

Packaging Extended Producer Responsibility Advisory Board

Wednesday, October 29, 2025

Start 1 p.m. – 4 p.m.

[MS Teams](#) | Phone conference ID: 115 305 716# | Call in (audio only) +1 651-395-7448

Meeting Location: Room 100, MPCA St Paul Offices, 520 Lafayette Rd N., St. Paul, MN 55155

If attending in person, RSVP to packaging.mPCA@state.mn.us by noon on Monday, October 27, 2025

Attendees:

Time	Topic	Speaker	Type	Page
1 p.m.	Call to order - Meeting logistics - Welcome and roll call / attendance - Meeting outcomes Approve agenda Approve September meeting summary	Chair Reinhardt	Action	2
1:05 p.m.	Updates from MPCA Updates from CAA	Mallory Anderson, MPCA Bridget Anderson, CAA	Information	
1:20 p.m.	Procedure updates - Open meeting law - Examples of comment letters - Overview of plan for ad hoc committee	Mallory Anderson, MPCA	Information	8
1:30 p.m.	Covered material categories list - Updates on status of list - Discussion	Mallory Anderson, MPCA	Information	9
2:00 p.m.	Update on Preliminary Assessment	Mallory Anderson, MPCA	Information	
2:30 p.m.	Break [15 minutes]			
2:45 p.m.	Design for Reuse, Refill, Recycling, and Compost	Taylor Lobner, General Mills Association of Plastic Recyclers	Information	
3:45 p.m.	Public comment			
4 p.m.	Adjourn			

Packaging EPR Advisory Board

Meeting Notes

Virtual via Microsoft Teams or in-person at the MPCA St. Paul Office | 3 hours

Thursday, September 25, 2025 | 9 am – 12 pm CT

Recording available at: <https://www.pca.state.mn.us/events-and-meetings/packaging-extended-producer-responsibility-advisory-board-meeting-2025-09-25>

Attendance

Board Member Attendance

Present (9 members required for quorum)			Absent
Gabbie Batzko-Conley	Miriam Holsinger (Vice Chair)	Maggie Schuppert	Sydney Harris
Sara Bixby	Bill Keegan	Mac Sellars	Townsend Brown
Kris Coperine	Kirk Koudelka	Jon Steiner	
Megan Daum	Gregory Melkonian	Steve Vrchota	
Kate Davenport	Shoshana Micon		
Mike Griffin	Victoria Reinhardt (Chair)		
Steve joined at 9:50 am			

Guest Presenters: Bridget Anderson, CAA; Molly Hickman, Eunomia; Sarah Edwards, Eunomia; Susan Heffron, MPCA

Agency Staff: Molly Flynn, John Gilkeson, Quinn Carr, Tina Patton, Annika Bergen

Participants: Alex Torres; Alexander Truelove, BPI; Ally Peck, CTA; Amanda Erickson, HDR; Amber Backhaus; Amos Briggs; Andrea Albersheim, American Chemistry; Andrew Morley, MN Chamber; Angie Lemar, FOTH; Annebelle Klein; Brandon Nemec, Reyes Coca-Cola Bottling; Brian Olson, Beltrami County; Bridgette Coultas, Harley-Davidson; Brittany Ramos Castellon; Carol Patterson, Foodservice Packaging Institute; Christopher Rendall-Jackson; Dan Donkers, Ramsey County; Dan Leif, Recycling Partnership; Darla Arians, PSI; Drew Hatzenbihler, Morrison County; Dustin Strickland, SynergyLabs (a producer from North Carolina); Emily Sisk, HDR; Frazier Willman, AF&PA; Garth Hickie; GT; Hannah-Grace Henson, BD Law; Janell Schroeder; Jennefer Klennert, HDR; Jill Curran; Joan Popowics; John Salvador; Josh Hauf, MPCA; Julie Ketchum, WM Area Director of Gov Affairs; Kelsey P; Leah Batstone-Cunningham, Anderson Corp; Lena Zodda; Lucy Trotter, MPCA; Maggie Yauk, Anoka County; Marina P; Mark Carpenter; Matt Chmielewski; Matt Herman; Matthew Lemke; McKenzie Pearson; Meagan Maxon, Atlas Roofing; Michelle Horan, Good to Go Cups; Natalie Betts, Recycled Materials; Nathan Klett, FOTH; Paul Gardner, RAM; Penny Steinwagner, Morris Packaging; Peter Hargreave, CAA; Sara Beth Watson, Wiley Law; Shannon Pinc, NatureWorks; Shayna Petit, Lorax Compliance; Steven Day, Kubota; Teresa Conner; Tim Wilkin, Minnesota Beverage Association; Todd Hill; Tony Kwilas; Tristan Steichen

Meeting notes

Call to order

Chair Victoria Reinhardt opened the meeting.

Approval of the Agenda

Kris Coperine motioned and Jon Steiner seconded. Annika Bergen conducted a roll call vote.

Aye: Batzko-Conley, Bixby, Coperine, Daum, Davenport, Griffen, Holsinger, Keegan, Melkonian, Micon, Reinhardt, Schuppert, Sellars, Steiner

Nay: None

Absent: Brown, Harris, Vrchota

Approval of August 2025 Meeting Summary

Bill Keegan motioned and Kris Coperine seconded. Annika Bergen conducted a roll call vote.

Aye: Batzko-Conley, Bixby, Coperine, Daum, Davenport, Griffen, Holsinger, Keegan, Melkonian, Micon, Reinhardt, Schuppert, Sellars, Steiner

Nay: None

Absent: Brown, Harris, Vrchota

Agency updates

Presented by Annika Bergen, MPCA staff

Eunomia was announced as the contractor selected for the preliminary assessment (deadline December 31, 2025) and the first needs assessment (deadline December 31, 2026). Quinn Carr has joined the MPCA team as the agency's product stewardship data analyst. In his role, he will be working with Eunomia on the assessments, expending efforts with service provider registration, and generally leading data gathering and analysis related to Minnesota's packaging EPR.

CAA updates

Presented by Bridget Anderson, Circular Action Alliance (CAA)

CAA is continuing its work on producer registrations and has 2400 fully vetted registrations. They are anticipating that once fully vetted, they should have close to 2600 producers registered. CAA will be submitting the PRO registration to the MPCA by next July (producers and brands). CAA will also use the covered material categories list that is developed as a part of their vetting process once it is cleaned up.

Eunomia intro and Preliminary Assessment updates

Presented by Molly Hickman and Sarah Edwards, Eunomia

Eunomia provided an overview of their team that will be working on the Minnesota preliminary assessment (deadline December 31, 2025) and the first needs assessment (deadline December 31, 2026), which will be led by Eunomia with support from local solid waste experts at FOTH and ERG. Eunomia also shared about their previous work with Packaging EPR in Canada and in the US (CA, WA, CO, MD, OR, IL). For immediate next steps, Eunomia will be working with the MPCA, CAA, and the advisory board to begin addressing the required scope for the preliminary assessment and identifying data sources for the final report.

Recognizing the tight timeline for the preliminary assessment, including a public comment period, the Packaging EPR Advisory Board voted to recommend extending the report timeline for a deadline of January 15, 2026 in order to have a 30-day public comment period (instead of 20-day).

Approval to recommend extending the preliminary assessment report timeline

Jon Steiner motioned and Bill Keegan seconded. Annika Bergen conducted a roll call vote.

Aye: Batzko-Conley, Bixby, Coperine, Daum, Davenport, Griffen, Holsinger, Keegan, Melkonian, Micon, Reinhardt, Schuppert, Sellars, Steiner

Nay: None

Absent: Brown, Harris, Vrchota

Ad hoc committee discussion: proposed covered material categories

Presented by Miriam Holsinger, Eureka Recycling (Board vice chair and chair of ad hoc committee)

The ad hoc committee met over the last month to prepare a draft covered material categories list to review with the full Packaging EPR Advisory Board for review and feedback. As a part of the process, the committee reviewed categories developed by other states, the data the MPCA collects for SCORE, and the new list of categories developed for the upcoming Minnesota statewide waste composition study. After discussion with the board, the proposed list will be shared with the MPCA and Eunomia, the contractor completing the preliminary needs assessment, for further review and refinement. CAA will provide feedback as a part of the next phase as well. Feedback from the discussion will be reviewed and accounted for during the next steps.

*** Two comments were emailed by board members outside the meeting and copied at the end of the meeting summary.*

Responsible end markets

Presented by Kirk Koudelka, MPCA Assistant Commissioner

Provided a basic overview and definition of responsible market in the law. As the program is implemented and the full needs assessment progresses next year, more specifics about responsible markets and how they are identified will be confirmed.

Recycling end markets

Presented by Susan Heffron, MPCA staff

Shared about the strong recycling tradition in Minnesota, providing a basic understanding of why recycling end markets are important and the status of recycling end markets for Minnesota and across the US. If there aren't recycling end markets, then the value of recycling doesn't exist. A few of the challenges discussed were companies going back on the recycled content goals, consumers not believing plastics are actually recycled, and cheaper recycled content coming in from outside of the United States to replace local sources.

Public comment

- Maggie Yauk, Anoka County – Suggestion to share the surveys for the preliminary/needs assessment with the Solid Waste Administrators so they can forward it on to their local municipal partners to ensure there is Greater Minnesota representation. Other groups to share it with include RAM, SWANA, and MNCC.
- Mattie Chmielewski, Kawasaki Motors Corporation – For the material category list, in the metal section it didn't include non-food ferrous metal containers. There is packaging that they use that would be covered material fitting that category such as power supports for on-road and off-road and international materials are shipped in steel containers. While it may be exempt for hazardous and flammable materials, there are also things like oil drums and fuel mix containers that are shipped in the ferrous metallic containers.
- Ally Peck, Consumer Technology Association – For the material category list, she didn't see molded fiber and would recommend making it clear if it is its own category or under another category. That is a primary packaging material used for electronic devices and should be recyclable. Also, with regards to sourcing and preferences for domestic sourcing, take into context that the packaging sphere isn't just

packaging for food. All of CTA's products are produced overseas and the packaging is also produced there. Durable products have packaging, it's not just food.

Parking Lot

Comments and questions have been consolidated and paraphrased:

- None

Meeting adjourned at 11:57 pm.

Notes compiled by: Annika Bergen

[Minnesota's Packaging Extended Producer Responsibility Advisory Board](#)

Emailed comments

These comments are included to ensure transparency and compliance with Minnesota Open Meeting law. Going forward comments like this will be sent directly to MPCA staff who will then distribute them or present them as a part of the meeting on behalf of board members. A reminder was sent via email, and this procedure will be addressed again in the October advisory board meeting.

Sydney Harris:

Hi everyone,

Congrats to the Eunomia team and MPCA for finalizing the contract! I unfortunately will have to miss the upcoming board meeting as I'll be on a vacation that was planned before my appointment to the board, so I wanted to provide my comments on the reuse pieces in advance to support your discussion.

First, I appreciate the clear distinction between returnable reusables and refillable reusables, in alignment with the definitions in statute. (And love the inclusion of B2B materials as well!) However, I do want to suggest one small tweak to our collective understanding:

Reminded ourselves for reuse to count it needs to be part of a broader system that does ~~deposit~~ returns or refills. *It is not necessary, nor outlined in the statutory definition, that a reuse system must use deposits. Of course deposits are helpful to boost return rates, but there are business models on the market today that don't use upfront deposits. We'll need to allow for these as well, because if we consider a future where reusable packaging has proliferated, it won't remain accessible if there are deposits on everything. High return rates can be and are achieved in systems without deposits as well- [check out this summary](#) for examples!

Second, I'd suggest tweaking the examples for max clarity, as outlined below. I hope these are helpful clarifications and happy to discuss further in October when I'm back at my desk!

Reuse Materials
Returnable
Product Type
Material/End of Life Type
Examples

Beer Growlers in glass bottles --> Drinking cups made of PET (e.g., at a stadium) Reasoning: Beer growlers are typically owned by the consumer and refilled onsite, where they are handed directly back to the consumer. In other words, they don't really require return to the producer or change hands between consumers. I would categorize them as refillables, not returnables. Reusable cups at stadiums are a stronger example because they are professionally cleaned by a third party between uses (i.e., between baseball games) and a new consumer will use them each time.
Milk Bottles in glass
Contained and/or limited time event with PP beverage cups (I believe this is the same as the PET example I added above but in case not, leaving it here)
Returnable mailing envelope in canvas, e.g. https://www.returnity.co/ Reasoning: If you want a third example, I think reusable mailers are a great one! They are directly returned by consumers to a reverse logistics system (the mail) and prepared by the reuse system for the next product. They are also a strong example of a non-food-contact package, which I think is useful for expanding the general imagination around reuse.
Refillable
Product Type
Material/End of Life Type
Examples
Bulk areas of stores that allow customers to bring their own containers This is not quite a system for reuse - it is completely dependent on consumers and doesn't incentivize them to do anything. A better example would be bulk aisles that provide reusable packaging for consumers to refill their products, such as the Dr. Bronner's refill stations at Whole Foods, where customers refill their specific Dr. Bronner's container at the machine in-store. IN this case, Dr. Bronners is the producer and the refillable container they've put onto the market is the soap container. The system for refills is the in-store refill machine - even better if they provide a discount for refilling.
Stores that refill containers for customers This is also not a system for reuse - covered materials have to be put on the market by producers. Most refill shops will allow consumers to bring in any container they want from home, like a Mason jar, which doesn't count here. A better example would be a soap dispenser (let's say HDPE) intended for long-term use and refill with concentrates. In this example the producer (such as Blueland, or Clorox) has created a system wherein the soap dispenser is explicitly designed and marketed for refill-at-home, and refills are sold as concentrates via a subscription model making it convenient and easy for consumers to keep refilling the dispenser and easier than a bulk aisle for the PRO to estimate refill rates by tracking sales of the refills. Note that any single-use packaging associated with the concentrate refills does NOT count (it being single-use) - only the actual refillable dispenser.
Beer growler in glass (moving this example down here because it is owned by the consumer and refilled in one go at a brewery) - still not really a "system" for refills unless there is an incentive by the brewery to refill, such as a discount, but a widely recognizable example nonetheless.
B to B returnable via distribution network
Wax Cardboard (i.e. produce boxes + CSA Boxes)
Wooden Pallets
Plastic Pallets
Milk Crates

Mac Sellars:

Hi all,

I would echo Sydney's comments above.

For some context: from 2017 - 2020, r.World deployed reusable cups at concerts in stadiums / arenas in many areas of the U.S., and used a deposit model at the time. While common and successful in Europe, we found that American audiences across geographies tended to view deposits (at least in a concert environment) as evidence that they had "purchased" the item, and thus actually lowered return rates. After the pandemic, we decided to explicitly move away from deposits and instead rely on other methods for incentivization (gamification, rewards, loss fees, etc), and we find that most reuse service providers in the U.S. are likewise not using deposits.

Examples of letters to state agencies or departments on EPR for Packaging

Colorado Advisory Board Examples:

- recommendation for approval (LPMA):
<https://oitco.hylandcloud.com/cdpthermpop/docpop/docpop.aspx?docid=42124282>
- recommendation for approval (CAA)
<https://oitco.hylandcloud.com/cdpthermpop/docpop/docpop.aspx?docid=4932611>

California Advisory Board Example: [Barriers and Solutions Report](#) which was an input for the multiple needs assessments required.

Oregon Advisory Board Example: <https://www.oregon.gov/deq/recycling/Documents/ORSACfeedback.pdf>.

Comments on covered materials category list

Comment from Sara Bixby

Sara Bixby, National Waste & Recycling Association (NWRA) – Board member representing waste hauler or a statewide association for waste hauler(s)

Good afternoon. I've been struggling with one of the things we included on the Covered Materials list since the final subcommittee meeting on that topic and finally found a way to put into words what my concern is regarding shredded paper as a covered material for EPR.

The purpose of the EPR program is to make the producer responsible – either for funding material recovery or to change their design decisions.

Newspaper, which is excluded from the EPR program, can be shredded. Magazines, also excluded from the EPR program, can be shredded. Neither should be a covered material, but there's no way to reasonably differentiate the shreds of newspaper or magazines from other shredded papers that when whole are included in the EPR program if they all arrive for processing mixed in a bag.

Unshredded paper in many varieties is included in our covered material list.

Shredded paper is a different thing than the whole paper originally sold into the state. It has been changed by the consumer of that paper into a largely unrecognizable/inseparable form. Producers (unless they sold the original shredded paper) would have a legitimate argument for not being held responsible to fund recovery of shredded paper or to make different design decisions for paper. It is the residential or commercial consumers of paper that are shredding the whole paper acquired from the producers, probably to destroy sensitive information printed on it. The producers can't make a different design decision to prevent shredding. Banning the sale of shredded paper won't prevent consumers from shredding whole sheets of paper.

MRFs typically don't want shredded paper. Compost facilities are likely to have reservations about the level of non-compostable materials in the shredded paper.

So, I'm not convinced at this point that shredded paper should be a covered material. Can we please revisit this at the next meeting? Per Annika's request, I'm mostly limiting distribution to MPCA, but also didn't want to blindsides Miriam as the chair of the subcommittee.

Thank you.

Sara