



Minnesota EPR (Packaging Waste and Cost Reduction Act)

Producer Snapshot & Compliance List

As of July 2026.

This summary is provided for information only and is not compliance or legal advice. Please confirm applicability to your specific products and packaging with counsel and regulators.

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Program Overview

Minnesota's Packaging Waste and Cost Reduction Act (PWCRA) is a packaging, paper and foodservice ware EPR program. CAA is the appointed PRO. Producer registration was required by July 2025. 2026 is focused on simplified supply reporting and needs assessment completion, with program launch and fee collection not expected until 2028 at earliest.

PRO	Circular Action Alliance (CAA), appointed PRO
Scope	Packaging, paper products, and foodservice ware
Agency	Minnesota Pollution Control Agency (MPCA)
Funding Model	Partial (but increasing). Producers fund majority of recycling system costs
Current Producer Status	Registration was due July 2025. Simplified supply reporting required by May 31, 2026
Program Fees	Not active. Early fees not expected until 2028 at earliest
Needs Assessment	Draft preliminary assessment completed Nov. 19, 2025. Full needs assessment due Dec. 2026
Rulemaking	MPCA initiated EPR rulemaking activity on May 26, 2026. The rule “will aim to clarify definitions, exemptions, collection lists, statewide requirements and measurement, the stewardship plan and annual reports, and other topics that come up, as time allows. Later steps include informal public engagement, preparation of draft rules and a Statement of Need and Reasonableness (SONAR), and a formal comment period.
Program Plan Due	October 2028

IMPORTANT: Minnesota is pre-program. No fees or dues are being collected. However, registration was required by July 2025 and voluntary simplified supply reporting was due May 31, 2026. Producers who have not registered or who are not prepared to report should act now. CAA's initial registration with the state is expected July 2026.

Where Things Stand (Regulatory Status)

- **Needs Assessment:** MPCA must complete a preliminary assessment in 2025 and a full needs assessment in 2026. Eunomia Research & Consulting completed the draft preliminary assessment Nov. 19, 2025. Full assessment due Dec. 2026.

- **Rulemaking:** MPCA filed a notice of intent on May 15, 2026 and opened a pre-rule comment period on concepts that runs until 4:30 p.m. on July 24, 2026 (no draft rule yet). Expected rules would settle definitions, exemptions, collection lists, statewide requirements and measurement, the stewardship plan, and annual reports; the covered-material list is still being built.
- **Producer Registration:** Was required by July 2025. Producers should confirm they are registered via the CAA Producer Portal.
- **Producer Reporting:** Voluntary Simplified Supply Report (material class level) due May 31, 2026. CAA will use this data for program planning. Portal opened March 31, 2026.
- **CAA Initial Registration:** With MPCA expected July 2026.
- **Program Plan:** Due October 2028. Program fees will not begin until the plan is approved (2028 earliest).

2026 Key Operational Milestones

Date	Milestone	Producer Action
March 31, 2026	Producer Portal opens for Simplified Supply Reporting	Verify portal access; compile CY2025 Minnesota supply data at material class level
May 31, 2026	Voluntary Simplified Supply Report	File via Producer Portal. Data supports CAA program planning
July 2026	CAA initial registration with MPCA expected	No direct producer action required
December 2026	Full needs assessment DUE from MPCA	Review findings for implications on covered materials and program design
~January 2027	MPCA rulemaking expected to begin (after needs assessment)	Monitor rule packages; participate in comment periods as appropriate
October 2028	CAA Program Plan DUE to MPCA	Plan approval triggers fee schedule and producer obligations

Key Watchouts for Personal Care Producers

Watchout	
Not yet a fee-bearing program	Minnesota remains pre-program. Producers should not expect fees in 2026 or 2027 but should be positioned to register and report on time.
Simplified reporting is easier than annual	Material class level reporting (rather than granular category-level) reduces the data burden for this year. Take advantage of the simpler reporting window.
Registration was already due	July 2025 was the statutory registration deadline. Non-registered producers face elevated risk as MPCA formalizes enforcement.
Covered material category list in development	CAA and MPCA are still finalizing the covered material categories. Reporting methodology may evolve before the full program launches.
Fee structure TBD	Fee methodology will follow the program plan. No illustrative rates are available. Budget planning for Minnesota should remain a placeholder for 2028+.

Resources

- [Minnesota packaging EPR page](#)
- [Minnesota statute \(115A.1451\)](#)
- [HF 3911 bill text](#)
- [CAA Minnesota PRO confirmation](#)
- [CAA Producer Resource Center](#)
- [MPCA rule-concepts comment portal \(open through July 24, 2026\)](#)

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