

August 10, 2026

Minnesota Pollution Control Agency



RE: Comments to the Draft Resource Management Report (May 2026)

To whom it may concern,

The Minnesota Composting Council (MNCC) appreciates the opportunity to provide comments on MPCA's Draft Resource Management Report released in May 2026. The Minnesota Composting Council is a non-profit organization dedicated to the development, expansion, and promotion of the composting industry in Minnesota based on sound science, principles of sustainability, and economic viability.

We appreciate the acknowledgement that compostable materials make up the largest portion of MSW. As such, we hope the MPCA and the Minnesota legislature provide increased funding for the industry overall (facility development, program development, market development for finished compost) and additional staffing at the agency to appropriately support the industry. There are more staff dedicated to supporting waste reduction, diversion of edible food, recycling and landfilling than there are for supporting composting and management of organics that are not suitable for food / animal consumption. With this being the largest fraction of MSW, it seems pertinent that MPCA allocate more resources to support the industry. The MNCC is here to help.

The MNCC provides the following comments on the organics-related sections of the report.

Please let us know if you have any questions or would like clarification.

Sincerely,

Minnesota Composting Council Board of Directors

Terms used and lack of definitions provided

The report does not have a definitions section and uses many words to describe ‘food’ or materials managed through ‘organics recycling’ or ‘composting’. Clarification of the following terms and verifying consistent usage throughout the report would help to make sure information in the report and interpretation of the content is clear:

- Organics / organic material / organics recovery (recommend replacing ‘organic waste’ as well)
- Wasted food / food waste / SSO
- Compostable paper / Compostable paper and packaging
- Other organics
- Non-recoverable paper
- Recyclable wood

Here are two examples showing how clarification throughout the report of these terms would be helpful. Note that every instance where one of the terms above is used in the report should be evaluated to make sure the correct term is used for the intended interpretation.

- P. 17: ‘...wasted food made up the remainder...’;
 - Assumed that this includes the inedible parts of food (e.g. pits, peels, bones, etc.) but does it also include compostable paper, compostable plastics and other items accepted for composting?
- P.24-26: Figure 8: Top MSW disposal categories from residential sources
 - Categories of ‘wasted food’, ‘other organics’ and ‘compostable paper’
 - Without definitions, it’s unclear where the following belong in this figure: yard waste, compostable plastics, other household compostable items like hair, coffee filters, etc.
 - Also recommend splitting wasted food (edible food) from food scraps (inedible food).

Comments by section of the report

- P. 35: Recycling and Organics Infrastructure
 - Categories include ‘SSO facilities’. Do all MSW compost facilities now have SSO permits? Or should this say SSO / MSW composting facilities?
 - AD facilities should not be included as an ‘SSO facility’ – they do not have an SSO permit; some only accept manure and some may in the future accept MSW fines. AD facilities should be their own category.

- P. 49: Source-Separated Organic (SSO) Recovery Program: ‘...minimizing contamination from non-compostable materials, which reduces the need for costly removal process and helps address environmental concerns, including PFAS.’
 - PFAS are too often associated and primarily attributed to an issue in organics and food-service packaging. A law prohibiting intentionally added PFAS in food packaging went into effect in 2024 ([325F.072](#)).
 - The report does not associate or attribute issues with PFAS in other waste, where there are many more products that contain(ed) PFAS products.
 - Other laws related to the PFAS that should be noted in the report, at least in the impacts sections, include: Effective Jan. 1, 2025 banned another 11 categories of products from having intentionally added PFAS ([116.943, Subd. 5a](#)), and products must report added PFAS by Sept. 15, 2026 ([116.943 Subd. 2](#))
- P. 50: TCMA organics programs – inaccuracies / information missing
 - Hennepin County
 - ‘requiring curbside organics for single-family homes’ – the County requirement is for single-family homes for cities with more than 10,000 people. There are drop-off requirements for cities with less than 10,000.
 - Report should also reference that the Metro SWMP has a requirement for cities with a population greater than 5,000 are required to have residential organics programs by 2030.
 - ‘prohibits higher fees for organics service than trash’ – this is a State Statute not a county requirement and is referenced above in the program access and statutory framework bullet.
 - What is meant by ‘standardized program design’? There are several models used for residential organics program in Hennepin County: organics collected on their own, organics collected with yard waste, organized collection and also models where the City puts a requirement on licensed haulers to offer organics.
 - Why does it not reference the County’s commercial organics requirement? Greater MN programs and programs from other states include commercial programs.
 - St. Louis Park and Minneapolis
 - Why are these two programs specifically? Wayzata was first in HC; both SLP and MPLS are no-cost; MPLS has 20 organics drop-off sites and both have low contamination

- Suggested text updates: ‘...robust weekly no additional cost residential collection programs combining curbside and drop-off access (MPLS – 20 drop-offs, SLP – 11 drop-offs) that emphasize convenience and education, with low contamination (~1% in Minneapolis, ~2% in St. Louis Park)’
- Ramsey and Washington Counties
 - Report does not state
 - the program uses durable compostable bags that are separated out at R&E’s RDF facility or transfer stations in the metro
 - the full-roll out of Food Scrap Pickup program is anticipated end of 2027
 - some items (unbagged) will not be captured (e.g. delivery pizza boxes, other paper to-go products)
 - intention is for food scraps to be sent to an AD facility and the AD digestate to a biochar facility once both are constructed
- Shakopee Mdewakanton Sioux Community
 - Report calls out a compost site as a ‘program’. This seems unfair to other MN compost facility operators to call out one facility as a ‘program’. It is appropriate to call out that they are the only compost facility that offers hauling services, predominantly for CII.
- Other TCMA programs
 - Dakota and Scott called out. Carver and Anoka’s drop-off sites and haulers who offer curbside also expand access to suburban and rural areas. Biz Recycling, MNimize, and County grants to help businesses start/improve organics programs also not referenced.
- P. 51: Greater MN programs
 - Resource Renew – Report does not include information on their drop-off sites or the private hauler, Duluth Compost, who offers curbside collection.
 - Pope/Douglas – Report does not reference drop-off sites in region.
 - Polk County – Report does not reference other counties that feed into the system (Otter Tail and Beltrami listed separately)
 - Other programs not mentioned; those who have programs or those who have or are evaluating a program / development of an SSO compost facility using a MPCA Greater MN grant (e.g. Northfield, Sherburne, Olmsted [drop-offs opening soon], Winona, etc.)
- P. 51: CII models (Examples from other states)

- California (CALGreen), Portland, OR and Boulder, CO programs should not be referenced. The examples included are for C&D diversion requirements; this is an Organics section.
- P. 52: Mixed Waste Processing
 - “Organics capture in this process are typically unsuitable for composting but can be sent to AD, with the resulting digestate sometimes modeled as being further processed into biochar. This approach may help stabilize nutrients, reduce odors, and even support long-term carbon storage, though commercial applications, permitting, and end markets for MSW-derived biochar remain limited.”
 - Is this happening somewhere? Not aware of this practice actually occurring.
- P. 54: Clarify what’s all included in wasted food, other organics, compostable paper categories.
- P. 53: Tables on page 54 and 55 are referred to as tables 9 and 10 when they’re actually labeled table 17 and 18.
- P. 53 - 55: ‘Tables 9 and 10 summarize the maximum set of material categories recoverable through MWP in 90% diversion scenarios...’
 - Tables are labeled as 17 and 18 (not 9 and 10)
 - Table 18: Materials diversion rates for the 90% diversion model
 - include ‘under MWP’ in the title of the table for clarity.
 - ‘Paperboard Boxboard, Newspaper (ONP), Magazines, White Office, Mixed Paper, Gable-top and Aseptic Cartons Combined’ – listed as 5% diversion from Recycling and 80% Organics.
 - Please clarify. These are not materials that compost facilities want to or would accept, recycling should be prioritized.
 - What does ‘Compostable paper non-recoverable’ mean? It is listed as an organics diversion percentage of 100%.
 - How can the diversion model include such high percentages of the two categories above (Paperboard..., Compostable and non-recoverable paper) for Organics Diversion capture when the report notes that these materials recovered through MWP are typically unsuitable for composting (P. 36: Mixed Waste Processing) If ‘organics diversion’ here is referring to anaerobic digestion, the heading for the column should be updated to reflect both outcomes.
- P. 56: Figure 20 – Why are the SSO programs not separated by SSO recyclable materials vs. SSO compostable materials in 90% diversion model?

- P. 57: ‘achieving the 90% diversion scenario assumes near-optimal participation and capture rates across all programs, increased reliance on MSWP...’
- P. 71: Organics Management Facilities
 - ‘many yard waste sites do not operate as full composting facilities’. No discussion in the ‘cost’ section on the cost to modify these sites from a permit-by-rule (PBR) yard waste site to a SSO composting facility.
 - ‘high diversion rates for yard trimmings 87%’ – no reference to state yard waste ban and that’s not a great diversion rate for how long the ban has been in place.
 - Clarification between food waste, wasted food, yard trimmings, yard waste, other organics
- P. 75 – 76: ‘Processing infrastructure locations’: P. 76: Figure 29 title does not state ‘new’ SSO facilities. P. 75 describes Figure 29 as the ‘new’ sites. Several of the ‘new’ sites appear to be right where existing sites are located, should the Figure be updated to show existing and ‘new’ facilities (like Figures 28 and 30 do for existing vs new MRFs / MWP facilities)?
- P. 79: Processing Infrastructure Financial Investments: ‘composting facilities:
 - ‘composting facilities accepting SSO are generally less capital-and operationally intensive than MRFs and technically do not require fully enclosed buildings.’
 - What about enclosed buildings for Transfer Stations (contaminated materials) or depackagers (depackagers not referenced in the report at all – some will be necessary for meeting CII diversion standards for food scraps)? Report does not discuss how compost facilities should manage recyclable materials onsite due to depackagers.
 - References ‘leachate collection or treatment’. Minnesota does not classify water from composting facilities as ‘leachate’ but as contact water. Suggest updating this to reflect the rules for SSO sites.
 - Table 30. Estimated capital and operating costs for representative compost facilities
 - Believe the Capital cost, if this is referring to upfront cost to build the facility, is very low. The report references the ‘paved or otherwise engineered processing pad’, but does not discuss how costly it is to build that component alone, let alone costs for other equipment, stormwater or contact water management systems, etc.
- P. 81: Table 32. ‘Estimated total scrap value...’
 - Leaves and grass (why not yard waste / yard trimmings here? – introduced another term for yard waste

- Why is mixed waste processing value a higher \$/ton than source-separated for all compostable materials except ‘other organics’? Document notes limited markets for materials from MWP and that SS is prioritized – how can \$/ton be more, even incrementally more? (Same is true for some traditional recyclable materials: PET bottle, PET non-bottle, PP, Aluminum and possibly others, didn’t check all.)

‘VALUE / TON’	SSO tons	SSO value	SSO Value / ton	MWP tons	MWP value	MWP value / ton
wasted food	129860	2597200	20.000000	173953	3479100	20.00023
leaves and grass	22381	447600	19.999106	44074	881500	20.00045
other organics	81905	1638100	20.000000	172000	3440000	20
compostable paper	58631	1172600	19.999659	109444	2188900	20.00018

- P. 99: ‘Any new legislative requirements must also be paired with adequate funding for technical assistance, infrastructure investment, and compliance mechanisms. A lack of consistent enforcement has historically limited the effectiveness of Minnesota’s solid waste statutes.’
 - MNCC and others have continuously mentioned the need for MPCA ‘pollution reporting tool’ to be updated to make it more user friendly for people to report products not in compliance w/ the State’s Compostable Product Labeling law. If the reporting tool is not user friendly, people aren’t going to report non-compliance with this or other laws ‘enforced’ by the MPCA.
- P. 193 – Appendix A.7 Methods of managing organic waste
 - Change ‘waste’ to ‘materials’ in the title of the appendix.
 - Why does this section reference which SSO processing method is used by permitted compost facilities in Minnesota? Some have changed from one to another; this would be a good opportunity to include why the changes were made.
 - Anaerobic Digestion (AD) section states ...’digestate for soil amendment’. Report does not address that digestate may require additional processing.