

Minnesota Boat Wrap Stewardship Plan

March 1, 2025

Presented to

Commissioner Katrina Kessler

Minnesota Pollution Control Agency

By

The Commercial and Industrial Flexible Film Recycling Organization

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Introduction

The Commercial and Industrial Flexible Film Recycling Organization (CIFFRO) is pleased to submit this Minnesota Boat Wrap Stewardship Plan (Plan) for approval to the Minnesota Pollution Control Agency (MPCA) Commissioner pursuant to the requirements of Minn. Stat. § 115A.1146 (the “Law”) for management of discarded boat wrap. The Plan is intended to cover a period of five years commencing six months after approval is granted by the Commissioner.

The Plan describes how CIFFRO, a newly formed Stewardship Organization comprised of boat wrap producers as defined under the Law, intends to comply with the Law by financing and implementing a statewide Boat Wrap Stewardship Program (Program) for discarded boat wrap. The Program is structured to provide convenient and free collection, transportation, recycling, reuse and or disposal of boat wrap for all Minnesota boat owners, marinas, boat storage facilities and other Program collection partners.

The Program will be funded by annual Stewardship Organization membership dues paid by boat wrap producers who have entered into a participation agreement with CIFFRO.

Effective September 1, 2025, a boat wrap producer may not sell boat wrap or offer boat wrap for sale in or into Minnesota unless the producer participates in an approved Stewardship Plan through a Stewardship Organization.

CIFFRO will work with the Commissioner to establish annual Program performance goals and submit an annual report to the Commissioner describing Program operations and performance during the previous calendar year starting March 1, 2026. The report will include all reporting criteria as required by the Law.

Once determined by MPCA, CIFFRO will pay an annual administrative fee to the Commissioner starting July 1, 2025.

In accordance with the Law, CIFFRO consulted with stakeholders affected by the Law to develop the Plan. Details are provided in the Stakeholder Consultation section of this Plan below.

Definitions

Definitions of language cited in the law and used throughout this Plan are below:

Boat has the meaning given to watercraft under section [86B.005, subdivision 18](#).

Boat wrap means plastic that is used, intended for use, designed, or marketed for the purposes of wrapping a boat to protect it against moisture and damage from other potentially harmful elements during storage.

Brand means a name, symbol, word, or mark that identifies boat wrap and attributes it to the boat wrap producer.

Independent auditor means an independent and actively licensed certified public accountant that is:

- retained by a stewardship organization;
- not otherwise employed by or affiliated with the stewardship organization; and
- qualified to conduct the audit required under subdivision 16 of the Law.

Producer means, with respect to boat wrap that is sold, offered for sale, imported, or distributed in the state by any means, a person that:

- manufactured the boat wrap under a brand that the person owns or controls;
- owns or controls or is licensed to use a brand for boat wrap;
- imported or imports the boat wrap into the United States; or
- distributed or distributes boat wrap in or into the state.

Recycle or recycling means the process of transforming boat wrap through mechanical processes into a finished product for use or into a new material capable of being processed into a finished product. Recycle or recycling does not include:

- altering the chemical structure of boat wrap;
- using boat wrap as, or processing boat wrap, into a feedstock to produce transportation fuels; or
- destroying boat wrap by incineration or other processes.

Retailer means a person that sells or offers boat wrap for sale in or into this state by any means.

Stewardship organization means an organization designated by one or more producers to act on their behalf as an agent to design, submit, and implement a product stewardship plan under the Law.

Stewardship Organization Plan Elements

Minnesota Statute 115A.1416 Subdivision 5 describes the content required for the Boat Wrap Product Stewardship Plan to be submitted by the Stewardship Organization. The required elements are broken out into eleven sections below, each section is prefaced by a text box with the actual statute text as point of reference.

As it is likely that implementation of the Plan will not begin until mid-to late 2025, CIFFRO anticipates the components of the Plan taking place in 2025 will focus on ramping up collections and preparing public education materials for a successful collection period during the high season of boat wrap disposal occurring in Spring 2026 (Program Year 1). It is anticipated that dialogue with MPCA will be continuous and open during the development and implementation phases of the Plan.

Please note, reference to Program Year 1 in the Plan is to calendar year 2026, Program Year 2 is to calendar year 2027 and so forth.

Plan Content Requirement: A stewardship plan must contain:

Subd. 5. (1) contact information for the individual and the entity submitting the plan, a list of all producers participating in the product stewardship program, and the brands of boat wrap included in the product stewardship program;

1. Stewardship Organization and Participating Brands

a. Stewardship Organization Contact Information

CIFFRO is a Stewardship Organization formed to plan, implement, manage and finance a Minnesota Boat Wrap Stewardship Plan (Plan) on behalf of boat wrap producers affected by the Law. CIFFRO was incorporated as a company in 2025 and is in the process of preparing its application for submittal to the IRS to become a non-profit organization.

This plan was developed with the assistance of Reverse Logistics Group and is being submitted on behalf of CIFFRO by:

Kelsey Pigneri
Vice President HR/Compliance
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b. Producers Participating in the Program and Associated Brands

Producers selling, distributing or importing boat wrap in or into Minnesota are required under Law to become a member of a Stewardship Organization and participate in a Plan. Stewardship Organization members will be required to annually report data on product sales by product type and volume and pay associated fees to CIFFRO based on market share determination. Fees collected by CIFFRO will be used to support implementation, ongoing management, and administration of the Plan described herein.

Producers that have joined CIFFRO and will be participating in the proposed Plan are:

- Poly-America, L.P.
 - Brand: Husky Marine
- Dr. Shrink
 - Brand: Dr. Shrink

It is anticipated that additional producers will join CIFFRO in the coming months because participating in a Stewardship Organization is a requirement to continue selling, distributing or importing boat wrap in or into Minnesota effective September 1, 2025. It is requested that MPCA will utilize available enforcement actions to pursue non-compliant obligated producers.

Plan Content Requirement: A stewardship plan must contain:

Subd. 5. (2) certification that the product stewardship program will accept all discarded boat wrap regardless of who produced it;

2. Stewardship Organization Certification of Material Acceptance

- a. CIFFRO certifies that collection sites and collectors operating as part of the CIFFRO managed Program will accept all discarded boat wrap regardless of which entity produced it. All boat wrap accepted by Program collection sites

or collector partners must have been used and discarded in the State of Minnesota.

Plan Content Requirement: A stewardship plan must contain:

Subd. 5. (3) a description of methods by which boat wrap will be collected in all areas of the state in compliance with subdivision 14, including:

(i) an explanation of how the collection system will be convenient and adequate to serve the needs of boat owners, marinas, and boat storage establishments in both urban and rural areas on an ongoing basis; and

(ii) a discussion of how existing marinas, boat storage establishments, and sites designated as recycling centers under section [115A.555](#) will be considered when selecting collection sites;

3. Boat Wrap Collection Methods

- a. Initial consultation with multiple boat wrap collection programs across the country and within Minnesota have indicated that there are several possible logistical approaches to collecting boat wrap within the state. These approaches include but are not limited to:
 - i. Consolidation in palletized gaylords
 - ii. Loose collection in a storage container or trailer
 - iii. Collection via large recyclable bags
 - iv. Use of open top dumpsters with compaction as an option
 - v. Shared storage and shipping between multiple businesses to send material to a recycler in semi-trailers.

CIFFRO intends to improve collection methods during the implementation of this Program in 2025 and 2026 by taking a multi-pronged operational approach focusing on existing or previously operational sites in Minnesota. CIFFRO will support private businesses that currently remove the material on behalf of the boat owner, as well as local government collection programs open to residents. This initial approach includes working with currently operational collection programs operated by marinas, boat storage establishments, and sites designated as recycling centers. These entities understand the challenges of collecting boat wrap for recycling, especially within their own communities.

CIFFRO will provide a convenient and adequate collection system using multiple operational approaches.

First, existing public and private collection sites that are willing to operate under this Program will be evaluated for their efficiency. The consultations conducted during the plan writing period resulted in valuable feedback regarding operational successes currently existing in Minnesota, and CIFFRO intends to support and uplift those sites to encourage higher collections and evaluate the ease of collection and transportation to recyclers throughout Year 1 of implementation.

Second, CIFFRO will work to recruit new collection locations at marinas, boat storage facilities, and/or sites designated as recycling centers based on ongoing stakeholder feedback – if a site is willing to join the collection network and abide by the Program guidelines, then they will be included.

Third, multiple pilot programs will be launched with new or existing collection partners to evaluate operational efficiencies based on the various operational approaches taken across the state and country to collect boat wrap. The implementation of pilot programs will be dependent on the received requirements of Program recyclers processing the material and the consolidation capacity of collection points. The results of these pilots will determine if the approach can be scaled to additional designated collection sites.

Potential pilot projects may include:

- i. *Potential Pilot 1:* The utilization of a plastics baler at larger collection points or a consolidation point to minimize logistics costs and save space.
- ii. *Potential pilot 2:* The utilization of temporary storage containers (i.e. sea containers) to securely consolidate material via palletized gaylords at locations that do not have indoor storage available.
- iii. *Potential pilot 3:* The utilization of open-top dumpsters and mobile compacting services to minimize logistics cost and save space.
- iv. *Potential pilot 4:* The utilization of large plastic bags to consolidate small quantities of material with the aim of decreasing contamination.

Finally, plastics recyclers consulted during the Plan development phase informed CIFFRO that to ensure high recycling rates, collection points must ensure that all non-polyethylene materials added to boat wrap at the point of application to the boat including nylon tape, metal grommets, zippers, and

rope is cut out of the boat wrap. Additionally, the boat wrap should be kept free of dirt and sand. The ability for a recycler to accept boat wrap containing residual sediment or consisting of multiple colors varies between recyclers.

- b. Given that there is no statewide baseline tonnage data regarding boat wrap collections in Minnesota, CIFFRO will work to establish a system that is continuously tracking the tonnage collected on a site-by-site basis and any contamination issues reported by recyclers. An annual survey of collection sites will be sent for feedback. During Program Year 1 of implementation, the goal is to determine the following:
 - i. Communities that generate the highest tonnage of boat wrap
 - ii. Communities that need additional collection points
 - iii. Communities that need additional education and/or training to improve the quality of wrap received at recyclers
 - iv. Communities that need additional education and/or training to efficiently pack the material for shipment
 - v. Operational approaches that result in the highest tonnage, cleanest material, and lowest complaints
 - vi. Communities that would benefit from on-call services to collect during a certain time of year rather than year-round storage of material
- c. Once the findings described in Section b. above are captured during Program Year 1 implementation, CIFFRO will be able to better address any shortcomings in the existing Program, with a focus on ensuring convenient and adequate collections for boat owners, marinas, and boat storage establishments in both urban and rural areas on an ongoing basis. In addition to operational data collection, annual surveys will also be used to collect feedback regarding the effectiveness of the program from collection sites.
- d. In Program Year 2 the focus will be on improving the collection program based on learnings from Program Year 1, with the goal that Program Year 3 will have a firmly established Program that provides the convenience needed by boat owners, marinas, and boat storage establishments. It is expected that this Program will continuously evolve based on annual evaluations of operational efficiency and open dialogue with stakeholders. The operational approach will pivot as needed to provide the best possible collection program that is customized to each collection site and ultimately meet annual performance goals, 2030 performance goals, and 2035 performance goals established under the Law.

Plan Content Requirement: A stewardship plan must contain:

Subd. 5. (4) a description of how the performance of the collection and recycling program will be measured, monitored, and maintained;

4. Program Performance Measurement, Monitoring and Maintenance

a. **2025 and 2026**

Based on the current lack of a robust or coordinated boat wrap collection network in Minnesota and availability of associated recycling rate data, it is anticipated that continued outreach throughout 2025 and 2026 will be required to develop a convenient statewide collection infrastructure.

Ongoing discovery based on surveys and interviews by CIFFRO are necessary to determine what current collection and recycling infrastructure exists in the state, what types of collection may work best in certain locations or regions moving forward and what contractual requirements are necessary to engage and build partnerships with existing and new collection site partners.

The Program will be measured in Program Year 1 on the following metrics. Please note some of these metrics may be reported as qualitative or quantitative:

i. Environmental

- a. Diversion rate: percentage of boat wrap that is diverted from landfills through recycling or reuse.
- b. Contamination rate: percentage of non-recyclable materials in the collection stream

ii. Operational

- a. Collection efficiency: tonnage collected per trip
- b. Collection Access: number of collection opportunities compared to the prior Program Year
- c. Recycling rate: percent of boat wrap collected that is recycled

iii. Social

- a. Public awareness: effectiveness of public education campaigns on recycling
- b. Identification of underserved areas: areas requiring additional collections to be adequately serviced

b. 2027 and Onward

It is anticipated that CIFFRO will use the same metrics as established for Program Year 1 plus any other metrics pertaining to annual performance goals that are established in collaboration with MPCA for 2027 and onward. Annual program evaluation will be performed as described above in Section a., this will also help to determine if new metrics should be tracked moving forward.

Plan Content Requirement: A stewardship plan must contain:

Subd. 5. (5) the names and locations of collectors, transporters, reuse facilities, and recyclers that will manage discarded boat wrap;

5. Collector, Transporter, Reuse Facility and Recycler Names

- a. Through the stakeholder consultation in early 2025, CIFFRO connected with many existing public and private boat wrap collectors and collection sites. Given the expedited Program implementation timeline stated in the Law, recruiting new and existing collection sites to operate under the Program is an ongoing effort.

As part of the stakeholder consultation, CIFFRO sent out a stakeholder survey to more than 300 entities to determine which public or private entities would be willing to operate as collection sites or act in the capacity of a boat wrap transporter or recycler. The surveys were sent out in late February. We anticipate collection sites and partners currently offering boat wrap collection, transportation and recycling services within the state will want to continue service and new entities will want to join. Results of the survey will be reported to MPCA once a substantive number of responses are received. We expect this will require multiple efforts to contact stakeholders via email and follow-up phone or virtual interviews.

b. Collection network

Collectors: At CIFFRO stakeholder meetings, multiple public and private boat wrap collectors and potential collection sites expressed interest in participating as a collector under the Program. Below is a list of survey recipients that have expressed interest in being a Program collection site partner.

- Becker County Environmental Services
- Beltrami County
- Brotex
- Carlton County Zoning & Environmental Services
- Cass County Environmental Service and Solid Waste
- Clay County Solid Waste
- Grant County Environmental Services
- Hubbard County Solid Waste
- Lakehead Boat Basin, Inc.
- Land O' Lake Marine
- McLeod County Environmental Services
- Otter Tail County Solid Waste
- Pope Douglas Solid Waste Management
- Scott County
- Sherburne County
- St Paul Yacht Club
- Western Lake Superior Sanitary District
- Willeys Marine

CIFFRO expects this list to grow based on surveys and one-on-one meetings. A more substantive list of potential 2026 Program collection sites will be provided to MPCA. CIFFRO will need to enter into contracts with each site.

- i. *Transporters*: Once a list of potential 2026 Program collection sites is established, CIFFRO will work with transporters servicing current collection sites and/or publish a request for bid to procure transport services for already existing and new collection sites. This information will be provided to MPCA when available.
- ii. *Recyclers*: CIFFRO spoke with multiple plastics recyclers during the stakeholder consultation process and many were interested in acting as a recycler under the Program. Up North Plastics Inc.¹ and GDB International have shared interest in participating as a recycler under the Program. CIFFRO anticipates working with multiple recyclers to make the Program successful, but first needs to establish a list of collectors prior to entering into agreements with plastic recyclers.

¹ Up North Plastics, Inc. is a subsidiary of Poly-America, L.P.

Plan Content Requirement: A stewardship plan must contain:

Subd. 5. (6) a description of how discarded boat wrap will be safely and securely transported, tracked, and handled from collection through final recycling and disposal of residuals;

6. Description of Boat Wrap and Residual Handling, Transport and Tracking Procedures

- a. It is CIFFRO's intent to work with service providers who are licensed and experienced in the safe collection, transportation, recycling, and disposal of recyclable and waste materials. Industry best practice will be applied to managing boat wrap safely and securely to ensure there is no detrimental environmental impact, and that the material is being managed as efficiently as possible.

End-of-life boat wrap will be picked up by a designated Program hauler. Prior to pick up, the Program partner collection site will contact CIFFRO to request a pickup; for tracking purposes the pickup will be given an order number. This order number is required to track the pickup location and date, and it is also necessary for acceptance by an approved Program recycling facility.

Material will be weighed when delivered to an approved Program recycling facility and reported to an independent third party responsible for administering the Program. Additionally, approved recyclers will be required to report the weight of residual and contaminated material being sent for recycling or disposal after it is processed, including what type of facility it is being sent to (ex: recycling or landfill).

Prior to the recycling process, recycling facility employees will manually remove any easily accessible "trash". Once hand-picked, the material will be processed through a shredder, followed by an extruder. The extruder melts, mixes and filters the recycle. The clean molten polyethylene is then water cooled and pelletized.

Recyclers will be required to provide proof that all proposed disposal sites are properly permitted to manage the type of residue generated, and all recycling facilities will be audited annually to ensure compliance with the Program.

Lastly, boat wrap collection site visits will be conducted as sites first contract with the Program and then on a rotating basis biennially thereafter, to confirm the use of best practices to support the intent of the Law.

- b. CIFFRO will work to establish a system that continuously tracks tonnage collected on a site-by-site basis and any contamination issues reported by the recyclers. An annual survey will be sent to collection sites for feedback. As this data is collected during Program Year 1 of implementation, the goal is to determine the following:
 - i. Communities that generate the highest tonnages of boat wrap
 - ii. Communities that need additional collection points
 - iii. Communities that need additional education and/or training to improve the quality of wrap received by recyclers
 - iv. Communities that need additional education and/or training to efficiently pack the material for shipment
 - v. Operational approaches that result in the highest tonnage, cleanest material, and lowest complaints
 - vi. Communities that would benefit from on-call services to collect during a certain time of year rather than year-round storage of material

Plan Content Requirement: A stewardship plan must contain:

Subd. 5. (7) a description of the methods that will be used to separate and manage nonrecyclable materials attached to boat wrap and to recycle discarded boat wrap

7. Methods Used to Recycle Boat Wrap and Nonrecyclable Materials

- a. CIFFRO will develop a standard operating procedure that will be communicated to collectors participating in the Program. This will include the following requirements:
 - i. Removal of accessories added to the boat wrap upon installation, such as rope, tape, grommets, zippers, windows, doors, rivets, etc.
 - ii. Maintaining cleanliness of the wrap to limit the amount of wetness and sediment residue present
 - iii. Consolidation of the wrap by rolling it up neatly. This would need to be done on a clean and dry surface (to avoid dirt and rock contamination).

- b. Regarding the handling of boat wrap or Low Density Polyethylene (LDPE) material: all LDPE material that meets the cleanliness requirements of Program recyclers will be recycled.
- c. Regarding the handling of non-LDPE material:
 - i. The removal of non-LDPE items is required since that material must be recycled by different processes and typically is outside the scope of plastics recycling facilities.
 - ii. To minimize labor costs, CIFFRO will require collectors to remove these materials prior to consolidation.
 - iii. CIFFRO will seek solutions that allow for the recycling of non-LDPE materials and determine if the end markets exist prior to the end of Program Year 1. If the material cannot be recycled, it will be sent to landfill.

Plan Content Requirement: A stewardship plan must contain:

Subd. 5. (8) a description of the promotion and outreach activities that will be undertaken to encourage participation in the boat wrap collection and recycling programs and how their effectiveness will be evaluated;

8. Promotion and Outreach Activities

a. **Promotion and Outreach Description**

CIFFRO will develop and implement a statewide public education campaign describing the benefits of recycling and/or reusing boat wrap that will encourage participation in the Program by boat owners and other boat wrap users such as marinas, boat storage establishments, boat manufacturers, boat dealers, and boat wrap service contractors.

It is the intent of CIFFRO to work with local governments and existing boat wrap collection sites to learn what type of public education mechanisms work best for their communities and/or memberships and to build upon that base. CIFFRO's public education campaign will start in early 2026 and be ongoing.

Program education initiatives will focus on reducing waste, positive impact on the environment, and promoting a circular economy in Minnesota. Recycling boat wrap can significantly reduce the amount of plastic waste that ends up in landfills and waterways while protecting the environment and

marine life. It will also promote sustainable practices within the boating community.

By understanding the "why" behind these efforts, stakeholders will be more motivated to participate and support the program, leading to a cleaner and greener Minnesota.

In addition to public education tools promoting the merits of recycling and/or reuse, CIFFRO will utilize a multi-pronged marketing strategy to ensure that proper handling and recycling of boat wrap is encouraged.

b. *Educational Collateral and Outreach*

To effectively disseminate information, CIFFRO will develop a variety of educational collateral tailored to different stakeholder audiences. We will leverage existing communication channels such as a dedicated Program website, point of sale or retailer promotion, social media, radio, and PSAs to reach a wider audience. A toolkit with different types of Program messaging and guidance documents will also be created over time.

Examples of the types of communication or collateral to be utilized include:

- A detailed guide for Program collection sites explaining how to properly remove contaminants, store, and prepare boat wrap for transport.
- A toolkit with Program messaging and graphics for different media platforms or channels so that participating communities or collection sites can localize their promotion of the Program.
- Retailer point of sale displays or handouts
- Easily accessible boat wrap collection site information on CIFFRO's website
- PSAs
- Social media

CIFFRO will also look for opportunities to collaborate with state government entities already conducting public education to boat owners, boating communities and water sport and marine enthusiasts such as MPCA and the Department of Natural Resources.

c. *Evaluation and Continuous Improvement*

CIFFRO recognizes that recycling targets stated in the Law cannot be met without an effective statewide public education program that speaks to the reasons for, and ease of, participation in the Program. Knowing that people

get their information in different ways and that it will take several touch points to reach them is crucial in developing and rolling out a public education program.

It is CIFFRO's intent to measure the impact of its efforts and identify areas for improvement through regular assessments of educational materials and methods.

Increasing awareness among boat owners and boat wrap users of collection and recycling opportunities year-over-year within the first five Program years will be a Program focus.

Plan Content Requirement: A stewardship plan must contain:

Subd. 5. (9) the annual performance goals established by the commissioner under subdivision 12;

9. Annual Performance Goals

- a. Annual performance goals have not been established by the Commissioner as of yet. It is CIFFRO's intent to work collaboratively with the Commissioner and MPCA staff to establish realistic performance goals based on verifiable data.

Plan Content Requirement: A stewardship plan must contain:

Subd. 5. (10) evidence of adequate insurance and financial assurance that may be required for collection, transport, reuse, recycling, and disposal operations;

10. Insurance and Financial Assurance

- a. As CIFFRO is a newly formed Stewardship Organization seeking non-profit status and the breadth of Program Year 1 boat wrap collection and recycling locations and activities are not fully determined yet, CIFFRO recommends providing evidence of adequate insurance to the Commissioner at a future date prior to Program implementation.

Similarly, ClIFFRO requests that evidence of financial assurance also be presented to the Commissioner once it is better understood what Program Year 1 collection and recycling infrastructure and operational requirements may entail. It is anticipated this will be prior to Program implementation.

Plan Content Requirement: A stewardship plan must contain:

Subd. 5. (11) a discussion of the status of end markets for collected boat wrap and what, if any, additional end markets are needed to improve the functioning of the program.

11. End Markets

- a. Through stakeholder consultations it was learned that there are multiple recyclers interested in receiving clean boat wrap for processing and once pelletized the material can be integrated back into the production of compatible products such as plastic film, bags, lumber, decking and more.

Stakeholder Consultation

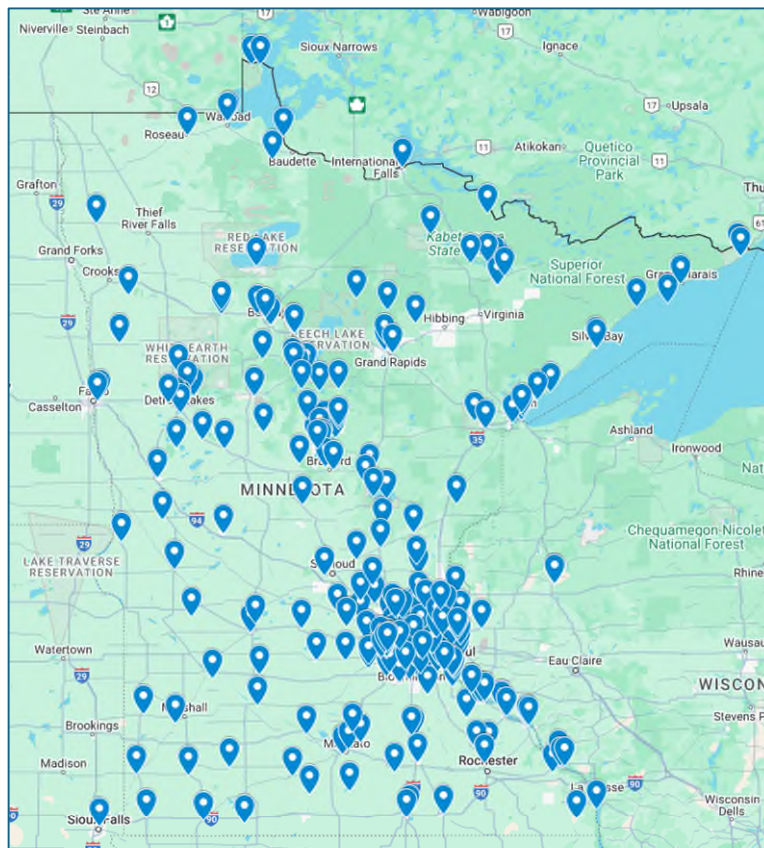
Subd. 6. Consultation required.

In developing a stewardship plan, a stewardship organization must consult with stakeholders, including boat owners, owners of marinas and boat storage establishments, contractors, collectors, recyclers, Tribes, and local government units.

Currently there is no operational or performance related documentation publicly available about Minnesota's current boat wrap collection and recycling infrastructure, CIFFRO conducted outreach to a list of 300+ Minnesota based stakeholders to formulate this plan. See Figure 1 below for the geographic location of stakeholders contacted throughout the state.

CIFFRO also consulted boat wrap programs currently operating at a local level in other states to gather more information to formulate this plan.

Figure 1



Formal consultations with stakeholders began in 2025 and will continue over the coming months to ensure an adequate amount of feedback from all stakeholders and potential collection and recycling partners is received and incorporated into the ultimate Program design prior to Program implementation.

Consultations were carried out via in-person and online stakeholder meetings, surveys, and one-on-one calls to better understand where and what types of service are available today, what challenges collectors and recyclers face when setting up or managing a collection program, and where new or increased collection service may be needed in the future to ensure convenience for all areas of the state (both urban and rural) as required under the Law.

The types of stakeholders CIFFRO did outreach to and or consulted with included boat owners, boat wrap producers, marina and boat storage facility managers, boat wrap distributors, boat wrap service contractors, boat wrap collection sites and collectors, boat dealers, plastics recyclers, local governments and tribal communities.

Additionally, CIFFRO consulted with the MPCA, Representative Larry Kraft (Law sponsor) and stakeholder trade associations, such as those listed below to help develop a stakeholder outreach list, better understand who the stakeholders are in Minnesota and to publicize stakeholder engagement efforts:

- Recycling Association of Minnesota
- Marine Retail Association of the Americas
- Association of Marina Industries
- Midwest Marina Association
- National Marine Manufacturers Association

CIFFRO held an in-person stakeholder meeting on February 19, 2025, in Woodbury, Minnesota and an online stakeholder meeting on February 24, 2025. Twenty-six stakeholders attended the in-person meeting. Seventy-eight stakeholders attended the online meeting.

At both meetings, an overview of the Law and stakeholder responsibilities were presented. Topics presented for discussion included:

- RLG's approach to operations
- Desired infrastructure and potential program rollout scenario
- Actual and anticipated challenges
- Existing boat wrap infrastructure for collection and recycling in Minnesota

At the in-person meeting a robust conversation was had about how things are working now in some communities, what a statewide program might look like in the future and how the Law may impact different stakeholders financially in the short and long term. There was

overall positive feedback about wanting to make the program work and an agreement that boat wrap should be recycled. With that said, many expressed concerns about how the program may affect their business from an operational or financial stand-point and sought more clarification on certain topics or circumstances under the Law. Enforcement of the boat wrap sales ban on September 1, 2025, was a concerning topic for many.

At the virtual meeting many questions were brought up about how the Law came about and what type of operational and financial research was done to support what the Law requires. Questions and statements about biodegradable boat wrap, if recycling partners had been identified and if reuse opportunities had been investigated were presented. A number of local governments discussed their current or past collection operations and associated successes, failures and frustrations.

Starting on February 24, 2025, a general interest survey was sent to the Minnesota stakeholder list developed by CIFFRO and stakeholder meeting attendees to gather additional feedback and inquire about possible participation in the Program. A copy of the survey can be found in Appendix A.

The survey provides an opportunity for all identified possible Program stakeholders to give input or feedback on their experience, the Law and CIFFRO's proposed approach to boat wrap collection. It also provides stakeholders who attended the February stakeholder meetings that perhaps did not feel comfortable discussing their thoughts in front of other stakeholders an opportunity to communicate directly with CIFFRO.

As of March 1, 2025, 32 survey responses have been received – It is anticipated follow up emails and phone calls will be needed over the next few months to ensure CIFFRO will be able to recruit enough collection partners to ultimately support a broad array of collection sites in Program Year 1 and then ultimately a convenient statewide boat wrap collection infrastructure in 2027 and onward.

APPENDIX A

Stakeholder Survey

A screenshot of the first two pages of the online general interest survey sent to Minnesota boat wrap stakeholders starting February 24, 2025 is below. The survey consists of 21 questions and the questions respondents were presented after Question 6 (*What best describes your organization?*) varied based on how they responded to Question 6. Text from the email that accompanied the survey explaining the purpose of the survey and the text for all 21 questions is also presented below.

MN Boat Wrap Collection Program Survey

This survey will be used to implement the MN Boat Wrap Stewardship Law, and your input will directly influence the development of a statewide collection network. We are seeking feedback from boat owners, marinas, boat storage establishments, contractors, recyclers, tribal nations, and local government units, and any other stakeholders in order to design a program that is both effective and sustainable.

This survey should take less than 10 minutes to complete. Your responses are confidential, and participation is voluntary. You may skip any non-mandatory question or return to edit your answers as needed. Your insights are valuable in helping us create a streamlined, efficient, and community-focused boat wrap collection network. Thank you for your contribution. Copy the link for a Boat Wrap FAQ: <https://www.pca.state.mn.us/sites/default/files/w-ps1-06.pdf>

Email us at boatwrap@rev-log.com for any additional comments or questions.

* Required

Section 1 of 2

1. Organization name *
2. Address of your organization: number, street, city, state, zip code *
3. Your full name *
4. Phone number (e.g. 123-456-7890) *
5. Email *

MN Boat Wrap Collection Program Survey

* Required

Section 2 of 2

6. What best describes your organization?

*

- ☐ Boat dealer
- ☐ Boat manufacturer
- ☐ Boat owner
- ☐ Boat storage establishment
- ☐ Boat wrap distributor
- ☐ Boat wrapping service provider
- ☐ Local government unit
- ☐ Marina
- ☐ Recycler
- ☐ Transporter/Hauler
- ☐ Tribal nation
- ☐ Other

Email Introduction

We are reaching out as part of our efforts to implement the MN Boat Wrap Stewardship Law, which establishes a statewide network funded by boat wrap brand holders for the collection and recycling of boat wrap. Our brief survey is designed to gather insights and lessons learned from existing collectors and other stakeholders, including boat owners, marinas, boat storage establishments, boat wrap service providers, collectors, recyclers, tribal nations, and local government units.

Please note that while tribal entities and local governments are welcome to share their perspectives on the program, they are not required to participate as collectors under the law. Based on your survey responses, we may follow up with a call to gain a deeper understanding of your programs and any challenges you face, at which time we may ask for more detailed cost information.

Your input is valuable in helping us design an efficient and sustainable collection network.

Survey Text:

This survey will be used to implement the MN Boat Wrap Stewardship Law, and your input will directly influence the development of a statewide collection network. We are seeking feedback from boat owners, marinas, boat storage establishments, boat wrap service providers, recyclers, tribal nations, and local government units, and any other stakeholders in order to design a program that is both effective and sustainable. This survey should take 10 minutes to complete. Your responses are confidential, and participation is voluntary. You may skip any question or return to edit your answers as needed. Your insights are valuable in helping us create a streamlined, efficient, and community-focused boat wrap collection network. Thank you for your contribution.

** = mandatory question*

1. *Please provide the following information:
 - a. *Organization
 - b. *Address (Street, City/Town, State & Zip)
 - c. *Contact person (First & Last Name)
 - d. *Email
 - e. *Phone (123-456-7890)
2. *What best describes your organization? Select all the apply
 - a. Boat dealer
 - b. Boat manufacturer
 - c. Boat owner
 - d. Boat storage establishment
 - e. Boat wrap distributor
 - f. Boat wrapping service provider
 - g. Local government unit
 - h. Marina
 - i. Recycler
 - j. Transporter/hauler
 - k. Tribal nation
 - l. Other – comment box
3. *For tribal nations: Are there any unique cultural, logistical, or environmental considerations that should be addressed in the program? - *dependent on 2g*
4. *For local government: What regulatory or administrative challenges do you anticipate in implementing this program? - *dependent on 2g*
 - a. Budgetary constraints
 - b. Coordination with state or local agencies

- c. Community engagement issues
 - d. Existing infrastructure limitations
 - e. Low tonnage
 - f. Other – comment box
5. *For Transporter/hauler/Recyclers: What operational challenges have you experienced with boat wrap materials? - *dependent on 2i or 2j*
- a. Cost-related challenges
 - b. Low tonnage
 - c. Material quality/contamination issues
 - d. Transportation/logistic issues
 - e. Other – comment box
6. *Do you feel your community, membership, or customers are in need of a collection site for boat wrap?
- a. Yes
 - b. No
 - c. Other - comment box
7. *How do you currently manage boat wrap disposal?
- a. Collection via dumpster to landfill
 - b. Consolidate material onsite and send to recycler
 - c. Hire boat wrapping service provider to handle it
 - d. I don't dispose of boat wrap
 - e. Other – comment box
8. Where do you send your boat wrap for disposal/recycling?
- a. Comment box
9. *Do you allow boat owners or members of the public to drop off boat wrap at your location, or have you in the past?
- a. Yes
 - b. No
10. How long have you been participating as a collection site, e.g. 3 years?
- a. Comment box
11. What is the current frequency of pick-up/drop-off, e.g. every few weeks?
- a. Comment box
12. Is the cost of your boat wrap collection and recycling subsidized? If so, would you be willing to share any data related to the costs of managing collections?

- a. Comment box
13. Based on your experience, what key lessons have you learned regarding boat wrap collection?
- a. Comment box
14. *Would you be open to being a collection site under the new boat wrap collection program?
- a. Yes
 - b. No
 - c. Not applicable
 - d. Other - comment box
15. Please share any marinas, boat storage facilities, local governments, or other stakeholders that you think may be interested in being a collection site.
- a. Comment box
16. *What challenges have you encountered, or foresee, in boat wrap collection/recycling? (select all the apply)
- a. Dirty, wet, or moldy wrap
 - b. Lack of labor
 - c. Lack of clear guidelines
 - d. Lack of financial resources
 - e. Limited recycling facilities/infrastructure
 - f. Transportation or logistical costs
 - g. Other – comment box
17. What is the biggest limiting factor when it comes to collecting boat wrap in your community?
- a. Comment box
18. *What are key success factors for a collection network in your view? (Select all that apply)
- a. Strong public education and outreach
 - b. Partnerships with local businesses and stakeholders
 - c. Flexible collection options
 - d. Streamlined administrative processes
 - e. Other – comment box
19. *What factors are most important to you if you were to participate as a collection site? (select all the apply)

- a. Frequency of collection
- b. Simplicity
- c. Cost
- d. Reliability of service
- e. Minimizing environmental impact
- f. Other – comment box

20. Please list the names of any boat wrap brands that you may use, sell, or are aware of being sold in Minnesota

- a. Comment box

21. Please share any additional feedback that you think would be useful for the implementation of the MN Boat Wrap program.

- a. Comment box