAY NO! TO THIS AMAZINGLY UNFAIR LEGISLATION  
AND POTENTIAL IRREVERSIBLE HARDSHIP.**

**WHERE:** City of St. Paul City Hall - 3rd Floor Council Chambers • 15 West Kellogg Blvd

**DATE:** March 6, 2019

**TIME:** 4:00 PM



SPECIALIZED ENVIRONMENTAL TECHNOLOGIES, INC.  
DBA – The Mulch Store

March 6, 2019

City of St. Paul City Council  
15 Kellogg Blvd. West  
St. Paul, MN 55102

Dear Council Members,

Specialized Environmental Technologies, Inc. (SET) is the largest composter in Minnesota dedicated to advancing the composting of organic materials, including food residuals and other compostable products. We are also the closest Source Separated Organic Material (SSOM) facility to the City of St. Paul that could potentially receive those materials for processing. We strongly encourage you to support St. Paul's 'Sustainable to Go' efforts to help reduce the amount of organic materials entering our landfills. This is a great advancement, especially if the city wants to expand organics and food scrap collections in the future to more areas. By adopting this ordinance you would be taking the next steps in a fully sustainable system of waste diversion which will allow composters to create a beneficial compost product that can help the environment in so many ways. However, the current elimination of the BPI certification, along with the requirements of ASTM D6400 & D6868 from the ordinance, can ultimately hurt and possibly destroy all of your efforts to make this work in any current or future SSOM compost facility. We strongly recommend the ASTM and BPI language be left in the proposed ordinance.

It is SET's commitment to continue developing both a system that is fully sustainable and one which closes the loop on composting of all organic material including single-use compostable products. Without including compostable 'To Go' containers, bags, food service-ware, or packaging it will be very difficult to capture a big portion of the food residuals making it hard to meet the current requirements for diversion set forth by the State. When current diversion programs use a multitude of compostable and non-compostable containers or packaging, including ones claiming to be biodegradable or any likes of the terms with no scientifically based standard, it is very difficult for consumers to dispose of organic waste in the proper collection systems. If these products are not clearly labeled as compostable and do not meet the current standards of BPI or either of the ASTM compostable standards, **we do not want the material coming to our sites for processing.** Efforts of collection not utilizing these standards or requirements leads to a large amount of contamination that the composter must deal with during processing or is forced to reject loads and send them to a landfill.

We are also just now learning more about PFAS coatings on certain 'To Go' paper products that could potentially be harmful to the environment. BPI has measures in place to restrict and then eliminate the use of fluorinated chemicals in the products and packaging it certifies for compostability. As a company committed to improving our world, we feel obligated to do our best to eliminate confusion to consumers and keep these products from contaminating our sites or end products that we want to sell to consumers. Newer studies are showing that these products tend to fragment into smaller pieces called micro-plastics, and do not turn into something beneficial to the environment. When these products fragment, they just become harder to see with the naked eye and

could stick around forever. It is a must to keep the language as it was and make only BPI or ASTM certified compostable products acceptable because they are tested to break down fully in an industrial compost system. The city would be creating a loophole for plastic manufacturers by opening the door to many products that should be disposed of in a landfill only.

When non-compostable materials enter the organics recycling stream they are very hard to separate from the system before and/or after the composting process has happened. This contamination ultimately increases the overall cost of composting operations significantly because the composter is required to dispose of them into a landfill. The fragmented plastic that can't be screened out results in a finished compost product that will have some sort of contamination, albeit small amounts, remaining after processing. This renders a less valuable or desirable product for many of the current compost markets in the state, and could potentially make a product that is not helping environment clean up efforts when applied back into the soil. Most finished compost products are currently used in organic farming, landscaping, stormwater management and for amending soils to filter runoff for our lakes and streams. It is also used in municipal infrastructure projects by cities or counties where it was generated, in home gardens, on sports fields and in many other beneficial applications across the state. The last thing we want is to reintroduce non-compostable inert materials back into the places we are trying to save and protect.

Cities that have bans on non-compostable packaging materials help us by cleaning up our intake material and come closer to making the system a viable solution to organics recovery. Our intentions of building a sustainable system must revolve around the idea that we are diverting a resource for reuse rather than categorizing organic composters as managers of trash. Without the removal of non-compostable materials that are considered trash in our compostable waste stream, we will continue in a system that will eventually fail to work because of how we are regulated and will result in a business system that is not economically sustainable due to costs.

Please feel free to contact me if you have any questions. Thank you and we hope you continue to support the recycling and composting industries in Minnesota.

Sincerely,

Chuck Joswiak