MINNESOTA CHAMBER OF COMMERCE

GROWING MINNESOTA

August 7, 2026

Ms. Alison Cameron
Minnesota Pollution Control Agency
520 Lafayette Rd.
St. Paul, MN 55155

Ms. Cameron:

I write on behalf of the Minnesota Chamber of Commerce (Chamber), a statewide organization representing more than 6,300 businesses and more than 500,000 employees throughout Minnesota, commenting on the May 2026 Draft Minnesota Resource Management Report (draft report) from the Minnesota Pollution Control Agency (MPCA). As directed by Minn. Stat. 170.27, the draft report must, among other actions, issue recommendations and study the feasibility of meeting the goals detailed in the study.

The recommendations made by the report are concerning and will be costly, if even feasible. For example, achieving 90% diversion by 2045 will require massive investments from both public and private sources, with all responsibility ultimately falling onto the taxpayer. The report cites a requirement of $1 billion in capital investment and over $200 million annually in operating expenses to reach 90% diversion. An increase in public investment of this magnitude translates to tax increases; meanwhile, producers of covered products will face even further funding obligations, be it as further fees assessed by the Producer Responsibility Organization (PRO) as part of the Extended Producer Responsibility (EPR) law or through other mechanisms.

Further, the risk assessments detailed in the draft report rely only publicly available data, a limited dataset, and contain references to data uncertainties. Therefore, the Health Risk Assessment, Social Vulnerability Index, and Ecological Potential Risk Assessment may lack value and not depict reality. We therefore urge MPCA to exercise discretion when drawing any conclusions based on the risk assessments referenced.

Last, the draft report incorrectly reclassifies waste to energy (WTE) as disposal. This is in direct contrast with Minn. Stat. 115A.02, which places waste to energy above landfilling.

The Chamber understands and appreciates that MPCA must fulfill its statutory obligations. However, nowhere in statute does it require adoption of any policy recommended in the report. Using goals in an official agency report can be interpreted by states and local governments as standards, creating a de facto mandate, which in turn drives local policy decisions, permitting activity changes, and more. Therefore, the Chamber strongly recommends clarifying language in the report articulating that idealistic goals are not binding mandates.

Sincerely,

Andrew Morley
Director, Environmental Policy
Minnesota Chamber of Commerce
amorley@mnchamber.com
763-221-7523