



June 17, 2026

Minnesota Pollution Control Agency
Attn: Alison Cameron
520 Lafayette Road N
St. Paul, MN 55155

RE: NWRA Comments on the Resource Management Report

Dear Ms. Cameron:

The National Waste & Recycling Association Minnesota Chapter (NWRA MN) appreciates the opportunity to comment on the Draft Resource Management Report issued for public comment May 2026 by the Minnesota Pollution Control Agency (MPCA). We provide the following comments for your consideration.

Our recommendations are highlighted in bold throughout the letter.

Source Separation: NWRA MN fully supports state and local government efforts to reduce waste and maximize the amount of material recycled from the waste stream. It is our firm belief that we need to focus on extracting as much material as possible at the source, prior to being placed in the waste stream. Whether reduction in consumption, reuse, refurbishing, recycling, or composting, these management methods require significant behavior changes.

The report finding that Minnesotans have about the same per capita disposal rate as neighboring states—yet a much lower overall disposal rate—is encouraging and should also be attributed to a strong public private partnership, not just regulatory and legislative pressures.

Private sector investment in infrastructure and our efforts to change behavior should be mentioned in the report. The private industry's drive to innovate and bring new recycling methods, build new MRFs, and educate our customers on methods like Single Sort recycling, have made significant impacts on our state recycling rate.

These private sector efforts have been driven due to free market pressures, strong end markets and customer demand, in addition to the regulatory and legislative framework that is highlighted in the report.

Infrastructure Investment: The 20 year investment to achieve a 90% recycling rate by 2045 is nearly \$1B and involves significant behavior changes to buying habits and generator management methods. **Curbing people's buying habits and shifting to the purchase of used and refurbished items will be significant challenges that the report should identify.**

Investment from both the public and private sector will require significant subsidization and strong end market demand to support expansion of already existing recycling capacity. With recent upgrades, our existing MRF capacity is prepared for additional projected volumes resulting from Extended Producer Responsibility (EPR) and likely, incremental implementation of the Comprehensive Drop Sites (CDS) discussed in the report. If there is additional volume, consumer demand and strong end markets, the private sector will respond by expanding existing investments.

The report should allow for additional private sector investment in infrastructure, account for packaging reduction due to national EPR impacts, recycled content measures, increased volume due to recycling mandates and any other policy changes, before considering or recommending additional capacity.

It is not clear if the over 300 CDS recommended will include traditional recyclable materials as well as harder to handle items like paint, mattresses, batteries, etc. Current MRFs were built to manage regional capacity, with some of them receiving material from the surrounding states. If traditional recyclables are collected at these recycling depots, we have concerns about filling capacity at our existing facilities.

Will the CDS rob our facilities of the traditional recycling material that were built to depend on this volume? Are an additional 20 MRFs in the state really needed or is there a different definition of "MRF" that the consultant used?

The report should provide a definition of "MRF." The report should also provide more detail on exactly what materials will be brought to these CDS and what additional new end markets will be needed for non-traditional materials, since the EPR Needs Assessment should identify end market capacity needs for traditional materials.

How will material be brought to the CDS? Will generators separate the material at the point of generation and then drive it to the CDS or will it be collected at the curb or some combination of the two?

Either way, the report should analyze fuel use and GHG emissions generated with residents and businesses transporting these items to CDS.

The report should take into account or recommend a life cycle analysis to better understand the environmental trade-offs, and cost/benefit of the expansion of collection and transportation of these additional materials, some of which may have very little disposal impact and low market value.

And, if traditional recyclable materials are collected at CDS, the impact on the existing MRF infrastructure needs to be analyzed.

Last, while the report extends into C&D recycling/recovery—on page 42, under “CII strategies” and Pg 45 “deconstruction & building materials”—C&D recovery levels will be extremely difficult to improve without new/increased end markets and demand.

Most reusable/recyclable C&D materials are already being pulled out of the waste stream at the job-site or at C&D recycling/disposal facilities and simply are not being tracked or reported.

Regarding organics management, our industry fully supports additional organics recovery and infrastructure. At over 40% in the waste stream, over 60% of the food waste thrown away could have been managed differently or with changes in buying habits, portion control, etc. would not have been purchased or generated by the consumer.

As mentioned previously, NWRA has always supported separating materials at the source, rather than reliance on mechanical means of extracting traditional recyclables from the waste stream.

To that end, we agree with the report’s assessment of Mixed Waste Processing being a “technology of last resort” or used only to supplement source separated efforts, but again, the cost/benefit of a “last resort” method would still be extremely costly to the taxpayers of Minnesota, who are also our customers.

And while the report does cover pre-processing of waste prior to disposal, we question how the MPCA intends to enforce this requirement on waste that goes out of state.

Given the report’s perspective on MWP, we would hope that local governments would be advised not to make general obligation bond requests of the legislature and that the MPCA, through the solid waste Capital Assistance Program and other funding mechanisms, would focus more on the top of the hierarchy.

This report appears to discourage continued, heavy investment in the very expensive transformation of older WTE facilities into upfront mixed waste and recycling facilities.

We also note that the DSI MRF in Lakeville is not included on p. 38. Is this a typo or was data from this facility not included in the report but was included in the analysis? If so, please be sure to correct this mistake.

Last, we recommend an increase in SCORE dollars to local government, in addition to a re-evaluation of all funding sources after the successful launch of EPR in 2029. as part of determining the amount of funding for the recommended EPR enhanced recycling system.

Technical Overview: The report has multiple qualifications including using only publicly available data, a limited data set, and many references to data uncertainties. The question then is, how valuable is the Health Risk Assessment, the Social Vulnerability Index, and the Ecological Potential Risk Assessment?

Further, as with any scientific study, when the foundation of the study is limited or inaccurate data, as you overlay other information (in this case the map overlays), the “science” of the study is compromised even further. That is the case with this study. **We urge the MPCA to exercise extreme caution with drawing conclusions based on poor quality data.**

The report presents only a select group of parameters per waste management method (p.108, ATSDR, statement).

Several tables do not show the presence of PFAS at WTE despite the recent April EPA Guidance Document that continues to state that PFAS is not destroyed through incineration, and that there are byproducts of PFAS destruction at incinerators that need to be considered.

These tables should be changed to include PFAS at WTE facilities and the text should be changed to incorporate EPA’s recent position on PFAS management in their recent Guidance Document.

Overall, the technical assessments in the report draw the conclusion that overall, management of waste has impacts and that these impacts simply shift from one technology/method and on to different populations, as stated on p. 162:

“Diversion alters the spatial distribution and dominant exposure pathways of ecological concern rather than total pressure outright.”

This means that managing waste has impacts on human health and the environment no matter what method is chosen; where, who and how that waste impacts is simply moved around and shifted to different facilities and different populations.

The logical conclusion is that it shouldn’t be generated in the first place, but the report fails to address stemming the tide of consumer behavior and the monumental challenge that will be.

The report needs to emphasize this key societal phenomenon: consumerism and getting people to stop buying so much stuff.

Government Control: Overall, the report attempts to justify significant government control based on limited data, data uncertainties, and sometimes faulty information and conclusions. Although the MPCA stated on their June 3 webinar on this Resource Management Report, that the document is not regulatory or enforceable in nature, NWRA has concerns about the MPCA using these analyses, particularly the risk analyses to guide decision making related to siting, expansions and permitting waste facilities.

Further, to implement the vision articulated in the report will require significant funding, high levels of subsidization which ultimately mean requests for funding from the legislature and feeds the desire for some counties to have high levels of control over the free market.

Again, the report is just a “screening tool” based on poor quality data, should acknowledge and clearly state the objective of the report and include statements about protecting the investments that have already been made.

Further, the report needs to emphasize that it is neither a planning nor a regulatory/enforcement document, as stated on the MPCA June 3 webinar on the report.

And although the MPCA stated on the June 3 webinar that this report is not a regulatory document that they have no intention of enforcing the policies and vision presented in the document, it has been our experience that similar reports and plans have served as foundational documents that set future actions, whether legislative or regulatory.

Last, other stakeholders can view and use these policies to bolster plans for future development of solid waste systems and technologies that have not been fully vetted or are not supported by the solid waste market.

Report Goals: Securing additional funding, especially given the \$1B capital investment and ongoing, greater than \$300M annual operating expenses, even if it is over a 20 year period, will result in significant impacts to residents and businesses in Minnesota, while only shifting the impacts of managing waste to other facility types and populations.

We question where the funding will come from to achieve this vision.

Further, given the reliance on some key waste streams to achieve the overall goal of 90% by 2045, such as C&D waste and perhaps some of the hard to manage materials—neither of which are currently counted toward the MSW recycling rate—NWRA questions whether these goals are achievable, whether other legislative and regulatory reporting changes need to occur and again, at what cost to consumers?

To elaborate on whether the report goals are achievable, a good example is our current MRFs and their struggle to meet the 85:15 processing requirement, despite receiving source separated material.

NWRA applauds the Resource Management Report’s focus on policies that advance waste reduction and reuse, recycled content, and behavior change through education.

These policies have the greatest merit and the NWRA is fully supportive of these types of efforts; however, to achieve the overall vision of this report will take significant public and private investment, in addition to turning the tide of consumerism in our society.

We do not support increased taxes or fees on our industry services to support infrastructure development presented in the report because ultimately, those costs drive up our customers cost, the costs for Minnesota taxpayers, and inadvertently could compete with and undermine existing infrastructure investments.

Thank you for your time and attention to this important matter. Please feel free to contact us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Shaffer', with a long horizontal flourish extending to the right.

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Cc: Kirk Koudelka, MPCA Assistant Commissioner
Packaging Extended Producer Responsibility Advisory Board