MINNESOTA POLLUTION CONTROL AGENCY

Packaging Extended Producer Responsibility Advisory Board

Wednesday, December 3, 2025

Start 1 p.m. - End 4 p.m. CDT

MS Teams | Phone conference ID: 829 573 489# | 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 Friday, November 28.

Agenda:

Time	Topic	Speaker	Type	Page
1 p.m.	Call to order Meeting logistics Welcome and roll call / attendance Meeting outcomes Approve agenda Approve November meeting summary	Chair Reinhardt	Action	
1:10 p.m.	Updates from MPCA Updates from CAA	MPCA CAA	Information	
1:20 p.m.	Outreach and Engagement Plan for the Needs Assessment	Eunomia & Foth	Information	2
1:50 p.m.	Board discussion: draft Preliminary Assessment	Vice Chair Holsinger	Discussion	
2:30 p.m.	Break [15 minutes]			
2:45 p.m.	Board discussion: draft Preliminary Assessment	Vice Chair Holsinger	Discussion	
3:45 p.m.	Public comment	Chair Reinhardt		
4 p.m.	Adjourn			

Preliminary Assessment EPR Advisory Board Comments DRAFT

The Packaging Extended Producer Responsibility Advisory Board is deeply concerned by the quality, accuracy, and completeness of the Preliminary Needs Assessment. While we recognize the limited timeframe for completing this assessment, the current draft contains substantial inaccuracies and unclear methodology which could mislead Minnesotans and other stakeholders working towards implementing EPR.

Staff preparing the report need adequate time to develop appropriate questions, conduct interviews, and complete the necessary research to accurately capture the complexities, true costs, and capacities of the systems currently managing covered materials in Minnesota. To meet the level of quality this report requires, stakeholders participating in interviews and surveys must have confidence that any information they provide will remain confidential. For example, offering a non-disclosure agreement ahead of interviews likely would have resulted in more complete and detailed responses.

Getting the Preliminary Assessment correct is a critical step in the process of implementing the Packaging Waste and Cost Reduction Act. In reviewing this report, we identified data gaps and misinformation in every single one of the eleven requirements set by the state legislature. We strongly recommend that the project timeline is adjusted to provide enough time to fully complete this report with accurate data and well-documented, Minnesota-specific projections in areas where reliable data does not exist.

While the inaccurate data and misinformation were of utmost concern to the Advisory Board, we also recommend the following improvements around the definitions and language of the report as well as more clarity and consistency regarding the data used in charts and maps.

Recommendations regarding language and definitions

- The report should be easy to understand for all stakeholders. All assumptions, language, and terms need to be clearly defined. This includes, but is not limited to:
  - Clarifying the difference between a City and a Municipality
  - Providing distinct definitions for composting processes, which should include Static Windrow, Aerated Windrow, and Aerated Static Pile
  - Distinguishing between a county submitting a Solid Waste Management Plan and annual SCORE data
  - Defining non-residential covered entities, including public buildings and spaces
  - Using consistent terminology when referring to different groups of entities, e.g., all covered entities, residential households only, or non-residential covered entities only, or all entities including covered and non-covered entities.
  - Clarifying whether "prevalence of use" refers to services offered in the area or just the proportion of households actually using those services.
- Sections should be clearly labeled so readers understand whether the subject is recycling, composting, or both. For example, the "Contractual Arrangements" section appears after the composting section but only addresses recycling contracts, which is confusing. It takes a minute for the reader to realize the report is *only* about recycling contracts and *not* composting contracts. There is no comparable information on organics collection contracts, nor any indication of whether that data appears elsewhere.
- The list of Recycling Sorting Technology should make clear the impact of the different technologies on recycling capacity and covered entity access. This context is necessary to identify where capacity improvements may be needed.
  - Each technology listed should come with context. For example, instead of stating "Robotics Employing AI" with "arm intended to pick," replace the word "arm" with "implement or other means used to positively or negatively sort specific material from passing material stream."
- Organized collection services should always clearly state if they are for MSW, recyclables, and/or compostable materials.

- Reduce repetition. For example, if MRF equipment is thoroughly defined in the glossary of terms, reference the glossary rather than repeating the definitions in the MRF Technology section.

Improve clarity, consistency, and usefulness of data in charts and maps

- Maps should include:
  - Higher resolution
  - Clear labeling
  - Zoomed-in metro maps where necessary e.g., composting drop-off locations
  - Placement in relevant sections e.g., composting maps in the composting section or in an appendix
- Recommendations for charts:
  - Include citations for all data sources – for some charts it was unclear if the data was from the SCORE reporting or if it was extrapolated from somewhere else.
- Clearly explain all assumptions, including:
  - Estimates and adjustments made when incorporating non-Minnesota data
  - How limited datasets were scaled up to develop statewide assumptions
  - How data from different regions, such as rural and urban, were combined in order to build validity and understanding in the differences.
- For regional charts documenting city-level infrastructure (i.e., Tables 8 and 9) indicate whether data exclude residents living outside of cities, and if so, document what percentage of the households and non-residential covered entities are not included in the chart.
- In addition to sorting by region, all data should also be sorted and presented by density (i.e., urban and rural) to provide a more complete picture of varying needs and costs.
- Reconcile data inconsistencies across charts and between texts and charts. If the data in the chart conflicts with, or is different than, data in different charts, then that needs to be addressed in a note under each chart or in an appendix for easy reference. For example, Tables 5, 6, 10, 24, 26, and 27 were all very similar but also slightly different. This led to confusion as to why they were different – was there an error or is the difference due to differing data sources?
- Consider putting reference charts created by outside entities that have excess information into an appendix and only cite the relevant information in the report. For example, Table 10 (REC Guidelines) could be a reference rather than fully reproduced with non-covered materials such as mirrors, vases, bakeware, batteries, scrap metal, etc.
- Combine related charts so stakeholders can easily understand the full needs assessment, for example, the following charts should be displayed together:
  - Current collection of covered materials
  - Projected generation of covered materials, and
  - Statewide processing capacity of covered materials
- This gives readers a full picture of where Minnesota is doing well in terms of recovery, has capacity for expected increase in recovery, and needs to improve. This will also help check data. For example, if estimated current collection of covered materials is 90% of estimated generation of covered materials, based on capture rates studies, we know at least one of those data points is incorrect.

Summary Recommendation

We strongly recommend extending the project timeline to ensure that:

- Data and information included in the report is accurate and relevant to Minnesota.
- Definitions and terminology are consistent and clearly described so that all stakeholders can understand the report.
- All maps, charts, and data are cross referenced, well labeled, easy to read, and accompanied by clear documentation when discrepancies occur between data sources.