



May 14, 2025

**Minnesota Pollution Control Agency**  
Attn: Commissioner Katrina Kessler  
520 Lafayette Rd N  
St. Paul, MN 55155

**RE: Comments on Minnesota Boat Wrap Stewardship Plan Submitted by CIFFRO**

Dear Commissioner Kessler,

On behalf of the National Marine Manufacturers Association (NMMA), we appreciate the opportunity to provide formal comments on the Draft Boat Wrap Stewardship Plan submitted by the Commercial and Industrial Flexible Film Recycling Organization (CIFFRO), in accordance with Minn. Stat. § 115A.1146. We value the collaborative approach taken to develop this plan and are grateful for the chance to contribute to the ongoing discussion.

The National Marine Manufacturers Association (NMMA) represents North America's recreational boating industry, with member companies producing over 80% of the boats, engines, trailers, accessories, and related gear used by boaters across the U.S. and Canada. In Minnesota, where boating is not only a popular pastime but a key economic driver, the industry supports more than 25,000 jobs and generates an annual economic impact of \$6.9 billion. With the state ranking second nationally in per capita boat registrations, Minnesota is home to dozens of small, family-owned marine businesses that are vital to the sector's success.

NMMA supports the intent of the legislation to reduce waste and enhance the recycling of single-use boat shrink wrap. However, for the Boat Wrap Stewardship Program to succeed and align with legislative goals, it must be inclusive, flexible, and economically viable, particularly for Minnesota's small, family-owned recreational marine businesses. To ensure the program is both environmentally effective and operationally feasible, we offer the following recommendations.

**1. Expand Producer Participation**

The current Stewardship Organization includes only two producers—Dr. Shrink and Husky Marine, which fails to adequately represent the full spectrum of boat wrap suppliers in the United

States. This limited participation risks undermining the program's effectiveness, especially in reaching smaller marinas, rural operations, and independent contractors. To achieve meaningful statewide coverage and compliance, CFFRO and the MPCA must significantly expand outreach to a broader array of manufacturers and distributors.

In addition, NMMA recommends establishing a grace period through January 1, 2026, allowing producers time to join the program voluntarily before enforcement actions are taken. Prioritizing education and collaboration over penalties during the initial rollout will increase compliance, promote fairness, and set the stage for long-term success.

## **2. Clarify Scope of Applicability**

To ensure clarity and prevent unintended consequences, it's essential that the final legislation explicitly states that it applies solely to single-use, low-grade plastic boat shrink wrap. This distinction is crucial to align with the legislative intent expressed during committee discussions and to protect businesses and boat owners who have already invested in sustainable storage alternatives.

While single use shrink wrap is commonly used for winterizing boats, it poses significant environmental challenges due to its disposal after a single use. In contrast, reusable or high-grade multi-use covers, such as canvas or custom-fit tarps, are designed for extended use and are more durable and eco-friendly. These alternatives help reduce the frequency of plastic waste and the associated environmental impact.

By clearly defining the scope of the legislation to exclude reusable or high-grade covers, the law can effectively target the reduction of single-use plastic waste without penalizing those who have adopted more sustainable practices. This approach supports the broader goal of minimizing plastic pollution while recognizing and encouraging environmentally responsible choices among boat owners and businesses.

## **3. Address Operational Challenges in Collection**

To create an effective and realistic recycling plan, it is critical to address the operational challenges associated with marine shrink wrap use in Minnesota. The current draft plan's requirement that shrink wrap be "clean and free of non-LDPE" does not reflect the realities faced by marine businesses. Boat wrap is often stored outdoors through harsh winters, where it accumulates dirt, ice, and debris—making it difficult to meet cleanliness standards. This added burden falls during spring commissioning, a time when businesses are already operating at full capacity.

While Section 3 of the Draft Plan provides flexible collection options, the actual process of removing, cleaning, and sorting wrap remains labor-intensive. Small marine manufacturers, retailers, marinas, and storage yards frequently lack the necessary staff, equipment, and storage space to manage these tasks efficiently. Without adjustments to the requirements or additional

support, these businesses may face increased operational costs—costs likely to be passed on to consumers—and many will be discouraged from serving as collection sites altogether.

#### **4. Provide Financial Support for Collection Sites**

For the recycling program to succeed, it must include financial support for marine businesses serving as collection points. Without compensation for the additional labor, storage, and equipment required to remove, clean, and prepare shrink wrap, small businesses will face unsustainable cost burdens. These expenses would likely be passed on to consumers, directly undermining the program’s goal of offering free and convenient collection—and potentially violating **Minn. Stat. § 115A.1416 Subd. 14**, which prohibits imposing fees on non-producers.

We urge CIFFRO and the MPCA to amend the plan to provide direct funding or reimbursement for collection site labor and logistics, or to reassign preparation responsibilities to processors or consolidation facilities better equipped to manage them. At minimum, marine businesses should be exempt from requirements to remove non-LDPE or deliver “clean” wrap. Without these changes, the burden on small operators will be excessive, and the NMMA cannot responsibly recommend that businesses participate as collection sites.

#### **5. Anticipate and Prevent Illegal Cost Shifting**

Minnesota marine businesses are increasingly concerned that boat wrap producers may raise prices to cover their costs of participating in the Stewardship Organization. Such actions would represent an **unlawful transfer of program expenses** to non-producers, in direct violation of **Minn. Stat. § 115A.1416, Subd. 14**.

Under the statute, marine manufacturers, retailers, marinas, and storage facilities are not considered “producers,” and therefore cannot legally be burdened with program-related costs. Any price increases passed down to these businesses would therefore be noncompliant.

#### **6. Amend the Collector Role or Offer Exemptions**

Instead of placing the burden of cleaning and sorting shrink wrap on small marine businesses, CIFFRO should revise its requirements for collectors or exempt Minnesota’s seasonal marine operations from this responsibility entirely. The **proposed Standard Operating Procedure (SOP)** assumes a level of staffing and operational capacity that simply does not exist within these labor-limited, short-season businesses.

Shifting these responsibilities to the smallest businesses in the supply chain doesn’t reduce labor costs; it simply shifts the burden to those least able to absorb it. Many of these businesses already operate on thin margins and within limited seasonal windows. Adding extra duties during their peak season risks not only their participation but also the overall success of the program.

Despite the concerns raised, NMMA remains committed to working collaboratively with CIFFRO, MPCA, and other stakeholders to develop a practical, balanced, and effective Boat

Wrap Stewardship Program. With targeted adjustments—such as realistic expectations for collection sites, clear producer responsibility, and financial support for small businesses, Minnesota has the opportunity to lead in sustainable plastic stewardship within the recreational boating industry. We are dedicated to ensuring that the final plan addresses the practical needs of marine businesses, aligns with the state’s environmental goals, and promotes a fair and effective recycling program. Thank you for considering our input, and we look forward to continued dialogue as the program progresses.

Sincerely,

Jesse McArdell

A handwritten signature in cursive script that reads "Jesse McArdell". The signature is written in dark ink on a light-colored, slightly textured background.

Senior Manager of Midwest  
Government Relations  
National Marine Manufacturers  
Association