

Melissa Finnegan

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

The Partnership on Waste and Energy (Partnership) submits the following detailed comments in addition to our letter submitted May 15, 2025:

#### Section: Definitions

- Additional definitions may be needed, such as collection site/location, types of plastic used for boat winterization (wrap vs shrink) and any other definitions relevant to conveying the meaning and intent of the law.

#### Section 1: Stewardship Organization Plan Elements

- The use of “Submitted on behalf” does not make a clear connection to CIFFRO.
- The Plan should describe the efforts of CIFFRO to identify producers to solicit to join CIFFRO, both before the 9/1/25 deadline for compliance and after, not just relying on MPCA enforcement.
- The Plan should provide dates and a time frame for non-profit formation.

#### Section 3: Boat Wrap Collection Methods

- The Plan identifies the focus for 2025-2026 will be on existing or previously operational sites. Although this approach makes sense in the short term, there should be more in the Plan to identify ways that CIFFRO will use this information in real time and target large volume sites. Additionally, the plan should identify any data on boat storage and wrap removal at marinas or other centralized locations vs. home storage and wrap removal.
- The Plan needs specifics on how collection of materials will be efficient while also minimizing contamination.
- The Plan should identify how CIFFRO will gain information on tons collected outside CIFFRO’s collections system to assess the adequacy of the collection system.

#### Section 4: Program Performance Measurement, Monitoring and Maintenance

- The Plan should clarify if “diversion rate” is meant to represent material captured in the program’s recycling collection system compared to material disposed of or if it is

a comprehensive measure that includes material rejected by recyclers and disposed.

- The Plan should identify if effectiveness of education campaigns on recycling is measured in terms of awareness of recycling opportunities, awareness of how to prepare wrap, and how effectiveness of education leads to program participation.
- The Partnership recognizes this section is being finalized, but elements of the Plan can be defined for greater transparency, e.g., criteria for selecting collection receptacles was not mentioned but could include expected volume and space availability. This section rightly emphasizes efficiency, which may be at odds with convenience and adequacy of statewide coverage. CIFFRO's interpretation of these terms and balancing goals with collection partners needs inclusion.

#### Section 5: Collector, Transporter, Reuse Facility and Recycler Names

- The Plan section includes no discussion of reuse as required in the citation of Subd. 5 (5).

#### Section 6: Description of Boat Wrap and Residual Handling, Transport and Tracking Procedures

- The Plan should identify what recyclers accept as there is variability in what is accepted (color, residual sediment, accessories, etc.). CIFFRO's stakeholder convening efforts can incorporate discussions to identify the most recyclable products for local markets.
- The Plan does not indicate the current number of service providers who are certified for this work or plans to bring on additional providers should there be a need.

#### Section 7: Methods Used to Recycle Boat Wrap and Nonrecyclable Materials

- The Plan should identify the comparison of the percent of purchased/used wrap to what is recycled.

#### Section 8: Promotion and Outreach Activities

## PWE Comments to MPCA on Boat Wrap Attachment 1 – May 15, 2025

- The Plan outreach efforts are directed more publicly. It should be identified more specifically how promotions and outreach will be conducted to the public vs. the commercial sector. CIFFRO should consider working with a media company specific to outreach and work with partners that are close to the boating industry.
- The Plan should define what constitutes the "need" for an additional collection point and how the data/information will be collected to inform that designation.
- The educational plan could start in fall 2025, when boat wrapping is beginning, to increase exposure to the program. The educational plan should also identify any known opportunities for reusable wrap options.

### Section 9: Annual Performance Goals

- The Plan recognizes the need to work with the MPCA Commissioner to develop performance goals but should have an indication of how data collection in other areas will be used to develop performance measures or make plan adjustments.

### Section 11: End Markets

- The Plan should specify what “multiple recyclers” means, what capacity is currently available and what future capacity would be available or the extent it could limit growth of the program if not developed.

### Stakeholder Consultation

- The Plan indicates CIFFRO conducted outreach to 300+ stakeholders but conducted and responded to outreach are two separate things. The Plan should specify the number of responses and where these came from in an additional figure.
- The Plan could better specify the list of stakeholder size. For instance, how many boat owners, how many marinas of “X” size, how many wrap producers and distributors, how many companies providing wrapping services, etc.

### Miscellaneous Comments

PWE Comments to MPCA on Boat Wrap Attachment 1 – May 15, 2025

- Page 3: The use of “and or” in the second paragraph--it is not clear if this is a typo or if “and/or” is intended.
- Recommend edit(s): Where the Plan states “landfills,” edit to include some form of “landfill and waste-to-energy facilities.”