

Eureka Recycling Comments on St. Paul Sustainable To-Go Nov. 21, 2016

Eureka Recycling strongly supports the city's efforts to protect the environment with this initiative by ensuring disposable items distributed to customers (consumed on site or to-go) are reduced, reused, recycled or composted.

Eureka's Products Co-Operative Purchasing: The co-operative purchasing program (open to individual consumers, organizations and businesses) has been operating since 1998. We coordinate the cooperative purchasing of high quality, 100% ASTM 6400 or 6868 certified compostable products (as well as 100% post-consumer recycled printing paper.) This allows consumers to gain access to products that are vetted for quality and environmental benefit at a lower cost because of the bulk purchasing. The only overhead we take on this program is the cost of operating it, while we do enjoy the bulk discount for our own recycled printing papers and compostable product needs. We are happy to work with the city to offer products that will support their packaging ordinance goals.

- Compostable products help consumers get food waste to composting and (when bio-based) reduce our need for fossil fuel based production, furthering the upstream and downstream environmental benefits. All compostable products need to meet ASTM standards (ASTM 6868 or 6400), not use language like "biodegradable" or "compostable" which can be misleading for consumers and the use of these terms is not regulated.
- We suggest that the ordinance include compostable utensils, as there are now several viable options in the marketplace for compostable options and the commonly polystyrene versions are not recyclable.

Poly coated ASTM certified compostable cups, plates etc. are being widely used at events and in other venues in our community– the inclusion of a poly coated cups that cannot be composted but are supposed to be included in recycling creates confusion for the consumer. The amount of education to try to clear up this confusion would be costly and be a brand-by-brand proposition. The result of the cross contamination would negate environmental goals that the city is trying to achieve and could result in plastic in the compost or a degradation of the recycled paper.

- The technical and economic viability of recycling polycoated papers has not been conclusively determined.
 - Our paper markets have historically stipulated restrictions on the inclusion of coated papers in the recycling program based on the impact it has on the quality of the recycled paper. Mechanisms used to filter out these energy used to collect and transport those items.
 - Recycling programs now more than ever cannot rely on a single market for any commodity including paper. Eureka Recycling requires at least two economically viable and stable markets for the material. This includes issues such as length of stable market, economic and environmental impacts of downgrading paper grades to accept the item, along with others.

Also important to note in the Ordinance, Black plastic, Poly Styrene and PLA should not be accepted as an alternative since they do not have any long term, economically viable markets. These items end up as a residual at the MRF or in bales at end markets, adding transportation, collection and processing costs to the City, which are not sustainable, while sustainable alternatives are available.

Education Opportunities: We will strongly support all education efforts to increase the success of the Ordinance's goals. Packaging fairs and outreach events are critical prior to roll out to assist retailers, restaurants and others. Our experience at Zero Waste Events and in commercial composting may be useful to the city to support training to help businesses understand how key decisions can lower disposal costs helping to offsetting cost of sustainable products and/or composting services, while meeting their unique business needs.

Encourage Reuse and Reduction: The current ordinance specifically encourages reuse we strongly support and encourage additional opportunities to prioritize reuse and reduction by finding creative ways to help businesses by financially supporting investments such as dishwashers, reusable plates, etc.