

Date: August 10, 2026

To: Alison Cameron, MPCA

From: Coalition for Plastic Reduction

Re: Draft Resource Management Report

The Coalition for Plastic Reduction is concerned about the impacts of plastic on our health and the environment. We support efforts to reduce waste overall and advocate for policy changes to move toward safer and more sustainable alternatives to plastic.

We want to thank the MPCA staff and consultants for their tremendous effort to collect information and research proposals that can be used to reach the ambitious goal to divert 90% of the waste stream from landfills and incinerators. We appreciate that Minnesota is investing in reducing waste and diverting valuable resources from the waste stream.

We also appreciate the opportunity to provide feedback on the draft report. The report contains a wealth of valuable information. We would like to offer our suggestions that may help clarify parts of the report and offer some additional suggestions to help reach the 90% goal. Our suggestions are as follows:

- **Add interim targets**
Add interim targets and share updates widely, to residents and CII, to show the progress being made and strengthen engagement with the public which will be critical for success. This also provides insight into where changes are needed if targets are not being met.
- **Add Acronyms and Definitions**
Include acronyms and definitions for all terms and use them consistently. MSW is one term that appears to be used inconsistently.
- **Prioritize Waste Reduction in the Report**
Reduction is at the top of the waste hierarchy. It should be prioritized as the top strategy. It is sometimes missing, called prevention or combined with reuse in the report. Reduction strategies should be clearly laid out in the report to show what options could be used to reduce the amount of waste generated.

Reduction should be included as its own topic in every section. It can be measured by comparing per capita year over year. The section "Current MSW Waste Management Infrastructure" should include the policies and procedures that are in place currently that prevent waste from being generated. There are some examples like sporting events that provide reusable cups, but there should be more clarity on what is currently being done to reduce waste.

On page 44, 'Prevention levers used in the model' includes some items that are good examples of reduction, such as 'plastic film' and 'single-use food service packaging.' More details should be included to clarify how the 'Prevention' total of 585,874 (10%)

was calculated in the model and how it could be accomplished.

We recommend adding a per capita reduction target in addition to the diversion targets. Minnesota generates an average of 5.63 pounds of waste per capita per day – more than one ton a year. A per capita reduction of 1% per year between 2027 and 2045 could have a significant impact. It could also encourage engagement with the public which will be critical to reach the 90% diversion goals.

$$\text{Reduction \% of MSW} + \text{Diversion \% of MSW} = \text{Goal of 90\% of MSW}$$

- **Update 'Program, Regulatory, and Policy Initiatives' section**

- **EPR Programs**

- Minnesota has several strong, successful EPR programs. Implementing the packaging law should have a big impact in reaching the 90% goal..

- For some challenging materials, like plastic film and expanded polystyrene, other cities, states and countries have shown that bans are effective and should be prioritized over using an EPR program to manage the waste.
 - Expanding the EPR program for electronic waste would also reduce the amount and toxicity of waste and recover valuable resources.

- **Organics Collection**

- Organics are a large component of the waste stream and addressing this with effective policies and programs will have a significant impact. There were many excellent suggestions for organics policies and we are glad to see this prioritized in the report.

- **Alternative Collection Systems**

- Addressing difficult-to-recycle material will be key to reaching the 90% diversion goal and increasing drop-off options will play an important part.

However, counting on drop-off sites to manage hard-to-recycle plastic is not realistic. A different approach is needed for plastic where the focus should prioritize eliminating unnecessary plastic or finding alternatives rather than trying to capture the material and find an end market for it.

Plastic production drives plastic waste. Production has doubled in the last twenty years and continues to increase. This will be a never ending, unsolvable challenge unless we focus action on true sustainable options.

Switching from single-use to reusable options can have a significant impact on reducing the amount of waste generated and also save money.

Here are some suggestions for doing this:

- The EU Packaging and Packaging Waste Reduction Regulation (PPWR) has a requirement that, from 1 January 2030, economic operators in the EU must ensure that at least 40% of transport and sales packaging is reusable. This requirement applies to formats such as pallets, foldable-plastic boxes, boxes, trays, plastic crates, intermediate bulk containers, pails, drums, and canisters, including pallet wrapping and straps.

https://environment.ec.europa.eu/news/pallet-wrapping-straps-exempt-100-reuse-requirement-2026-02-25_en

MyPlas, a film recycling business in Rogers, MN closed shortly after opening, despite significant investment from Minnesota businesses.

Rather than focusing just on trying to expand end markets for material like films, partner with EU organizations that are working on reusable solutions to reduce the need for film.

- Throughout the report there are suggestions that plastics #3-#7, #6, and bulky plastic can be managed through drop-off sites and give the impression that if they are collected, they can be successfully reused or recycled. For most of these plastics, that is not likely. Hopefully, Minnesota facilities are not exporting plastic waste to developing countries like Vietnam, Indonesia or Malaysia but according to reporting from the Basel Action Network, these countries are receiving an overwhelming amount of plastic waste, despite laws that ban this practice.

A better approach would be to phase out plastics like film, bags and expanded polystyrene rather than spend resources on collecting them. It is unlikely they can be recycled but even if they were, these new plastic products will return to the waste stream as another hard-to-recycle item.

- o **Deposit Return System**

Enacting a deposit return system would be a great opportunity to reduce waste and keep valuable resources, like aluminum, out of the disposal stream. It has been proven to significantly increase capture rates and would foster a return to bottle refill systems. We appreciate that it was included in the report.

- o **Recycled Content**

PCR should be required for all materials, except plastic. Twenty five percent of the 16,000 chemicals used to make plastic are considered hazardous. More than half have not been tested and do not have any safety data. Because of this, plastic should not be prioritized for PCR. Studies have shown that recycled plastic is more hazardous than virgin plastic.

The report contains some good examples of plastic being recycled into plastic trash bags and similar items, but recycled plastic should not be used for packaging, especially food packaging. As mentioned in the section 'Pollutants of Concern,' plastic is made with toxic additives, and these pose a risk to our health and to the environment. A growing body of research shows they are especially risky for developing fetuses and children.

- o **Spurring Innovation and Supporting End Markets**

Funding and market development should not include chemical recycling. This is a false solution to address difficult to recycle plastic. It has been attempted for more than twenty years and is still in the 'pilot' phase. It usually produces fuel rather than material used to manufacture plastic and it has been shown to be highly polluting.

- o **Disposal Bans**

Disposal bans have worked in Minnesota for yard waste, and several other materials. They send a strong signal to residents and CII that certain things don't belong in the waste stream. The statement "disposal bans are not sufficient to drive meaningful increases in recycling," highlights that too often the focus is on increasing recycling rates rather than preventing waste generation. Increasing recycling as an end is not the goal; the point is to reduce what ends up in the waste stream. Reduction is the top of the hierarchy and the most effective action. If there are alternatives, such as reusable bags, a ban should be prioritized over trying to recycle an item.

- o **Local Policy Considerations**

In addition to the excellent local policy suggestions, add a state-wide section to include policies that have been shown to be effective. Expand suggestions to include:

- Ban plastic bags from being given out by grocery and retail stores.
- Pass a 'Skip the Stuff' law.
- Require eat-in restaurants, schools, and institutions to use reusable dinnerware. Studies have shown this can significantly reduce waste and save money.
- Phase-in requirements that events be zero-waste.
- Use successful programs like Green Step Cities to share suggestions for using plastic alternatives, reducing waste overall, and increasing recycling and composting.

- **Human Health and Cumulative Risks**

We appreciate the valuable information that you have included in the section Human Health and Cumulative Risks. The Social Vulnerability and Environmental Justice information was especially helpful. It highlights how overburdened the 4th quartile is currently. It also shows that reaching the 90% goal is possible without WTE and that scenario improves the burden on the 4th quartile. We support adopting that option.

Also, Table 38 should be updated to include PFAS in WTE facilities. The MRRA test of the HERC found that PFAS was found at low levels in the emissions, fly ash and bottom ash.

- **Engage the public**

The 90% diversion goal will be very challenging to accomplish. What happens to the trash and recycling after it's put by the curb or dropped off is not something most people contemplate. Full participation will be needed from residents and CII. Asking for help to generate creative solutions is a positive way to educate them on the need to achieve the 90% goal and to get valuable ideas and suggestions to accomplish it. Education should go beyond 'how to' instructions and more toward 'help us solve the trash problem.' The report does include education components, but it should be expanded to more fully engage the public.

- **Improve Clarity of Data in Tables and Figures**

There is a tremendous amount of important data throughout the report, however, too often the data is split between multiple tables giving only a partial picture, titles are not clear and totals are missing. If information were combined into fewer tables, it would be possible to get a clearer picture of the amounts generated, recovered

(recycled/composted), and remaining in the disposal stream. It would also make it easier to estimate what facilities or programs would be needed to capture more from the disposal stream.

- o It would be helpful to have this information combined so that it shows all the information in one location similar to this example from the SCORE dashboard.

Materials	Recycled tons	Wasted tons	Total generation	Capture rate
Aluminum cans	13,489	13,954	27,443	49.2%
Aluminum ingot	31,104	24,419	55,523	56.0%
Building materials	128,106	198,838	326,943	39.2%
Carpet	31	80,233	80,263	0.0%
Copper wire	53,425	94,186	147,611	36.2%
Food waste	216,424	620,931	837,355	25.8%
Glass	192,477	62,791	255,268	75.4%

- o Tables and figures should have more precise titles to indicate what is being shown and should not rely on nearby text.
- **Reduce dependence on Mixed Waste Processing**
The 'Recommendations' section (page 182), indicates that MWP should be used "as a last resort" and recognizes higher costs and lower material quality compared to source-separated systems. Under 'Pathway to the 90% Diversion Target,' it is modeled as a supplemental "safety net" and that recovered material is typically lower quality and more contaminated and facility costs are high.

However, Table 19 (page 56) shows that the diversion model has **18%** of the total MSW being recovered from Mixed Waste Processing facilities. Recovering metals is currently being done in Minnesota. Many of the other materials listed do not seem realistic to recover from MWP, including various types of paper, plastics #1-7, cardboard, and organics. All these materials could be contaminated and should not then be processed through the regular recycling or organics processes. It would be better to put resources toward capturing these materials through source-separated recycling facilities or drop-off sites than pulling them from the disposal stream.

Table 19. Tons to each material management strategy for the 90% diversion model

Material management strategy	2021 baseline	90% diversion
Prevention	-	585,874
Reuse	36,042	240,123
Source-separated Programs	2,458,3499	3,385,111
Mixed Waste Processing		1,044,764
Remaining in Disposal	3,368,524	607,043
Total	5,862,915	5,862,915
Diversion Rate (excl. prevention)	43%	90%

The possible scrap values in Table 32 (page 81) seem high for many of the MWP materials. An R&E Center analysis from 2018 estimated an overall expense to pull these additional materials using MWP.

https://recyclingandenergy.org/wp-content/uploads/2020/12/M-Pre-Processing-a-Analysis-for-Recovery-of-Recyclables-using-PP_June-12-2018.pdf

- **Clarify Prevention and Reuse numbers**

Table 15 (page 45) includes percentages for prevention and reuse by material type, but it is not clear how these percentages were calculated. Please include more detail on how these numbers would be achieved, especially for aluminum cans.

Also, the table includes 30% reduction for PET #1 and #2 bottles and non-bottles and targets prevention percentages for other plastic types. This is welcome news. It would be good to be able to tie policy or programs suggestions to these to know what steps are needed to achieve them.

We appreciate your consideration of our comments.

Sincerely,

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