

May 15th, 2025

Commissioner Katrina Kessler
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

Dear Commissioner Kessler,

The Partnership on Waste and Energy (Partnership) is a Joint Powers Board consisting of Hennepin, Ramsey and Washington counties, formed to address waste management and energy issues. The Partnership seeks to end waste, promote renewable energy and enhance the health and resiliency of the communities we serve while advancing equity and responding to the challenges of a changing climate.

The Partnership strongly supported product stewardship for boat wrap during the 2024 legislative session and is proud Minnesota is the first state to establish such a program. The Partnership also recognizes the challenges that come in managing the materials generated. The Minnesota Boat Wrap Stewardship Plan (Plan) developed by the Commercial and Industrial Flexible Film Recycling Organization (CIFFRO) is a good start, but the Partnership would like to share some concerns with the plan. Primarily, the Partnership would like to see:

- A better delineation of collection sites and development of an adequate network of sites such as:
 - Identifying how CIFFRO will determine what locations generate the highest tonnage of boat wrap, especially if those locations do not participate in the program, and how a lack of site participation in the collection program will be addressed.
 - Addressing the convenience element and establishing an understanding of what it would take to satisfy this requirement?
 - Identifying how many current collection sites exist, how many of those are on the list in Section 5.b. presented as entities potentially interested in operating as a collection site, and how many others are known to be involved in the removal of boat wrap but have not yet expressed interest.
- Stronger clarification of the funding model, including specifics on reimbursements, incentives or other assistance for partners that may be needed to address material handling costs, make infrastructure or other operational changes and otherwise encourage a site to participate.

The Partnership appreciates the opportunity to provide comments on the draft stewardship plan presented to the Minnesota Pollution Control Agency (MPCA). In addition to this letter, the Partnership will be submitting an attachment with detailed comments for individual sections. We stand ready to work with the MPCA and other partners to implement this program and reduce the amount of waste headed to landfills and waste-to-energy facilities in Minnesota.

Sincerely,



Commissioner Fran Miron, Washington County
Chair, Partnership on Waste and Energy

Attachment: PWE Comments to MPCA on Boat Wrap Attachment 1