

Minnesota's EPR Law Now in Effect: Businesses Must Confirm Compliance Following July 1 Deadline

Legal Alert
July 9, 2025

Businesses manufacturing, distributing or selling packaging, paper products and food packaging in Minnesota must comply with Minnesota's Extended Producer Responsibility (EPR) laws. Affected businesses were required to register with the Circular Action Alliance (Minnesota's only approved Producer Responsibility Organization (PRO)) by **July 1**. Failure to comply could result in severe financial penalties (\$25,000 per day for initial violations, \$50,000 for a second violation within 5 years and \$100,000 for subsequent violations). Businesses must carefully evaluate the applicability of Minnesota's EPR law to their operations in order to ensure timely compliance.

Minnesota's EPR program places financial responsibility for the recycling and disposal of covered products on producers. Producers include brand owners, manufacturers, importers and retailers of covered products. The program is aimed at reducing the environmental and human health impacts of packaging materials by reducing the generation of covered materials waste.

Recommended Actions

Given the recent deadline to begin compliance, businesses should be:

- Evaluating whether their products and operations are subject to Minnesota's EPR laws;
- Registering with the CAA, if applicable;
- Developing ongoing compliance strategies to mitigate the risk of penalties and ensure alignment with evolving EPR requirements.

Contact

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Looking Ahead

The attorneys at Foster Garvey will continue to monitor legislative developments and regulatory announcements affecting producer responsibility laws nationwide. For assistance with compliance assessments or preparation strategies, please contact Foster Garvey.