

September 16, 2025

RE: Docket #24-352

Dear Commissioners,

At Eureka Recycling, we are committed to advancing solutions that protect community health and the environment. As recyclers, we see firsthand how decisions about energy and waste shape the air we breathe, the neighborhoods we live in, and the resources we depend on. From that perspective, we urge the Commission to uphold the plain language of the 100% Carbon Free Standard Law as it is written: carbon free means “a technology that generates electricity without emitting carbon dioxide”.

The Commission should reject the use of comparative or lifecycle analysis to justify including technologies that emit carbon dioxide and other pollutants that contaminate our air, ground, and bodies. There is no need to complicate and hold back Minnesota’s movement toward a carbon free future.

Burning is Not a Climate Solution

Trash and biomass incineration are not carbon free.

Burning garbage releases greenhouse gases and harmful pollutants linked to asthma, heart disease, and other serious health conditions. It also undermines upstream waste reduction efforts by creating demand for a steady waste stream, making it harder to expand reuse, repair, composting, and recycling infrastructure. This also directly contradicts Minnesota’s waste management hierarchy and the statutory goal of diverting 75% of metro-area waste from disposal.

Biomass combustion emits carbon dioxide at rates that can exceed those of coal and generates toxic byproducts requiring further disposal. These facilities, like trash incinerators, are disproportionately located in low-income neighborhoods and communities of color. Including them in the standard would undercut Minnesota’s environmental justice commitments and further entrench systems that are already causing harm.

Carbon Capture Doesn’t Meet the Standard

Carbon capture shouldn’t qualify either. No system captures 100% of emissions, and running these systems can require significant energy – often from fossil fuels. This approach props up fossil fuel and carbon infrastructure rather than replacing it, delaying the transition to truly clean energy. It’s a false solution that doesn’t meet the plain language of the law.

Invest in What's Proven and Clean

Minnesota doesn't need to settle for marginal or polluting technologies. We already have real solutions: wind, solar, battery storage, and distributed energy systems. These options reduce emissions, protect public health, and create space for community ownership.

We urge the Commission to uphold the 100% Carbon Free Standard with integrity and clarity - and to reject false solutions that would weaken Minnesota's clean energy future.

We are happy to discuss any of the above recommendations. Please reach out to Joshua Toor at joshuat@eurekarecycling.org.

Thank You,

A handwritten signature in black ink, appearing to read "Joshua Toor", with a stylized flourish at the end.

Joshua Toor

Policy and Advocacy Manager

Eureka Recycling