

Minnesota Carpet Stewardship

There are currently an estimated 130,000 tons of carpet being disposed of annually in Minnesota with about 100,00 tons being sent directly to landfills. MPCA estimated only 6,000 tons, less than 4%, of carpet, is being recycled. While the number of tons of carpet that is being disposed is increasing, the state has very limited capacity for recycling this material. Minnesota has no carpet stewardship program that promotes carpet recycling despite multiple counties and local communities seeking alternatives carpet ending up in landfills.

The one in state business that had been recycling carpet ended its program in spring of 2020 as a result of limited state and industry support.

RISE Composite Technologies located in Mankato, is a large consumer of recycled carpet fiber including PET fiber, receiving it recycled fiber from out of state recyclers. Rise is ready to invest in establishing a Minnesota based carpet recycling facility. **With over invested \$40M in their building products manufacturing facility operating in Mankato, Rise is prepared vertically integrate its raw material needs by investing in a Minnesota recycled fiber plant and significantly expanding its state presence. This facility would process ALL carpet fiber types and use the majority of them in manufacturing their finished products in Mankato.** The goal is to increase Minnesota's carpet recycling capacity to 60,000 - 70,000 tons, while investing in the state & local economy and reducing the amount of carpet waste being directed to increasingly expensive landfills.

By processing only 50% of discarded carpet to recycle, this would support an estimated:

- 95 direct jobs and up to 250 indirect jobs associated with new product manufacturing.
- Recovered material will be transformed into new Minnesota manufactured building products, eliminating operational problems and expense in state and local waste processing and incineration caused by carpet disposal, while also preserving landfill space.
- Environmental impacts include reduction of waste in MN landfills preventing 1.2 and 2.6 tons of CO₂ releases relative to disposal and production methods.
- Carpets can contain PFAs and increasing their recycling rate can also reduce the impact of PFAs in local water sources.

This proposal would create a Minnesota stewardship program similar to those in other states currently operating or in legislative consideration, with the required participation of all stakeholders including producers, retailers, recyclers, waste disposal industry, manufacturers, recyclers, local recycling officials and installers. The program establishes a minimum goal for recycling carpet and stewardship rates paid by manufacturers that can range from 4-6 cents per square foot for manufacturers. These funds will be redistributed to entities involved in the recycling process and those using carpet by products.

February 24, 2021

Representative Rick Hansen
Chair, House Environment and Natural Resources Finance and Policy Committee
407 State Office Building
St. Paul, MN 55155

Re: Support for H.F. 1426

Dear Chair Hansen,

The Partnership on Waste and Energy (Partnership) is a Joint Powers Board consisting of Hennepin, Ramsey and Washington counties formed to address waste management and energy issues. We support initiatives that build a sustainable, circular economy to keep products and materials in use. We support producer-led product stewardship efforts to reduce lifecycle impacts of products and manage materials more sustainably.

The Partnership would like to thank Representative Jordan for introducing H.F. 1426 and Chair Hansen for hearing it. We strongly support the concept of product stewardship, and we certainly support product stewardship for carpet. H.F. 842, also authored by Representative Jordan and modeled after legislation introduced in the previous Session, is a product stewardship approach we favor. Nonetheless, H.F. 1426 represents an important step in creating a product stewardship system that supports carpet recycling. After the recent loss of what little carpet recycling infrastructure there was in the state, this bill marks Minnesota's return to the conversation of keeping this resource out of landfills.

By creating a partnership among producers, retailers, recyclers, local government and other stakeholders, this bill begins to form a carpet collection network that will do the following.

- Provide feedstock to manufacture new products out of carpet that would otherwise be landfilled.
- Reduce operational challenges in waste processing facilities.
- Reduce greenhouse gas emissions through recycling.
- Support jobs and economic growth.

We support the goal of H.F. 1426 to value carpet as a resource for recycling and prefer the following concepts to be included in the bill to create a more robust carpet stewardship effort in Minnesota.

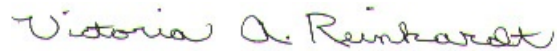
- Promote design and production of carpet in ways that minimize environmental and health impacts.
- Remove end-of-life fees that may lead to disposal or illegal dumping.

RE: Support for H.F. 1426

- Establish a statewide network of carpet recycling collection points that are convenient to residents and small businesses.
- Design a system that more strongly discourages mixing waste carpet with construction, demolition or mixed solid waste.
- Fully reimburse local governments that participate as a program collection site or otherwise assist in the success of the program.

The Partnership supports the work of the bill author to introduce H.F. 1426 to establish a product stewardship approach to managing waste carpet. We look forward to working together to achieve passage of a bill that reduces the life cycle impacts of carpet and the burdens faced by local government and Minnesota residents in dealing with waste carpet.

Sincerely,



Commissioner Victoria Reinhardt, Ramsey County
Chair, Partnership on Waste and Energy

C. Peter Strohmeier, Committee Administrator
Commissioner Debbie Goettel, Hennepin County
Commissioner Fran Miron, Washington County



February 24, 2021

Scott Cassel
Chief Executive Officer/Founder

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Representative Ami Wazlawik, Vice-Chair
House Committee on Environment and Natural Resources Finance and Policy
Minnesota House of Representatives
100 Rev. Dr. Martin Luther King Jr. Blvd.
Saint Paul, MN 55155

RE: Support for HF 1426, Carpet stewardship program

Dear Chair Hansen, Vice-Chair Wazlawik, and Members of the Committee:

Thank you for the opportunity to submit testimony in **support** of HF 1426, which would establish a sustainably financed, statewide carpet stewardship program in Minnesota to recycle carpet. The Minnesota legislature and the Minnesota Pollution Control Agency already have significant experience passing and implementing stewardship programs for leftover paint, used batteries, electronics, and mercury thermostats.

Carpet is a bulky, cumbersome product that contains valuable materials that can be made into new products (including carpet pad, packaging, and building products) and whose recycling will reduce environmental impacts. For example, recycling rather than landfilling one ton of used carpet into new carpet or other products reduces greenhouse gas (GHG) emissions by 5,200 pounds of carbon dioxide equivalent. HF 1426 is anticipated to increase the Minnesota carpet recycling rate from 1.8 percent to at least 15 percent by 2024 (and higher in the future), reducing the amount of carpet disposed of in Minnesota landfills by over 11,000 tons per year. This would reduce GHG emissions equivalent to taking 5,000 cars off the road.

HF 1426 will not only reduce GHG emissions, it will also increase the quantity of carpet recycled and diverted from disposal facilities and significantly reduce the financial burden on local governments. California's carpet stewardship law, passed in 2010, has achieved a carpet recycling rate of nearly 20 percent, more than three times the national average.

Moreover, stewardship programs such as the one required by HF 1426 would provide a continuous flow of high-quality material to recycling and manufacturing operations, allowing long-term investments in local recycling and manufacturing facilities. The California carpet stewardship law has created 440 direct and indirect jobs and resulted in discarded carpet being recycled and used as a feedstock for new product manufacturing.

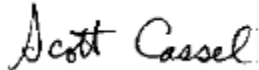
HF 1426 will create a stewardship program for carpet throughout Minnesota. The bill contains many of the standard elements of successful stewardship programs, including a stewardship plan, education and outreach, performance goals, and annual reporting, all with oversight by the Minnesota Pollution Control Agency.

The Product Stewardship Institute (PSI) is a national nonprofit that reduces the health and environmental impacts of more than 25 consumer products from design and production through end-of-life. With members from 47 state environmental agencies and hundreds of local governments, as well as 120 partners from companies, organizations, universities, and international governments, we promote product stewardship initiatives across North America. Over the past 20 years, PSI and its members have played a significant role in passing most of the 119 U.S. extended producer responsibility (EPR) laws on 14 products in 33 states, including four EPR laws in Minnesota for paint, batteries, electronics, and mercury thermostats.

Thank you for your consideration and leadership on this important issue.

If you have any questions, please feel free to contact me at (617) 236-4822, or Scott@ProductStewardship.US.

Sincerely,

A handwritten signature in black ink that reads "Scott Cassel". The signature is written in a cursive, slightly slanted style.

Scott Cassel
Chief Executive Officer/Founder

Honorable Environment & Natural Resources Finance and Policy Committee Members
100 Rev. Dr. Martin Luther King Jr. Blvd.
Saint Paul, MN 55155

February 24, 2021

RE: Concerns with HF1426 – the “Carpet Stewardship Program”

Honorable Committee Members,

We write to express significant concern with House File 1426. A few specific concerns are as follows:

1. Lines 3.9-3.24: Increased Construction Costs.

- a. This provision will increase the cost of carpet by four or six cents per square foot. This increase will lead to higher construction costs in Minnesota for businesses and homeowners alike.

2. Line 1.13: Fees can be increased with no oversight.

- a. The commissioner has sole discretion to increase program fees, adjustments are exempt from rulemaking requirements, and there is no recourse for those being charged.
- b. It is concerning that this provision has been included & begs the question – does the state already anticipate increasing fees before the bill is passed, and how much will the Carpet Stewardship Program actually cost residents and businesses?

3. Limited Stakeholder Engagement & Sweeping Reforms.

- a. To our knowledge, no floor-covering installation firms were engaged in drafting the bill.
- b. HF1426 raises many practical questions related to transportation and the recyclability of most old carpet.
- c. HF1426 ushers in sweeping reforms and unknown costs during uncertain times.

As major stakeholders in the flooring industry, we ask that you oppose the passage of HF1426 at this hearing. Respectfully,

Minnesota Floorcovering Contractors Association
1270 Northland Dr., Ste.150
Mendota Heights, MN 55120

Housing First Minnesota
2960 Centre Pointe Dr,
Roseville, MN 55113