

August 10, 2026



Minnesota Pollution Control Agency
520 Lafayette Road North
Saint Paul, Minnesota 55155

Re: Draft Resource Management Report

Dear Commissioner Kessler & Assistant Commissioner Koudelka,

The Minnesota Zero Waste Coalition appreciates the opportunity to comment on the Draft Resource Management Report. We commend the MPCA, Resource Recycling Systems, and the many stakeholders who contributed to this ambitious effort.

The report represents an important shift in Minnesota's approach to waste. It recognizes that achieving the state's goal of reducing disposal by more than 90 percent will require moving beyond traditional waste management and toward a comprehensive resource management system built on waste prevention, reuse, recycling, composting, and producer responsibility. We particularly appreciate the report's emphasis on upstream strategies, environmental justice, and the need for significant policy and infrastructure investments.

The Legislature directed the MPCA to identify a pathway for reducing disposal by more than 90 percent while maximizing environmental benefits and advancing environmental justice. Our comments focus on whether the draft report provides that pathway.

Overall, we believe the report establishes a strong vision for Minnesota's future resource management system. However, the final report should more clearly identify the actions, priorities, and policy decisions necessary to achieve the modeled 90 percent diversion scenario. In particular, we encourage the MPCA to strengthen the report in four areas.

Identify the Critical Path to 90 Percent Diversion

The report successfully describes what a 90 percent diversion system could look like. It models future diversion rates, estimates infrastructure needs, evaluates costs, and identifies a broad range of policy opportunities.

The report presents dozens of recommendations, but they are not prioritized or sequenced. As a result, it is difficult to understand:

- which recommendations are foundational to achieving 90 percent diversion;
- which actions should occur first;
- which require legislative action versus administrative implementation;

- which depend on successful implementation of Packaging EPR or other major initiatives; and
- how Minnesota should measure progress over time.

The final report should identify a clear implementation pathway that includes interim milestones, implementation phases, responsible entities, and measurable outcomes. Without that framework, the report serves primarily as a planning document rather than the implementation roadmap envisioned by the Legislature.

Align Investments with the Waste Hierarchy

One of the report's greatest strengths is its recognition that waste prevention and reuse provide the greatest environmental benefits and should form the foundation of Minnesota's resource management system.

However, the level of implementation planning does not yet reflect that priority.

The report includes detailed analysis of recycling infrastructure, compost capacity, mixed waste processing, capital costs, operating costs, and facility needs. By comparison, prevention and reuse receive relatively little discussion of implementation, investment, performance measurement, or long-term capacity building.

If prevention and reuse are the strategies expected to deliver the greatest environmental benefits, they should receive the same level of implementation planning as downstream systems.

The final report should identify:

- statewide waste prevention and reuse goals;
- infrastructure and workforce needs;
- funding strategies;
- implementation responsibilities; and
- performance measures that track waste generation, reuse, and repair—not just diversion.

Doing so would better align the report's recommendations with the waste hierarchy that underpins the entire resource management framework.

Connect the Policy Recommendations to the Diversion Model

The report models substantial increases in waste prevention, reuse, recycling, and organics recovery to achieve 90 percent diversion. It also identifies numerous policy tools that could support those outcomes.

However, the relationship between the two is often unclear.

The final report should more explicitly identify which policy recommendations are expected to produce the modeled increases in diversion.

For example, readers should be able to understand which recommendations are expected to:

- reduce waste generation;
- increase reuse;
- improve organics recovery;
- increase recycling capture; or
- reduce disposal.

Connecting the recommendations to the modeled outcomes would strengthen the report and provide policymakers with a clearer understanding of which actions are most important to achieving Minnesota's long-term goals.

Ensure the Pathway Maximizes Environmental Justice

One of the report's strongest contributions is its analysis of environmental justice and cumulative impacts. It recognizes that waste facilities have disproportionately affected overburdened communities and demonstrates that different resource management strategies have different environmental justice outcomes.

The Coalition encourages the MPCA to ensure that these findings are consistently reflected throughout the final recommendations.

Specifically, the final report should prioritize strategies that:

- prevent waste before it is created;
- reduce reliance on disposal and combustion;
- minimize pollution burdens in environmental justice communities;
- expand access to reuse, repair, recycling, and composting; and
- ensure that communities most affected by Minnesota's waste system continue to play a meaningful role in implementation.

Environmental justice should not be treated as a standalone chapter. It should be a guiding principle that informs every major recommendation in the report.

Targeted Recommendations

In addition to the overarching comments above, we recommend several revisions to strengthen the report's policy direction and ensure that the proposed pathway reflects Minnesota's waste hierarchy and environmental justice goals.

Clarify the Role of Mixed Waste Processing

The report appropriately recognizes that source reduction, reuse, recycling, and organics diversion should form the foundation of Minnesota's resource management system. However, it also contemplates expanded use of mixed waste processing as a means of recovering additional materials.

The Coalition recommends that the final report clearly identify mixed waste processing as a supplemental strategy—not a primary pathway to achieving 90 percent diversion.

Public investment should first maximize source-separated recycling and organics collection, waste prevention, reuse, and repair before investing in facilities designed to recover materials from mixed trash. Mixed waste processing generally produces lower-quality materials, faces significant end-market challenges, and recovers fewer recyclable materials than source-separated systems. As Minnesota implements Packaging EPR, the state should allow those investments to improve collection, material quality, and recycling performance before committing substantial public resources to new mixed waste processing facilities.

Explicitly Exclude Chemical Recycling from Minnesota's Resource Management Strategy

Throughout the report, the MPCA appropriately emphasizes keeping materials in productive use, reducing reliance on disposal, and advancing a circular economy.

Chemical recycling technologies—including pyrolysis, gasification, and other plastic-to-fuel technologies—do not advance those objectives.

Rather than returning discarded plastics to new plastic products at meaningful commercial scale, these technologies primarily convert plastics into fuels or chemical feedstocks that ultimately leave the materials economy. They do not reduce plastic production, do not create a circular materials system, and should not be considered recycling or resource management strategies.

The final report should:

- clearly state that chemical recycling technologies are not recycling;
- exclude these technologies from recycling and diversion accounting;
- avoid relying on them to achieve Minnesota's 90 percent diversion goal; and
- prioritize investments in waste prevention, reuse, redesign, composting, and mechanical recycling systems with demonstrated environmental benefits.

Clarify the Long-Term Role of Waste-to-Energy

The Coalition appreciates that the report moves beyond treating waste-to-energy as a preferred management strategy and recognizes the environmental justice and public health implications associated with combustion. The report also demonstrates that achieving 90 percent diversion

depends on substantially reducing the amount of material requiring disposal through waste prevention, reuse, recycling, and composting.

There is a fundamental conflict between maintaining significant waste-to-energy capacity and achieving Minnesota's goal of more than 90 percent diversion. Incinerators depend on a consistent supply of waste, while a zero waste system depends on preventing, reusing, recycling, and composting that same material. Maintaining significant combustion capacity as Minnesota moves toward 90 percent diversion risks creating continued demand for materials that should instead be eliminated from the waste stream or recovered for higher and better uses.

The final report should therefore more clearly define the long-term role of combustion and residual disposal within Minnesota's resource management system. Consistent with the international zero waste hierarchy, the state's long-term goal should be to minimize disposal by maximizing upstream strategies, with only a small residual waste stream requiring final disposal.

As disposal declines, the final report should identify a clear transition strategy away from incineration while planning for the safe management of remaining residuals. Rather than investing in new or expanded combustion infrastructure, Minnesota should prioritize continued investment in waste prevention, reuse, repair, recycling, and composting while supporting workers and communities affected by this transition, consistent with the just transition principles described below. During this transition, we also urge the MPCA to require incinerators to install continuous monitoring systems for a broader range of pollutants and adopt stricter emissions standards. These measures would increase protections for frontline communities and provide greater access to information about pollution exposures.

The report should also recognize that a small amount of residual material will continue to require disposal. Because landfills represent the final step in the waste hierarchy, the report should recommend modernizing Minnesota's landfill standards to reflect that role. This should include stronger methane capture and emissions requirements, enhanced groundwater and leachate protections, restrictions on the disposal of materials that can reasonably be prevented, reused, recycled, or composted, increased monitoring and public transparency, and siting and permitting decisions that avoid placing additional burdens on environmental justice communities. The report should also address the safe management of existing incinerator ash at dedicated landfills because this material differs from other waste streams in its higher toxicity and greater likelihood of becoming airborne.

By more clearly defining the state's long-term strategy for both combustion and residual disposal, the final report would provide a more complete and credible pathway to achieving Minnesota's zero waste goals.

Plan for a Just Transition to a Zero Waste Economy

Achieving Minnesota's goal of reducing disposal by more than 90 percent will require significant changes in how materials are produced, collected, reused, repaired, recycled, composted, and

ultimately disposed. Those changes will affect workers throughout Minnesota's existing waste system while also creating new workforce needs in reuse, repair, recycling, composting, and other zero waste activities.

The final report should explicitly incorporate a just transition for workers into Minnesota's implementation pathway. As the state reduces its reliance on disposal and combustion, it should identify potential workforce impacts and develop strategies to ensure that workers are not left behind. This should include opportunities for training and retraining, pathways into safe and stable jobs within the emerging zero waste economy, and meaningful participation by affected workers and communities in transition planning.

A successful transition should be measured not only by how much less Minnesota disposes, but also by whether the new systems we build create safe, equitable, and sustaining jobs. Planning for those workforce needs now will help ensure that Minnesota's transition to zero waste benefits both communities and workers.

Establish Measures of Success Beyond Diversion

Finally, the Coalition encourages the MPCA to broaden the way success is measured.

Diversion is an important metric, but a resource management system should also measure whether Minnesota is generating less waste in the first place.

The final report should recommend statewide performance measures for:

- per-capita waste generation;
- waste prevention;
- packaging reduction;
- reuse and repair;
- food waste prevention;
- greenhouse gas reductions; and
- environmental justice outcomes.

These metrics would better reflect the report's emphasis on upstream solutions and provide a more complete picture of Minnesota's progress toward a zero waste economy.

Conclusion

The Draft Resource Management Report represents one of the most comprehensive efforts Minnesota has undertaken to rethink its approach to materials management. It establishes a strong vision grounded in waste prevention, reuse, recycling, composting, and environmental justice.

To fulfill the Legislature's charge, however, the final report should go one step further. It should not only describe the future resource management system Minnesota seeks to build—it should clearly identify the pathway for getting there.

By prioritizing the highest-impact strategies, strengthening implementation planning, and ensuring that environmental justice guides every stage of implementation, the final report can become the blueprint that leads Minnesota to a truly zero waste future.

Thank you for the opportunity to provide comments. We look forward to continuing to work with the MPCA as Minnesota advances this important effort.

The following MN Zero Waste Coalition Partners sign-on in support of these comments:

Beyond Plastics Mankato Area
Bicycle Alliance of Minnesota
Clean Water Action
Coalition for Plastic Reduction
Community Members for Environmental Justice (CMEJ)
CURE
Eureka Recycling
Health Professionals for a Healthy Climate (HPHC)
Mankato Area Zero Waste
Minnesota Center for Environmental Advocacy (MCEA)
Minnesota Environmental Justice Table
Minnesota New Iron and Clean Energy
Mukwa
Native Sun Community Power Development
Northeast Metro Climate Action
Recycling Electronics for Climate Action (RECA)
Sierra Club North Star Chapter
Vadnais Heights Green Team