



Carton Council

Wayne Gjerde
Recycling Market Development Coordinator
Minnesota Pollution Control Agency
520 Lafayette Road N
St. Paul, MN 55155

January 21, 2014

RE: Carton Council Comments and Recommendations on Draft Study: Recycling Refund System Cost Benefit Analysis

Dear Mr. Gjerde,

On behalf of the Carton Council, we are writing to convey our continued concern regarding the recycling refund system for beverage containers under consideration by the Minnesota Pollution Control Agency (MCPA) and as described in the Recycling Refund System Cost Benefit Analysis draft report just released.

1) Carton Council respectfully opposes the recycling refund program for beverage containers

As indicated in our prior comments sent on the program design (November 4, 2013), the Carton Council shares the state's goal of increasing recycling of beverage containers and is dedicated to working with the state and broad stakeholders towards that end. The Carton Council believes that the environmental performance of beverage cartons (both shelf-stable and refrigerated cartons) can be an important contributor (and model) for minimizing the impact of beverage containers at all stages of the container lifecycle, including recovery. As well, the Carton Council believes that our industry sector's voluntary efforts to increase access to carton recycling represent a strong model for collaboration between industry and public agencies in building the infrastructure needed for increased recovery. The Carton Council also believes that similar models of industry and public agency collaboration will be the key to actual increases in real "on-the-ground" recovery, not just for cartons but across the board in packaging as well as printing and writing papers.



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Finally, expanding our focus and efforts to away from home streams is a key component to Carton Council's strategy. Carton recycling is a natural fit for schools where large volumes of cartons are generated. Adding carton recycling programs to schools, using a set of best practices, grants and proper education tools, has helped divert even more cartons from the waste stream.

The success we have demonstrated (as outlined in our November 4, 2013 communication) is what has convinced us to take a strong position in advocating for more cost-effective approaches that use existing proven and optimized systems of collection and recycling. Overall, the Recycling Refund System Cost Benefit Analysis clearly shows that beverage containers represent only a small fraction of the waste stream. Singling out beverage containers with a recycling refund system is not the most cost-effective way to increase recycling of all commodities. A broader framework addressing all solid waste should be the way forward.

In this context, we are opposed, under any circumstances, to cartons being included in such a system. In fact the program as proposed would directly undermine the Carton Council's voluntary efforts that have been directed at building on the foundational strengths already in place for recovery programs in Minnesota. We believe that this foundation is very strong with many assets that should be maximized before a major change like a recycling refund system (or EPR for that matter) is considered for the state.

2) Carton Council supports an effective and efficient recovery framework that builds on and enhances voluntary recycling

The Carton Council is active in states across the country in promoting carton recycling access and recovery. The above statement that Minnesota's foundation for maximizing recovery is strong is based on this national exposure to a very wide range of programs and approaches. You know your programs and policies well, but we would just like to highlight some of your strengths that we feel position the state to reach best-practices in recovery – strengths the Carton Council wants to continue to build on. These programs, policies and regulations – at both the state and local level, include:



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- Target Recovery Goals (state)
- Mandatory Residential Recycling (state)
- Disposal Bans (local)
- Unit-Based Garbage Pricing – and Similar Incentives for Recovery
- A Supporting Funding Mechanism – the Solid Waste Management Tax (SWMT)

In our own research on best practices in programs, policies and regulations, these are just a few of the “tools in the tool-box” of effective approaches to growing expanded and efficient recovery. At the Carton Council we call these best practice tools “VPR+” and “VPR++” - meaning voluntary producer responsibility (the “VPR”) that builds on best practices in program and service delivery combined with effective public sector policies and regulations (the “+” of VPR+) and effective funding mechanisms that support public and private collaborations around recovery (the “++” of VPR++).

One of the most significant findings of that research is that it takes a recipe of the right mix of these best practices to find Minnesota’s unique “sweet spot” that will boost recovery to a much higher level. A few examples – a) targets and goals can be applied across a suite of recyclables that should be common to all programs across the state; b) mandatory recycling requirements can be generator specific – outlining how all types of generators (types of residential as well as types of institutional, industrial and commercial) as well as their service providers (e.g. contracted hauler) need to provide recycling access; and c) statewide disposal bans on many of these common recyclables can require their removal from waste and placement in the recycling system – sending a clear message that the recycling system is to be used. These specific approaches may not be just right for Minnesota but they represent just a few of the examples of adjustments and tweaks that can be made to an already strong program to drive that push for higher recovery.

The Carton Council is committed to working with the state of Minnesota and public and private industry partners towards this mission and is ready to both share our research and engage in the dialogue and work required to help bring the next level of best practices to your recovery efforts across the state.



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We think the Carton Council's actions in Minnesota to date demonstrate our commitment as well as the success of our approaches. We would welcome the opportunity to work with you to bring this next level of performance into reality.

In summary, the Carton Council respectfully recommends rejecting the proposed recycling refund approach and instead encourages state leaders to move forward with best practice programming, policies and regulations as described above – what we call VPR+ and VPR++. We look forward to an opportunity to expand on these points and provide additional input and resources towards pro-recovery efforts that rely on strong collaborative and well-coordinated contributions from both industry and public agencies. We believe this is the right way, the most efficient and effective way, to reach higher recovery levels of beverage packaging as well as other packaging and printing and writing papers. If you have questions, please contact Carton Council Government Affairs staff, Elisabeth Comere at (224) 587 0819 or Elisabeth.comere@tetrapak.com.

Yours sincerely,

Elisabeth Comere
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