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Public Comment on Minnesota's Draft Preliminary Needs Assessment for the Packaging Waste and Cost Reduction Act

World Centric is grateful for the opportunity to provide feedback on the DRAFT Preliminary Assessment for the Packaging Waste and Cost Reduction Act (Draft Assessment). As a leading manufacturer of compostable products, we are deeply committed to advancing sustainable waste management practices and share the Minnesota Composting Council's (MNCC) vision for a robust and inclusive composting system in Minnesota. Our comments build on MNCC's thoughtful insights, while offering additional perspectives specific to our expertise as a compostable products brand. By addressing the gaps identified in the draft report and fostering a comprehensive and inclusive approach, this Act has the potential to drive meaningful waste reduction, strengthen composting infrastructure, and promote a thriving circular economy across the state.

Inclusion of Compostable Products as a Covered Material

World Centric strongly supports the inclusion of compostable products as covered materials under the Packaging Waste and Cost Reduction Act. The MNCC highlights the rapid growth of the compostable packaging industry, projected to increase by 16% annually through 2032. This underscores the importance of ensuring compostable food service packaging and paper products are explicitly included within the scope of covered materials. We provide the following specific recommendations regarding covered materials:

On page 17 of the Draft Assessment, Table 5, we recommend including "Fiber" alongside "Compostable Paper" under the Compostable Material Type to better reflect the material category.

On page 20, the Draft Assessment notes that "Food and compostable paper and packaging accounted for 27% of the total MMSW stream, with compostable paper and packaging making up 7% of total MMSW". To avoid double counting and ensure accurate program costs, we recommend reflecting the precise percentage of materials in the stream (7%) when calculating reimbursements to service providers and costs to program participants. Producers should only be charged for the 7% total of MMSW, not the full 27% that includes all materials diverted for compost processing.

On pages 52 and 53, Table 22 and 23 list "Compostable" as a single category. We recommend breaking this down into the subcategories of food scraps, packaging, and leaf and yard debris to provide greater clarity and support accurate program costs and implementation.

Need for Clear Definitions

World Centric agrees with the MNCC's call for clear and consistent definitions in the Assessment, particularly for the terms "recycling", "compostable materials", and "organics recycling". These definitions should align with Minnesota state statutes and, where possible, with peer states that have passed Extended Producer Responsibility (EPR) legislation for packaging. Consistency across jurisdictions will help streamline compliance and foster broader adoption of sustainable practices.

Infrastructure and Processing Capacity

The Draft Assessment highlights significant gaps in composting infrastructure and processing capacity which must be addressed to support the effective management of compostable materials. We provide the following specific recommendations:

Tables 22, 25, 26, and 27 do not include baseline data on the amount of organic materials collected. Establishing this baseline is critical for predicting necessary infrastructure expansion and ensuring adequate processing capacity.

We also advocate for investments in Source-Separated Organics (SSO) composting facilities and adherence to Best Management Practices (BMPs) to ensure compostable products are effectively processed. Compensation for service providers must be commensurate with the volume of compostable materials they manage. The recent report by Closed Loop Partners, *Designing an EPR Framework to Include Compostable Packaging Recovery*, provides a tangible framework for achieving this goal.

End Markets for Finished Compost

The Draft Assessment lacks discussion on end markets for finished compost, which are critical for the success of composting programs. While end markets for recycling are well addressed, similar attention should be given to compost. Identifying and supporting end markets for finished compost will ensure the long-term viability of composting systems and create economic opportunities for Minnesota.

By addressing these recommendations, the Packaging Waste and Cost Reduction Act can serve as a model for sustainable waste management and the integration of compostable products into a circular economy. World Centric is grateful for the opportunity to contribute to this important discussion and looks forward to supporting Minnesota's efforts to advance sustainability.