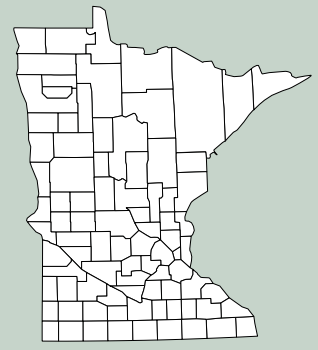


Minnesota

EPR Snapshot for Envelope & Mail Producers



Summary

PRO: Circular Action Alliance (CAA)

Status: Enacted, PRO Registration Underway

Upcoming: Minnesota has contracted a third party to complete the state's needs assessment

Minnesota's EPR law covers packaging, food packaging, and paper products — one of the broadest scopes among enacted states. CAA's initial PRO registration has been accepted. Producers should prepare for eventual PRO participation requirements. Full performance standard implementation does not reach its final phase until January 1, 2032, but engagement should begin now.

What Is Covered

- Packaging materials
- Food packaging
- Paper products — Minnesota's inclusion of paper products is significant for envelope manufacturers

Like Maryland, Minnesota's paper products coverage means that envelope producers should not assume communications mail is automatically excluded. Exemption structures are still being developed.

Practical Takeaways

- Register with CAA as the designated PRO — do not wait for the 2032 performance phase
- Track MPCA rulemaking closely — definitions for 'paper products' coverage are still being refined
- Engage with EMA and AF&PA to ensure the communications mail perspective is represented in Minnesota advisory processes

What to Watch

- MPCA advisory board decisions — these will shape coverage definitions and producer obligations
- CAA reporting and registration timelines for Minnesota
- Whether Minnesota develops exemptions for communications paper similar to Colorado

Key Dates

- CAA's initial PRO registration accepted — producers should join a PRO

- Minnesota Pollution Control Agency (MPCA) in implementation planning and advisory board work
- January 1, 2032 — Full performance standard phase
- Note: The long-term 2032 timeline does not mean there are no near-term obligations — registration and early reporting requirements are active.

Key Resources

- [MPCA EPR Page](#)
- [CAA Producer Resource Center](#)
- [CAA Registration](#)

Practical briefing only; not legal advice. Consult qualified counsel to determine how EPR obligations apply to your specific products and operations. Last updated June 2026.

