



April 21, 2025

Senator Aric Putnam  
Agriculture, Veterans, Broadband, and Rural Development Committee  
Minnesota Senate  
Room 1150  
Minnesota Senate Building  
Saint Paul, MN 55155

**RE: Letter of Information Regarding SF 188 – Requiring food manufacturers and brand owners to report ortho-phthalate testing results of packaged food products to the Commissioner of Agriculture.**

Dear Committee Chair Putnam, Vice Chair Kupec, Ranking Minority Member Westrom and Members of the Agriculture, Veterans, Broadband, and Rural Development Committee,

The American Forest & Paper Association (AF&PA) respectfully submits this letter of information regarding SF 188, on behalf of our members and their employees who are an integral part of the circular economy.

**Introduction to AF&PA**

The American Forest & Paper Association (AF&PA) serves to advance public policies that foster economic growth, job creation and global competitiveness for a vital sector that makes the essential paper and packaging products Americans use every day. The U.S. forest products industry employs more than 925,000 people, largely in rural America, and is among the top 10 manufacturing sector employers in 44 states. Our industry accounts for approximately 4.7% of the total U.S. manufacturing GDP, manufacturing more than \$435 billion in products annually. AF&PA member companies are significant producers and users of renewable biomass energy and are committed to making sustainable products for a sustainable future through the industry's decades-long initiative — [\*Better Practices, Better Planet 2030\*](#).

**In Minnesota, the industry employs more than 24,700 individuals, with an annual payroll of over \$2.1 billion. The estimated state and local taxes paid by the forest products industry total \$205 million annually.<sup>1</sup>**

**Information on Ortho-phthalates and Food Packaging**

The provisions in this bill regarding ortho-phthalates in food packaging impose unnecessary and burdensome requirements. Ortho-phthalates are not new chemicals; they have been known and studied for decades. IN 2022, the U.S. Food and Drug Administration (FDA) issued a final rule on these chemistries acknowledging the food packaging industry, "has abandoned the food contact

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<sup>1</sup> Data sources: IMPLAN, 2023 Data, using inputs provided by AF&PA, In 2023 Dollars.

use of most phthalates that were previously authorized for food contact uses.”<sup>2</sup> This rule has withstood scrutiny and has been reaffirmed as recently as October 29, 2024.<sup>3</sup> Given this established history, imposing additional regulatory requirements on packaging is redundant, does not ensure regulatory consistency, and does not provide added public health benefits.

We hope this information provides critical context as the Committee considers this necessity of SF 188. For any questions or further information, please contact Frazier Willman, AF&PA’s Manager of Government Affairs, at [Frazier Willman@afandpa.org](mailto:Frazier_Willman@afandpa.org).

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<sup>2</sup> <https://www.federalregister.gov/documents/2022/05/20/2022-10531/indirect-food-additives-adhesives-and-components-of-coatings-paper-and-paperboard-components>

<sup>3</sup> <https://www.fda.gov/food/hfp-constituent-updates/fda-update-phthalates-food-packaging-and-food-contact-applications#:~:text=The%20FDA%20issued%20the%20final,authorized%20for%20food%20contact%20uses>