

To: MPCA, Attention of Mallory Anderson via portal at:
<https://mpca.commentinput.com/?id=m3bVDJdWA>

From: The Carton Council

Re: Comments on Preliminary Needs Assessment

Date: December 22, 2025

The Carton Council of North America is composed of four leading carton manufacturers - Elopak, Novolex, SIG, and Tetra Pak. Formed in 2009, the Carton Council works to deliver long-term collaborative solutions to divert valuable cartons from the landfill and ensure the desired fiber material from recovered cartons is used beneficially in manufacturing new products.

The Carton Council appreciates the opportunity to provide feedback on Minnesota's Preliminary Needs Assessment (PNA).

We suggest the project team consider making the following changes/corrections to the tables indicated:

- As is being suggested by the Advisory Group/MPCA, we suggest that all data sources be indicated in the PNA, as well as appropriate limitations of the data – e.g., when a material type may not be fully accounted for due to the manner in which data are collected, such as cartons which comprise Grade 52 but are also present in substantial quantities in Grade 54.
- Table 6 in the PNA indicates that 10 counties (of 87) reported cartons data as a separate category in SCORE reporting. Note. The table indicates that cartons include “aseptic containers and drink boxes.” This description is inaccurate as drink boxes are aseptic containers. We suggest this be revised to “food and beverage aseptic and gable-top cartons.” Where additional clarity is needed, we suggest “fiber-based food and beverage aseptic and gable-top cartons.”
- Table 10 appears to be derived from information developed by the Minnesota REC, however we find the information as presented to be confusing. We suggest it be revised. In this table, the first column indicates what is accepted, the second what is not accepted, and the third what “may be accepted” (to account for variability among different programs in the state. This first column, for food and beverage

cartons, appears to conflate food and beverage cartons with egg cartons. We suggest the phrase “Clear plastic egg cartons” in the first column under the cartons section be deleted as this appears to be an error. We suggest this be replaced with “Fiber-based food and beverage aseptic and gable-top cartons.” This clarifies that plastic packaging, such as plastic egg cartons, is not included in the category. Additionally, we suggest excluding the second column altogether. It is supposed to indicate what is NOT accepted in the category. Such explanations can add confusion because they can’t possibly list all excluded items, and what might be erroneously included in that category is highly subjective. We suggest changing the third column to “Examples of material type.” In the cartons section, we also suggest deleting the information in the third column pertaining to paper egg cartons, as it is not relevant to fiber-based food and beverage cartons, and again conflates different material types. Further, the third column is not where materials not included are described. The image below indicates what we suggest deleting.

Cartons (aseptic and gable-top cartons)		
Clear plastic egg cartons	- Ice cream cartons - Plastic coated paper takeout cartons - Foam egg cartons - Foil drink pouches	Accepted for recycling at the majority of MRFs, but one or more MRFs do not accept them: - Milk and juice cartons - Juice boxes - Soup, broth and wine cartons NOT accepted for recycling at the majority of MRFs, but one or more MRFs do accept them: - Paper egg cartons

- Also in Table 10, the “paper” category does not include cartons. We suggest fiber-based food and beverage cartons be added to this category, as they are paper-based packaging like the other items listed under the paper material type, and are often included in mixed paper.
- It is our understanding that SCORE data pertains to material that is collected, sorted, and marketed for recycling, not simply material that is “collected for recycling” as is indicated in several tables throughout the report. This needs to be clearly indicated in the PNA (Examples include Tables 24 and Table 27) and the Needs Assessment. Further, any limitations to SCORE data should be indicated, as appropriate.

- Table 24 shows tons recycled by residential households of 4 units or less by region for 2024. It shows the following tonnages for the regions indicated:
 - TCMA (Twin Cities Metro Area) – 216
 - NE (Northeast) – 0
 - NW (Northwest) – 5
 - NC (North Central) – 8
 - SE (Southeast) – 234
 - SW (Southwest) – 10

We suggest that if the data for the NE region is greater than zero, this zero be changed to < 1 ton to reflect that cartons are being recycled in the region.

- Table 27 shows the average pounds per household of 4 units or less of cartons collected for recycling in 2024 by region. For cartons, it indicates zero in several regions.
 - TCMA – 0
 - NE – 0
 - NW – 0
 - NC – 0
 - SE – 2
 - SW – 0

We suggest that these numbers be changed to indicate the portion of pounds per household (e.g., 0.25), or indicate <1 pound per household where appropriate so that it does not appear that cartons are not collected for recycling (per Table 24, some quantity of cartons is collected for recycling in all regions except potentially one). As presented, the data are misleading.

- Further, the recycling data pertaining to cartons appears to only include cartons sorted into Grade 52 (cartons only) bales. This needs to be indicated in the PNA, and we suggest that in the Needs Assessment the total number of cartons recycled be estimated to include cartons marketed in Grade 54 (mixed paper) by the residential sector. The Carton Council's recycling estimates suggest that the majority of cartons being recycled in Minnesota are in Grade 54 bales.

Additionally, we find the market information to be extremely broad and would like to add the following pertinent information regarding end markets for cartons, which can be

included in mixed paper (Grade 54) or sold in carton-specific bales (Grade 52). North American markets known to accept cartons in Grade 54 (mixed paper) include:

- North Pacific Paper Company (NORPAC) - Longview, Washington
- Hamilton Manufacturing – Twin Falls, Idaho
- Sonoco
 - City of Industry, California
 - Holyoke, Massachusetts
 - Brantford, Ontario, Canada
 - Hartsville, South Carolina
 - Chattanooga, Tennessee
 - Newport, Tennessee
 - Richmond, Virginia
 - Menasha, Wisconsin
 - Wisconsin Rapids, Wisconsin

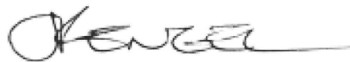
North American Markets known to accept cartons as Grade 52 include:

- Essity, Barton, Alabama
- Sustana Fiber, Breakeyville, Quebec, Canada
- Sustana Fiber, De Pere, Wisconsin
- Upfactory Materials, Des Moines, Iowa
- Upfactory Materials, Lodi, California (soon to open)
- Kimberly-Clark de México, Ecatepec de Morelos, Mexico, Mexico

Further, Carton Council would like to express interest in being interviewed by Eunomia for the Needs Assessment. We ask that the project team contact me at jordan.fengel@cartoncouncil.org to schedule an interview.

Again, we appreciate your consideration.

Sincerely,



Jordan Fengel,
Executive Director, Carton Council