

Minnesota Pollution Control Agency  
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The Minnesota Reusables Coalition (MRC) develops and supports **infrastructure, policies,** and **partnerships** to advance reusable foodware and packaging systems within the state of Minnesota. Our vision is for reusable and refillable foodware and packaging to flourish as cultural norms, replacing current single-use systems. We also seek to ensure that Minnesotans of all demographics understand the benefits of reuse compared to single-use and know where and how to utilize reusables.

Our goals are to:

- Identify **infrastructure** needs and pursue opportunities to secure resources for enabling widespread and diverse reuse systems.
- Advocate for **policies** that support and reduce barriers to the use of reusables in foodservice operations.
- Build collaborative **partnerships** between public and private stakeholders to amplify reuse systems.

It is with this purpose and these goals in mind that we are providing comments on MPCA's Metro Solid Waste Management Plan 2022-2042. Overall, the MRC supports the greater emphasis on and commitment to reuse in the draft policy. While recycling and composting are important, the lack of funding for and policy focus on reuse for the past four decades has put our state in a position where a significant shift is necessary, especially when it comes to food and beverage packaging.

**The MRC supports Strategies 18, 20, 26, and 27.**

**18. *Grants and rebates to transition to reusable food and beverage service ware.***

Assisting businesses and organizations with the transition to reusables is key to creating a strong reusable-based society. For too long we have incentivized single-use. Supporting the switch to reusable items will ultimately decrease the overall environmental impact of products, as well as the amount of material being discarded, including for recycling and composting. Fortunately several counties and Minnesota Waste Wise (through the MNimize program) are already offering programs to assist in this shift. An expansion throughout the metro would help to support the MRC's vision of reusables being a normalized and expected part of on-the-go dining experiences.

**20. Reusables at county and city-led events.**

We strongly support the use of reusables at events put on by counties and cities, and would like to see this moved to the required strategies. If the state is going to ask residents and businesses to implement reuse, it is imperative that local and county governments lead by example. Further, this is an opportunity to engrain reuse as a cultural norm for the public. We recognize this may require a phased approach, but it should be required.

**26. Establish tracking mechanisms for waste prevention and reduction.**

While tracking waste prevention and reduction efforts is certainly more nuanced than tracking weights of materials recycled or composted, ensuring counties have the ability to report this data in a meaningful way is an important tool for moving the needle toward reuse. For example, if counties are required to have grant programs (Strategy 19), including data from grantees who switch from single-use to reusables would be one opportunity for tracking impact. We would also support the creation of uniform data tracking mechanisms across the metro to make the process easier for businesses with locations in multiple counties.

**27. Financial strategies and incentives research.**

While this strategy is somewhat vague, learning from others who have done similar work would be a useful way to determine best ways to incentivize use of reusables, both by businesses and individuals.

**The MRC does not support Strategy 21.**

**21. Mandatory charge for single-use items.**

While we understand the idea behind utilizing fees to motivate behavior change, the MRC does not support this strategy as written for several reasons. Fees are complicated at best and ensuring equitable impacts is challenging. Many factors need to be taken into consideration before determining if such a policy would not cause overly burdensome impacts on lower-income communities in particular.

Beyond equity, such an ordinance would have limited impact for incentivizing reuse. The draft policy plan provides the Minneapolis "Bring your own Bag" ordinance as a comparable example, but it is only relevant in comparison to cups. Under federal and state food code, individuals can bring beverage containers, but cannot bring their own reusable containers for a restaurant to use for takeout food. Only customers can touch food containers, so it is only useful for plate leftovers. Unless the code changes and the Minnesota Department of Health adopts the updated code (a multi-year process at best) or a restaurant completely switches to reusables for to-go/takeout, this policy would mostly just impact customers who have no choice.

Finally, we also oppose this strategy because it recommends that these local ordinances only allow BPI-certified items when single-use products are utilized. This is problematic for the following reasons:

- *Inappropriately prioritizes compostables.* According to the materials (aka “waste”) management hierarchy, such items should be less preferable to recyclable items, so this prioritization is confusing. In addition, the MRC feels that many people have been led to believe that compostables are better for the planet because the inputs are most often plant-based. This is simply not true, especially if these items are not composted upon disposal, which would frequently be the case until both organics collection and composting capacity are greatly increased in the metro. This proposed strategy allows consumers to feel “good” about single-use in a way that is misguided, misleading, and distracting from the ultimate goal of reuse.
- *Product availability.* On a more practical level, there are notable supply chain issues for certified compostables, especially for specialty food service items.
- *Questions about the desirability of compostable food service items at local compost facilities.* Many compostables, especially compostable plastics, add little value to the composting process. While it may be acceptable as a means to an end currently, it is unclear that a significant increase would be desirable or manageable.

The MRC may potentially support a fee on single-use beverage containers only, given that the food code is permissive in allowing customers to bring their own cups. We would suggest, however, that the state spend time in understanding impacts on lower-income and unhoused individuals and to explore alternative mechanisms first.

### **Additional strategy recommendation**

Beyond the strategies already included in the plan, the MRC would support an optional or mandatory strategy for counties to adopt a “by request only” policy for utensils, straws, napkins, and condiment packets. Also called “skip the stuff,” these types of policies have been adopted in several other cities and states. While this is more waste prevention/reduction than reuse, it is a complementary policy and works to shift behavior around single-use products. Ideally, this would be a policy the MPCA would support at a statewide level, however, the metro area alone would have a large impact if such a policy was adopted.

We appreciate the opportunity to comment on the Metro Solid Waste Policy Plan 2022-2042. Thank you for considering our feedback, we look forward to seeing more reuse in Minnesota!

Sincerely,

Minnesota Reusables Coalition  
[www.reusemn.org/mrc](http://www.reusemn.org/mrc)