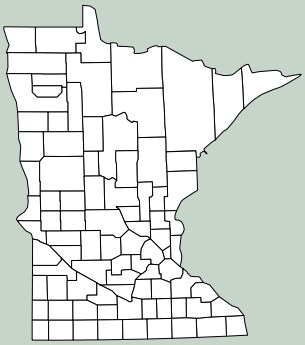
Minnesota

EPR Snapshot for Envelope & Mail Producers



Summary

PRO: Circular Action Alliance (CAA)

Status: Enacted, Building Infastructure.

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. On September 14, 2026, the Minnesota Pollution Control Agency (MPCA) published its highly anticipated draft 2026 Needs Assessment (conducted by Eunomia Research & Consulting). The official 60-day public comment period is open until November 13, 2026. The finalized assessment is legally due by December 31, 2026.

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

- November 13, 2026 - Public comment window closes for the draft 2026 Needs Assessment
- December 31, 2026 - Final 2026 Needs Assessment officially published
- July 1, 2028 - MPCA finalizes statewide curbside collection and alternative collection lists
- October 1, 2028 - CAA must submit its first official 5-year Stewardship Plan to the MPCA
- January 1, 2029 - Mandatory Execution Agreement deadline. Producers cannot introduce covered paper or packaging into Minnesota unless they have a signed funding agreement with CAA
- January 1, 2032 - Full implementation milestone. All covered packaging and paper products must prove they meet strict recyclability, compostability, or reuse metrics to remain in the Minnesota market

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 October 2026.

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