July 1, 2026

Mr. Kirk Koudelka
Assistant Commissioner | Land Policy
Minnesota Pollution Control Agency
520 Lafayette Road N.
Saint Paul, MN 55155-4194

Sent via email to: **packaging.mpca@state.mn.us**

Dear Commissioner Koudelka,

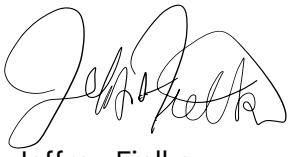
I am writing to you on behalf of Circular Action Alliance (CAA), the U.S. Producer Responsibility Organization (PRO) selected for the first five-year stewardship plan for Minnesota's *Packaging Waste and Cost Reduction Act*. CAA is dedicated to implementing effective Extended Producer Responsibility (EPR) laws for paper and packaging. As a nonprofit, producer-led organization, CAA is committed to helping producers comply with EPR laws, delivering harmonized best-in-class compliance services and working with governments, businesses, and communities to reduce waste and recycle more. CAA was founded in 2022 and has 24 founding members, representing the food, beverage, consumer goods, restaurant and retail industries. We serve as the PRO for paper and packaging in Colorado, Oregon, California, Maryland, Minnesota and Washington.

With this letter, we are pleased to submit CAA Minnesota's PRO registration pursuant to Minnesota's *Packaging Waste and Cost Reduction Act*, Minn Statute 115A.1443 Subd. 1.

As of June 22, 2026, CAA Minnesota has 3,421 producers registered for the state. We continue to recruit and support producers to participate in Minnesota's EPR program.

CAA has been on an incredible journey alongside producers, state partners, the advisory board, service providers, municipalities and communities to establish a strong foundation for EPR success. We value our collaborative relationship with MPCA and are committed to supporting the effective launch and operation of Minnesota's program. Please let us know if you have any questions or if we can provide more information.

Sincerely,



Jeffrey Fielkow
Chief Executive Officer
Circular Action Alliance

CC: Shane Buckingham, Circular Action Alliance, Chief of Staff
Jessica Young, Circular Action Alliance, VP Compliance and Regulatory Affairs
Tiffany Gomez, Circular Action Alliance, Director EPR Compliance
Bridget Anderson, Circular Action Alliance, Director of Emerging States
Kris Coperine, Circular Action Alliance, Minnesota State Program Manager

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Appendix A: Circular Action Alliance Contact Information

115A.1443 Subdivision 1. (a)
(1) contact information for a person responsible for implementing an approved stewardship plan

CAA's Chief Executive Officer is responsible for implementing an approved plan in Minnesota on behalf of CAA Minnesota.

CEO Jeffrey Fielkow
Circular Action Alliance
20 F Street NW, Suite 700
Washington, DC 20001
jeff.fielkow@circularaction.org

For program planning and implementation, please contact:
Kris Coperine, Minnesota State Program Manager Kris.Coperine@circularaction.org

For compliance, please contact
Bridget Anderson, Director of Emerging States Bridget.Anderson@circularaction.org

Appendix B: CAA National Board of Directors

115A.1443 Subdivision 1. (a)
(4) a list of current board members and the executive director if different from the person responsible for implementing an approved stewardship plan

- **Chair: Charlie Schwarze**, Senior Director of Sustainability, Keurig Dr Pepper
- **Vice Chair: Sam Harrington**, Director of Packaging Sustainability, Research & Innovation, Danone North America
- **Treasurer: Jeff Bezzo**, Executive Director - Plastics Sustainability PMO, SC Johnson
- **CJ Stolle**, Head of US Circular Economy Public Policy, Amazon
- **Stewart Lindsay**, Chief Sustainability Officer, The Campbell's Company
- **Kirsten Witt**, Director, Public Affairs & Communications, The Coca-Cola Company
- **Anne Bedarf,** Director, Global Packaging and Plastics Sustainability, Colgate-Palmolive
- **Lauren Aguilar**, Director of State and Local Government Relations, McDonald's USA, LLC
- **Eadaoin Quinn**, Sustainable Packaging Senior Manager, Mars, Incorporated
- **Brie Seferian,** Senior Manager, EPR North America, Mondelēz International
- **Nicole Flaherty**, Senior Manager, Recycling, Nestlé, USA
- **Rachael Lawrence**, Senior Director, Sustainability, PepsiCo
- **Scott Heid,** Vice President - North America Business & Product Stewardship Integration, Procter & Gamble
- **Megan DeBates**, Government Affairs and Public Policy Advisor, Starbucks
- **Lisa Linnell**, Senior Manager – Sustainability Policy, Target
- **Amanda Humes**, Director, Packaging Stewardship, Conagra Brands
- **Kelly Smith,** Vice President, Head of Institutional Affairs, Ferrero
- **Lee Anderson**, Vice President of Government Affairs and Public Affairs, General Mills
- **John Salvador**, Director of Stewardship & Sustainability, Georgia-Pacific
- **Anders Persson,** Regulatory Affairs Leader, IKEA
- **Heidi Hairston**, Senior Director of Procurement Sustainability, The Kraft Heinz Company
- **Nicol Sobczyk Costello**, Vice President Circular Economy, L'Oréal North America
- **Steve Toeniskoetter**, Assistant General Counsel, Regulatory, Niagara Bottling, LLC

Appendix C: Documentation demonstrating adequate financial responsibility and financial controls to ensure proper management of funds and payment of the registration fee (to the Commissioner).

115A.1443 Subdivision 1.
(5) documentation demonstrating adequate financial responsibility and financial controls to ensure proper management of funds and payment of the registration fee required…

Documentation of CAA Financial Responsibility and Internal Financial Controls for Minnesota State Extended Producer Responsibility Program

1. Organizational Financial Responsibility
Circular Action Alliance Minnesota, LLC (CAA Minnesota) is a legally formed Producer Responsibility Organization established to administer Extended Producer Responsibility (EPR) obligations on behalf of participating producers in Minnesota. The organization maintains the financial capacity and governance structure necessary to ensure the prudent management of program funds and the fulfillment of all financial obligations required by the Minnesota Pollution Control Agency (Department).
Financial responsibility is demonstrated through:

- **Dedicated Program Funding Model** – Programs are funded by producer EPR fees assessed under a CAA's approved fee methodology designed to fully fund program operations, regulatory compliance, education/outreach, and administrative costs.
- **Operating Reserves** – The organization maintains an operating reserve sufficient to ensure continuity of operations and payment of regulatory obligations, including the annual registration fee, in the event of revenue timing fluctuations.
- **Financial Oversight by Governing Body** – The CAA Board has fiduciary responsibility for financial oversight, budget approval, and monitoring of financial performance.

2. Financial Management Framework
CAA maintains a structured financial management framework designed to ensure accountability, transparency, and compliance.

a. Budgeting and Forecasting
- An annual operating budget is prepared by management and reviewed and approved by the Board.
- Budgets include projected program costs, regulatory fees, contractor payments, and administrative expenses. CAA will coordinate with the Department as needed to gain estimates of annual registration fees for planning purposes.

- Financial performance is monitored against budget regularly, with variances reviewed by management and reported to the Board.

b. Accounting System

- The organization uses a formal accounting system that:
  - Accurately records all financial transactions
  - Maintains audit trails
  - Supports financial reporting and regulatory documentation
- Accounting records are maintained in accordance with **U.S. Generally Accepted Accounting Principles (GAAP)**.

3. Internal Financial Controls

CAA Minnesota has implemented internal control procedures consistent with best practices for nonprofit and program stewardship organizations to safeguard assets and ensure appropriate use of funds.

a. Segregation of Duties

Financial responsibilities are divided among personnel to reduce the risk of error or misuse. Key separations include:

- Authorization of expenditures
- Processing of payments
- Recording of transactions
- Reconciliation of accounts

No single individual has end-to-end control over financial transactions.

b. Disbursement Controls

- All payments require appropriate documentation (contracts, invoices, approvals).
- Payments are subject to multi-level approval thresholds based on dollar amount.
- Electronic payment access is restricted to authorized personnel.
- Vendor onboarding includes verification procedures.

c. Cash and Bank Controls

- Bank accounts are reconciled regularly by personnel independent of payment authorization.
- Access to banking platforms is limited and role-based.
- Dual authorization is required for significant electronic disbursements.

d. Financial Reporting

- Management prepares periodic financial statements for review by leadership and the Board.
- Financial results and cash flow are monitored to ensure ongoing solvency and liquidity.

4. Assurance of Payment of Annual Registration Fee

CAA Minnesota ensures timely payment of the Department's annual registration fee through the following mechanisms:

- The annual registration fee is included as a line item in the approved annual budget.
- Funds are collected through producer fees structured to cover all regulatory obligations.

- The organization maintains sufficient liquidity and reserves to ensure payment regardless of short-term timing differences in fee collections.
- Responsibility for regulatory payments is assigned to designated financial personnel with oversight by senior management.

5. Independent Oversight and Transparency

To further demonstrate financial integrity:

- The organization undergoes an independent financial statement audit.
- Financial records are available for inspection by regulators as required.
- Governance policies include conflict of interest standards and fiduciary responsibilities for Board members.

Appendix D: Copy of the written agreements that have been signed by each member producer

115A.1443 Subdivision 1.
(3) copies of written agreements with each producer stating that the producer agrees to operate under an approved stewardship plan administered by the producer responsibility organization

Please see PDF attachments titled:

- Participant Producer Agreement (PPA) - Final
- Minnesota Interim State Addendum to PPA – FINAL

Appendix E: A list of all member producers that have entered into written agreements to operate under an approved plan by the PRO

115A.1443 Subdivision 1. (a)
(2) a list of all member producers that have entered into written agreements to operate under an approved stewardship plan administered by the producer responsibility organization and, for each producer, a list of all brands of the producer's covered materials introduced

Please see PDF attachment titled: CAA Minnesota Producer List June 22 2026