



April 8, 2025

Minnesota Senate
Attn: Chair Matt Klein
Room G—15 Minnesota Senate Building
95 University Ave W.
Saint Paul, MN 55155

Subject: Support for S.F. 2216 – Commerce Omnibus Provisions

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 Association of the Americas (MRAA), and the Watersports Industry Association (WSIA) to express our support for Section 7, Lines 85.6 – 85.9, which clarify the sale and distribution of products with intentionally added PFAS in internal components, and Line 86.16, which removes “keys” from the list of products covered by the lead and cadmium prohibition in MN 325E.3892, making their manufacturing, sale, and distribution legal upon enactment.

NMMA is the leading trade association for the recreational boating industry, representing over 1,300 businesses, including manufacturers of recreational boats, marine engines, and accessories. Many of our members are small, family-owned businesses based in the United States. Collectively, they account for more than 85% of the marine products sold in the U.S. The recreational boating industry contributes \$230 billion to the national economy and supports over 812,000 jobs across 36,000 businesses nationwide.

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.

We strongly support the provision in Lines 85.6 – 85.9, which specifies that products containing intentionally added PFAS in internal components—provided these components do not directly contact a person’s skin or mouth during typical or foreseeable use—are not subject to Minnesota’s PFAS restrictions. This exemption is vital for the marine industry, where PFAS are used in certain applications to improve product performance, durability, and safety, without posing any risk to human health. By including this provision, manufacturers can continue to produce and distribute high-quality marine

products without facing unnecessary challenges in removing materials that do not directly impact consumers.

Additionally, we support the amendment in Line 86.16, which strikes "keys" from the list of covered products under Minnesota Stat. § 325E.3892, thus making the manufacturing, sale, distribution, and offering for use of keys legal upon enactment. This is a crucial change for our industry, where keys and key fobs are integral components of boats and watercraft, and ensuring their continued availability is essential for both the safety and operation of these products.

The provisions in Article 7, lines 85.6 – 85.9 and 86.16, provide marine manufacturers with the necessary time and flexibility to address environmental concerns while continuing to deliver high-quality products that meet customer demands. We strongly urge your ongoing support for S.F. 2216, as it effectively balances environmental priorities with the need to maintain the operational and economic stability of Minnesota's marine industry.

Thank you for your consideration. We look forward to working with this committee to continue finding solutions that protect both public health and the economic health of our industry.

Sincerely,

Jesse McArdell



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Government Relations
National Marine Manufacturers
Association

Lee Gatts



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