



December 22, 2025

Minnesota Pollution Control Agency
c/o Mallory Anderson
520 Lafayette Road N
St. Paul, MN 55155-4194

Dear MPCA,

The Biodegradable Products Institute (BPI) is North America's leading authority on compostable products and packaging, certifying over 50,000 products from collection bags to food containers. For more than two decades, BPI has given consumers confidence in compostability claims with the backing of science-based standards, while enabling authentically sustainable choices for brands and packagers. BPI champions a systems-wide transition to the circular bioeconomy through rigorous testing, policy advocacy, and industry collaboration, building the infrastructure for "A World Without Organic Waste"—where food scraps and certified compostable packaging become resources. BPI is a non-profit 501(c)(6). To learn more, visit www.bpiworld.org and follow us on LinkedIn.

BPI appreciates the opportunity to comment on the *DRAFT Preliminary Assessment for the Packaging Waste and Cost Reduction Act*. BPI is pleased that the preliminary assessment is well underway; however, we also have concerns with some gaps in detail at this point.

On the glossary of definitions. While we are pleased that the report includes definitions of terms such as “organics recycling,” “source separated organics,” and several of the composting methods, we seek clarity on the use of the term “organics recycling,” which is not defined in statute, instead of “composting,” which is. BPI encourages aligning definitions with those in statute and adding the following definitions as well to help ensure alignment with terms used and understood across the program: “composting,” “compostable material,” “compostable paper and packaging,” “food packaging,” “exempt material,” and “paper product.”

On the covered materials categories. We appreciate that the covered materials and covered material types include compostable paper and plastic, however we recommend that that this category be broken out into more detail – to better understand statewide sales, collection, and processing – and include:

- Compostable paper/fiber
- Compostable rigid plastic
- Compostable film plastic
- Compostable lined paper/fiber

We also recommend separating the “compostable” category in Table 22 and Table 23 to reflect the covered material categories suggested above.



On labeling regulations: Clear labeling on ASTM-certified compostable products, such as those that are BPI certified, is necessary to combat contamination in composting streams. BPI appreciates that the Draft Preliminary Assessment mentions the BPI logo but encourages MPCA to require ASTM-certified composting labels generally, which will ensure inclusivity of other certifying organizations.

On gaps in the data. To support improved data collection and assessment of composting programs, BPI encourages future assessments to include information required to be reported by statute. Some examples of information gaps include:

- SCORE data (or equivalent) for compostable paper and plastic
- Tonnage of compostable materials collected across the state
- Data on compostable programs in the other covered entities mentioned in the report
- Table 19: Composition of Tons Processed by Region does not include compostables
- In addition to the breakdown of compost facilities in the state, please clarify if the acceptable compostable materials in Table 15 is an accurate representation of what is being accepted at all 9 facilities including maximum capacity, average operating capacity, and if they don't accept specific compostables, what are those and why. Language on page 49 "...and are selective about inputs to combat contamination issues" suggests that some allowable compostable (BPI labeled) products may be removed from the organic waste stream due to selective input requirements. We recommend the assessment further detail and review what is being removed and why.
- Data on average contract length and cost for composting programs
- Available and potential end markets for composting programs
- Information on educational resources about existing organics recycling programs available to covered entities

BPI would be happy to connect and discuss these topics in more detail. Please reach out with any questions or to schedule a meeting.

Sincerely,
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