

December 22, 2025

Minnesota Pollution Control Agency
c/o Mallory Anderson
520 Lafayette Road N
St. Paul, MN 55155-4194

Re: Partnership on Waste and Energy Comment on the Draft Preliminary Assessment Required Under the Packaging Waste and Cost Reduction Act

Dear Ms. Anderson,

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. The Partnership seeks to end waste, promote renewable energy and enhance the health and resiliency of the communities we serve while advancing equity and responding to the challenges of a changing climate.

The Partnership played a key role in laying the groundwork for and securing passage of the Packaging Waste and Cost Reduction Act (Act). This included coordinating extensive stakeholder engagement to build support for what became the most significant waste reduction and recycling legislation passed in decades. The Partnership has a significant interest in seeing the Act is implemented effectively to achieve the important outcomes established in the Act. It is in that spirit that the Partnership submits the following comments on the draft Preliminary Assessment.

The Partnership recognizes the short timeframe within which the Minnesota Pollution Control Agency (Agency) and its project consultants were given to complete the work called for in the Preliminary Assessment provisions of the Act. The task at hand is significant. The commencement of work, unfortunately, was too late to allow the production of the kind of report needed at this stage of implementation of the Act. The intention of the Preliminary Assessment is to compile information critical to the completion of the Needs Assessment by the statutory deadline of December 31, 2026, and subsequently the assembly of the stewardship plan. We are very concerned that the draft report does not adequately meet that charge.

The draft report acknowledges gaps in certain categories of data required to be included in the Preliminary Assessment. Similarly, some of the information presented appears to be incorrect or based on sources, methodologies, estimates or assumptions that are not clearly identified. This makes it difficult to independently validate the accuracy or robustness of some of the information, reducing the confidence in some of the data and findings and how they will be used. For example, incomplete identification of facilities in the solid waste and recycling system, including non-licensed operations, or overlooking the existing network of organics drop-off sites in Hennepin, Ramsey and Washington counties conveys an inadequate picture of the current reuse, recycling and composting system.

The report contains many maps that are hard to comprehend, with suboptimal resolution or high numbers of overlapping dots making it impossible to interpret locations and counts of represented features. It would be helpful if some of these maps were accompanied by complete documentation,

such as the underlying lists of solid waste system features to allow identification of potentially outdated, incorrect or missing features. An example would be including a list of organics drop-off sites depicted in the map in Figure 5 in an appendix and breaking out at least the metro region for a more readable map, or distinguishing between yard waste compost sites and MSW transfer stations now combined in the regional Transfer Stations maps.

The draft report uses some key terms and concepts inconsistently and lacks definitions for some of them. Greater specificity and clarity of intent and meaning are needed to guide program planning and implementation and ensure compliance with the scope and intent of the Act. For example, public spaces, public entities and public buildings seem to be used interchangeably without definitions or apparent consistency with statutory language, recycling markets is undefined, composting is sometimes included under recycling and MSW is not consistently distinguished from recyclable materials when referencing organized collection.

The Partnership strongly supports extending the completion deadline to allow for a Preliminary Assessment report that:

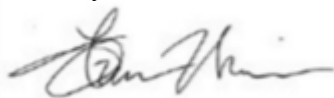
- Provides a comprehensive list of what data is needed.
- Presents fully vetted data.
- Clearly identifies data that does not fully meet that threshold or is missing and how those weaknesses and gaps will be addressed in the Needs Assessment in 2026.
- Uses terminology consistently and clearly defines key concepts and terms for a common understanding and interpretation of data and findings.
- Presents maps and graphics in ways that are easy to understand.
- Elaborates on how the Agency will involve counties and other interested parties in the next stage of research.
- Shares key milestones and timelines for the work planned in 2026, including addressing known gaps or inadequacies in the completed Preliminary Assessment.

The counties in the Partnership stand ready to serve as resources to the Agency and its consultants in future efforts to gather, confirm or clarify missing or problematic information to improve confidence in what is presented in the completed Preliminary Assessment. We encourage the Agency to work proactively with counties to refine the data and gather high-quality information.

Looking forward to the Needs Assessment, we support the creation of regular opportunities for input as that work proceeds, rather than relying on a single public comment process. Continuous collaboration will improve assumptions, prevent data inaccuracies and build better framework for implementation.

The Partnership strongly encourages the Agency to take the time necessary to complete the Preliminary Assessment in a way that creates a more solid foundation for the Needs Assessment and provides significant value to the implementation of the Act, with the aim to maximize benefits to all Minnesotans and achieve the important environmental goals presented in the Act.

Sincerely,



Commissioner Fran Miron, Washington County
Chair, Partnership on Waste and Energy