



March 11, 2024

Representative Ginny Klevorn
Chair, State and Local Government Finance and Policy Committee
581 State Office Building
St. Paul, MN 55155

Representative Sydney Jordan
553 State Office Building
St. Paul, MN 55155

Dear Chair Klevorn, Representative Jordan, and Esteemed Members of the State and Local Government Finance and Policy Committee:

We, the undersigned associations representing the marine industry: the National Marine Manufacturers Association (NMMA), the Water Sports Industry Association (WSIA), and the Marine Retailers Association of the Americas (MRAA) would like to formally express our collective opposition to the mandates and cost increases stipulated within House File 3577. As associations dedicated to the sustainable development of the marine industry, we seek to share our concerns and advocate for a collaborative approach to waste reduction that does not unduly burden our members.

NMMA is the trade association for the U.S. recreational boating industry, representing nearly 1,500 marine businesses, including recreational boat, marine engine, and accessory manufacturers. Our members are often U.S.-based small businesses, many of which are family owned. NMMA members collectively manufacture more than 85 percent of the marine products sold in the U.S. Furthermore, the recreational boating industry has a \$230 billion impact on the nation's economy and in communities across the country, with nearly 700,000 American jobs across 35,000 U.S.-based marine businesses.

WSIA is the towed watersports industry's leading advocate, working to strengthen, grow boating and protect the interests of its member companies and recreational boaters across the country. The WSIA develops best practices, maintains waterway access rights, educates participants, and promotes safety on the water, including when participating in towed watersports. WSIA represents over 440 member companies, including boat, marine engine, and accessory manufacturers, as well as marine dealers.

MRAA is the leading trade association of North American small businesses that sell and service new and used recreational boats and operate marinas, boatyards, and accessory stores. MRAA represents more than 1,300 individual member retail locations and conducts advocacy efforts on their behalf.

Minnesota's recreational boating industry is integral to the state's economic and social fabric, contributing an annual economic impact of \$6.9 billion and supporting over 25,000 jobs as well as 700 businesses. Minnesota currently has over 822,000 boat registrations, which is the second most registrations per—capita in the United States.

Our industry's commitment to sustainability and waste reduction is exemplified by the successful conversion of over 80,000 pounds of polyethylene and polypropylene sheet plastics, critical components of marine products, through various state-level recycling programs since 2021. This concerted effort demonstrates the marine industry's dedication to actively contribute to the reduction of plastic waste, a critical issue impacting marine ecosystems.

Furthermore, our member companies have taken proactive measures to incorporate recycled materials into manufacturing processes, exemplified by Arkema's development of fully recyclable aluminum and fiberglass boat materials. This innovation not only reduces the environmental footprint but also promotes circular economy principles by ensuring the full recyclability of hull and structural components at the end of a product's lifecycle.

In tandem with manufacturing innovations, our industry has placed a significant emphasis on sustainable shipping materials, transitioning away from traditional plastics to alternatives such as cardboard and bamboo straps. These initiatives further underscore our holistic approach to the manufacturing process, integrating sustainability at every level of the global marine products supply chain.

While we align with the overarching objective of waste reduction, we believe that the mandates and cost increases outlined in House File 3577 may have unintended consequences. We propose a collaborative approach that incentivizes efforts to reduce waste in landfills without artificially raising manufacturing and consumer costs. As part of this approach, we fully support investments in proven programs and technologies that effectively enhance clean material integration into the recycling system, as well as recycling infrastructure and public education to drive behavioral changes.

Furthermore, Minnesota already has a well-funded solid waste management infrastructure in place. The Solid Waste Management Tax raises over \$100 million annually. Should any modifications be contemplated for Minnesota's existing and successful recycling and waste management programs, we urge a collaborative and comprehensive approach, considering current packaging requirements, systems, and product availability, as well as existing investments.

It is imperative that any alterations to existing legislation be meticulously vetted through each aspect of the global supply chain to ensure that the proposed changes align with our shared goals and are achievable without unintended consequences. Recognizing Minnesota's role within the

marine industry's global supply chain, we assert that any extended producer responsibility requirements must complement and support a coordinated international effort.

We deeply appreciate the opportunity to articulate our concerns regarding House File 3577 and remain open to further dialogue on how marine manufacturers can contribute to waste reduction, not only within Minnesota but throughout the nation.

Sincerely,

Jesse McArdell



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National Marine Manufacturers Association

Ethan Hellier



Midwest Government Affairs Manager
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Chad Tokowicz



Government Relations Manager
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