



April 1, 2025

Minnesota Senate
Attn: Chair Matt Klein
Room G—15 Capitol Building
75 Rev. Dr. Martin Luther King, Jr. Blvd.
Saint Paul, MN 55155

Subject: Opposition to SF 1690 – Stewardship Program for Circuit Boards, Batteries, and Electrical Products

Dear Chair Klein and members of the Senate Commerce Committee,

I am writing on behalf of the National Marine Manufacturers Association (NMMA), the Marine Retailers of the Americas Association (MRAA), and the Watersports Industry Association (WSIA) to express our opposition to SF 1690, which establishes a stewardship program for circuit boards, batteries, and electrical products. While we support the goal of environmental stewardship and share the commitment to reducing pollution in marine ecosystems, we believe this legislation could have unintended consequences for the boating industry.

NMMA is the leading trade association representing the recreational boating industry in North America. It is dedicated to industry growth by promoting product quality assurance, the boating lifestyle, public policy advocacy, market statistics, and research. NMMA member companies produce more than 80 percent of the boats, engines, trailers, accessories, and gear used by boaters and anglers throughout the US and Canada.

WSIA serves as the primary advocate for the towed watersports industry, striving to strengthen and grow boating while protecting the interests of its member companies and recreational boaters. WSIA works to develop best practices, preserve waterway access, educate participants, and promote safety, particularly in towed watersports activities. With over 440 member companies, WSIA represents a diverse range of stakeholders, including manufacturers of boats, marine engines, accessories, and marine dealers.

MRAA is the leading trade association for North American small businesses involved in selling and servicing new and used recreational boats, as well as operating marinas, boatyards, and accessory stores. MRAA represents more than 1,300 retail locations and advocates for their interests.

Our primary concern with S.F. 1690 is the potential rise in operational costs resulting from the compliance demands of the stewardship program. Small marine businesses in Minnesota that depend on batteries, circuit boards, and other electrical components may face increased expenses as they are forced to invest in new systems and infrastructure to comply with the bill's requirements. This would place a significant financial strain on these small and medium-sized businesses, which are already grappling with challenging economic conditions.

Additionally, the bill introduces numerous new regulations and compliance requirements that would create significant administrative burdens. Small marine businesses would need to divert resources from

their core operations to meet these new obligations, potentially affecting their efficiency. For example, the requirement to manage and dispose of covered products at designated collection sites or recycling facilities presents logistical challenges, particularly for NMMA member businesses located in rural areas of Minnesota, where such facilities are often not readily accessible.

The prohibition of certain mercury-containing batteries and the introduction of new labeling requirements would also disrupt the sourcing of essential components, leading to disruptions in our international supply chains. This would likely result in delays and increased costs for obtaining compliant products, making it more difficult for marine businesses to continue operations and fulfill customer demand.

S.F. 1690 aims to replace Minnesota's current recycling program with a more expansive extended producer responsibility framework that covers products beyond traditional electronics. This significant shift would introduce unnecessary complexity and costs for marine businesses. Given these concerns, the NMMA, WSIA, and MRAA urges the committee to reconsider this legislation. While we support environmental protection, we believe a more targeted and practical solution is needed. We look forward to engaging in constructive dialogue to find a balanced way forward. For any questions, please contact jmcardell@nmma.org.

Sincerely,

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