

October 28, 2013

Mr. Wayne Gjerde  
Minnesota Pollution Control Agency  
520 Lafayette Road N  
St. Paul, MN 55155

Dear Mr. Gjerde,

Thank you for the opportunity to submit comments regarding the MPCA's Container Deposit study on behalf of the Minnesota Beer Wholesalers Association (MBWA). Any action taken as a result of this study would have a huge impact on the members of MBWA. Our members are strong advocates in the cause to ensure recycling programs succeed in Minnesota. It is our belief that maximizing recycling efforts help sustain a healthy environment and a healthy economy.

We do, however, have serious concerns about a container deposit program. Chief among those concerns is cost to consumers. However, many other potential problems exist like erosion of the current recycling infrastructure which would be adversely affected by pulling out containers from the recycling stream. Border issues without question arise, again related to cost to consumers and loss of business for Minnesota retailers. Fraud will undoubtedly be a problem as border state consumers will take advantage of buying cheaper products in neighboring states and return those containers for refunds in Minnesota, a loss for small business owners and for taxpayers.

While we understand the legislature's directive to study the impact a container deposit program would likely have, we hope your agency will be diligent in dissecting the impact to recycling programs overall before a final product is sent to the legislature. Minnesota enjoys some of the highest recycling rates in the country at present and while a container deposit program would likely increase recycling rates for those containers, the negative impact to other products like glass, paper, etc. would undoubtedly be great. If the goal is to increase recycling rates statewide, a far better approach would be to continue to educate producers and consumers on the benefits current recycling programs have. In addition, we should continue to study the programs that are working now and implement ways to make them better. The Minnesota Beer Wholesalers stand ready to assist in efforts to continue to reach these goals.

Sincerely,

Mike Madigan  
President, Minnesota Beer Wholesalers Association