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Please take the time to review the attached PDF.

If the intent is to enforce plastic recycling in this manner, please step back and consider the broader implications of this issue. Implementing such enforcement would be nearly impossible in practice and would create unmanageable burden on the agency, the consumer and the taxpayers of Minnesota.

Comprehensive Analysis: Challenges, Economic Burdens, and Policy Alternatives for LDPE Boat Wrap in Minnesota

Economic Burden of Mandating Boat Wrap Recycling in Minnesota

As Minnesota considers a mandate for the recycling of low-density polyethylene (LDPE) boat wrap, it is essential to understand the substantial economic burden such a policy could place on various stakeholders. While the environmental goals are commendable, the logistical and financial realities present a range of challenges that could undermine the effectiveness and fairness of the mandate.

1. High Costs of Collection and Transport

Boat wrap is bulky and lightweight, making it inefficient and costly to transport. It requires significant space in hauling vehicles but has little value by weight. Stakeholders—including marinas, haulers, and private boat owners—may need to invest in specialized equipment like balers or compactors just to make wrap viable for shipment. Without state subsidies or market incentives, the cost per ton to recycle LDPE wrap often exceeds that of landfill disposal.

2. Limited Local Processing Infrastructure

Minnesota has few facilities capable of processing LDPE, and those that do generally prefer clean, baled film. Boat wrap, which may be dirty or contaminated, often cannot be handled locally. As a result, much of the material must be transported out of state, which significantly increases logistics costs and carbon emissions. Developing in-state infrastructure would require significant capital investment, currently unallocated.

3. Preprocessing Challenges and Contamination

Boat wrap is frequently contaminated with dirt, mildew, shrink residues, or labels due to outdoor exposure. These contaminants reduce its recyclability and require labor-intensive cleaning, increasing costs. Many recyclers will reject such materials or charge extra, making it economically unfeasible without preprocessing support.

4. Low Market Value of Recycled LDPE

The market value of recycled LDPE is low and volatile, typically ranging from \$100 to \$300 per ton—well below the cost to collect, clean, and transport it. Compared to more valuable recyclables like PET or HDPE, LDPE is a low-priority material for processors, often resulting in a financial loss for those attempting to recycle it.

5. Disproportionate Impact on Small Businesses

Small marinas, local haulers, and independent installers would bear most of the compliance burden. These businesses operate on thin profit margins and could face increased costs related to equipment, labor, storage, and transport. Many would be forced to raise prices or cease operations, affecting consumers and local economies.

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6. Enforcement and Administrative Costs

Implementing a mandate would require a statewide enforcement system to track wrap sales, usage, and end-of-life handling. This would demand substantial state investment in staffing, monitoring, and compliance efforts—costs likely borne by taxpayers. The administrative burden could be disproportionate to the environmental benefit if participation is inconsistent.

7. Market Distortion and Cross-Border Sales

If Minnesota alone mandates boat wrap recycling, dealers and consumers may shift purchases to nearby states like Wisconsin or Iowa, where regulations are less strict. This undermines in-state compliance, reduces taxable sales, and fails to achieve environmental goals.

8. Low Participation Among Private Users

Private boat owners who store vessels on their own property are less likely to comply with a mandate, especially if it involves cost, inconvenience, or legal ambiguity. These users are difficult to monitor and regulate, resulting in uneven enforcement and limited environmental impact.

Policy Alternatives: Ban or Tax

Option 1: Ban the Use of Boat Wrap

A ban on boat wrap would directly eliminate the environmental and economic challenges associated with its disposal and recycling. This would encourage the development of alternative, eco-friendly boat coverings without burdening businesses with costly compliance requirements.

Option 2: State Tax on Boat Wrap and Services

Implementing a state tax on boat wrap and all associated services (including installation) would:

- **Increase the cost of boat wrap**, leading to less usage and encouraging alternative, more sustainable materials.
- **Provide state revenue** that could be used to fund recycling infrastructure or programs that promote the development of eco-friendly boat coverings.
- **Simplify enforcement** by focusing on sales rather than post-consumer behavior, creating a more streamlined and equitable policy.

Conclusion:

While the goal of reducing plastic waste is important, mandating boat wrap recycling without adequate support creates significant economic burdens that spirals down a path without success. A state tax on boat wrap would serve as a more effective disincentive, reduce the economic burden on businesses, and generate funds to build budgets to produce alternative solutions. This approach would be more economically feasible and could result in greater environmental impact than a recycling mandate.