

# **Minnesota Boat Wrap Stewardship Plan**

## **(Revised)**

### **August 27, 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 the management of discarded boat wrap. The Plan is intended to cover a period of five years commencing once 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 will be branded as the Wrap Recycle Right (“WRR”) Program and is referenced as such throughout this plan.

The Program is structured to provide convenient and free collection, transportation, recycling, reuse and or disposal of boat wrap for 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 has established interim Program goals for 2026 and 2027 and will work with the Commissioner to establish annual Program performance goals once adequate Program performance data is available. It is anticipated this may take until 2027. CIFFRO will submit its first annual report to the Commissioner describing Program operations and performance (including financial audit) during the previous calendar year by March 1, 2026. Such a report will be submitted annually and will include all reporting criteria as described in the Law and within this Plan.

CIFFRO is currently working with MPCA to pay the annual administrative fee due to the Commissioner 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.

## Definitions

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

**Best Management Practice ("BMP")** means a recommended guideline that informs Program Partners and other stakeholders how to best ensure compliance with the Law in their role, and handle boat wrap to ensure it is recycle-ready, if applicable.

**Boat** is defined in the Law as having the meaning given to watercraft under section [86B.005, subdivision 18](#).

**Boat Dealer** means a business that sells new or used boats to consumers. Boat dealers may also offer related services such as financing, maintenance, and boat wrap installation or removal.

**Boat Manufacturer** means a business that designs and builds boats for sale. Boat manufacturers may produce various types of watercraft, and often use boat wrap to protect boats during storage.

**Boat Storage Establishment** means a business that provides short- or long-term storage for boats, often during the off-season. These establishments frequently use boat wrap to protect boats from weather and environmental damage.

**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.

**Boat Wrap Waste** means any used, discarded, or no longer serviceable plastic material originally intended for wrapping boats to protect them during storage.

**Brand** is defined in the Law as a name, symbol, word, or mark that identifies boat wrap and attributes it to the boat wrap Producer.

**Collection and Storage Container Types** means containers that ClIFFRO may consider viable for Collection Site usage. Container types include but are not limited to dumpsters, enclosed semi-trailers, storage containers, and recapture bags.

**Collection Site** means a public or private site that collects boat wrap waste from individual and/or commercial boat wrap generators. This includes but is not limited to, recycling centers, material recovery facilities (MRFs), transfer stations, boat marinas, boat dealers, boat storage facilities, etc. Sites can be "participating collection sites" if currently participating in the Program, or "potential collection sites" if they have expressed an interest in participating in the Program.

**Collector** means any Program partner that operates a Collection Site.

**Commercial Boat Wrap Generator** means a commercial entity, such as a marina, boatyard, boat dealership, or marine service provider, that regularly uses boat wrap for boat storage, or protection. These businesses can generate significant volumes of used boat wrap and are key participants in recycling initiatives aimed at reducing plastic waste in the marine industry.

**Commercial Shrink Wrapper** means a business contracted to professionally manage the wrapping and unwrapping of boats using boat wrap materials. These service providers play a critical role in the lifecycle of boat wrap, ensuring proper application, removal, and facilitating responsible recycling practices.

**Community Partner** means any Minnesota entity that is part of the boating, marine, environmental, waste management or recycling community that is interested in promoting the Program.

**Contamination or Contaminants** means foreign matter found on boat wrap or residuals added to boat wrap that may prohibit recycling including but not limited to dirt, excessive moisture, adhesives, labels, tape, paint or minor non-recyclable attachments (ex: vents, porthole and door zippers, rivets).

**Handling** means preparing boat wrap material to be recycle-ready.

**Independent Auditor** is defined in the Law as an independent and actively licensed certified public accountant that is:

- retained by the 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.

**Individual Boat Wrap Generator** means an individual boat owner or private party who uses boat wrap to protect their personal watercraft, typically during off-season storage. While generating smaller quantities of wrap compared to businesses, individual consumers are essential contributors to recycling efforts and play a vital role in promoting sustainable boating practices.

**Marina** means a designated facility or harbor that offers boat docking, storage, and services—often with access to utilities like water, fuel, and electricity. The level of boat wrapping services offered at marinas varies. Marinas can be public or privately owned, and typically serve a wide range of boaters, from seasonal slip renters to transient travelers.

**Methods of Collection** means mechanisms utilized to collect recycle-ready boat wrap material including but not limited to dumpsters, enclosed semi-trailers, storage containers, and recapture bags.

**Non-Program Material** means any plastic film-like materials that would not be considered boat wrap waste including but not limited to agricultural film, plastic grocery or take away bags, plastic trash bags, plastic tarps, boat wrap waste generated out-of-state, or trash.

**Producer** is defined in the Law, with respect to boat wrap that is sold, offered for sale, imported, or distributed in the state by any means, as 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.

**Program** means the stewardship program pertaining to Boat Wrap operated and administered in the State of Minnesota in accordance with an approved Minnesota Boat Wrap Stewardship Plan. The Program in this plan is also referenced as the WRR Program.

**Program Coordinator** is the lead staff member responsible for the Program's planning, operations, logistics, communication, and stakeholder engagement to ensure effective implementation and essential public awareness.

**Program Material** means recycle-ready boat wrap material.

**Program Partner** means a collector, collection site, transporter, recycler or any other entity that has entered into a participation agreement with CIFFRO to act as part of the Program collection and recycling infrastructure for boat wrap in Minnesota.

**Recycle or Recycling** is defined in the Law as 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.

**Recycle-Ready Boat Wrap Material** means boat wrap removed from boats after seasonal use that is free of contaminants. Recycle-Ready Boat Wrap Material can include off-cuts from installation or removal processes.

**Recycler** means any recycling business that can recycle recycle-ready boat wrap material by adhering to the definition of recycling as defined in this plan.

**Recycling Center** means designated recycling centers as described in Minnesota Statute 115A.555.

**Recycling Facility** means a business that recycles program material on site.

**Regions** means geographical Program areas of Minnesota where Program boat wrap collection, consolidation, and/or recycling occur that are defined using data-driven insights to ensure consistency, accuracy, and relevance in CIFFRO reporting and analysis.

**Retailer** is defined in the Law as a person that sells or offers boat wrap for sale in or into this state by any means. Means of sale include direct sales via telephone, website, email, letter, brick and mortar and pop-up locations, and via online marketplaces.

**Self-Hauler** means an individual or commercial boat wrap generator that chooses to self-haul their recycle-ready boat wrap material to a collection site.

**Standard Operating Procedure (“SOP”)** means a step-by-step set of instructions that outline how Program Partners or stakeholders should handle boat wrap, from application, removal and collection, to ensure it is recycle-ready. SOPs will include BMPs to ensure consistency, safety, and environmental responsibility in boat wrap handling.

**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.

**Transport** means the movement of recycle-ready boat wrap material from Program collection sites through the recycling process, including sorting, processing, and/or final disposition at an end-of-life destination. Program transport will ensure recycle-ready boat wrap material is efficiently and responsibly moved within the Program recycling system.

**Transporter** means an insured Program Partner that safely and securely moves recycle-ready boat wrap material from collection and/or consolidation sites, through to the end-of-life destination.

# 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 described in the below sections; each of which is prefaced by a text box with the actual statute language as point of reference.

CIFFRO anticipates implementation of the plan to begin before the September 1, 2025 sales ban with the focus being as follows:

1. Executing participation agreements with relevant Program Partners.
2. Informing appropriate stakeholders about the September 1<sup>st</sup> boat wrap sales ban in Minnesota.
3. Working with Collectors and Collection Sites to ensure they are prepared for Program implementation.
4. Providing public education materials for WRR Program and community partners.

The work performed in 2025 will establish the foundation for the WRR Program and ensure the successful operation of the Program, beginning in the spring of 2026, when boat wrap volumes are expected to be at their highest. Additionally, CIFFRO (or their designate) will communicate regularly with MPCA during the development and implementation phases of this plan, with the goal of fostering good communication and alignment between the two parties.

Please note, Program Year 1 (PY 1) in the plan, refers to the 2026 calendar year, Program Year 2 (PY 2) refers to the 2027 calendar year, 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**

The Commercial and Industrial Flexible Film Recycling Organization (CIFFRO) is the legal name of the Stewardship Organization formed to plan, implement, manage and finance a Plan and Program on behalf of boat wrap Producers



affected by the Law. CIFFRO was incorporated as a company in the District of Columbia in February 2025 and submitted an application to become a 501(c)(3) non-profit organization to the IRS in June 2025. CIFFRO registered with the Minnesota Secretary of State on July 21, 2025.

The CIFFRO Board of Directors currently include:

Chairman: Kelsey Pigneri of Poly-America, L.P.  
Treasurer: Brandon Lee of Poly-America, L.P.  
Secretary: Michael Stenberg of Dr. Shrink, Inc.

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

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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:

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

- Brand: No brand

It is anticipated that additional Producers will join CIFFRO in the coming months as participating in a stewardship organization is a requirement to continue selling, distributing or importing boat wrap in or into Minnesota effective September 1, 2025.

CIFFRO shall actively conduct outreach and recruitment activities to non-member Producers to join CIFFRO and be in compliance with the Law. CIFFRO shall provide known Producer contact information to the MPCA for the purposes of:

- i) outreach to Producers regarding their responsibility to join the stewardship organization;
- ii) assisting MPCA with its responsibility under Minn. Stat. § 115A.1416, subd. 12(a) of the Law to post on its website the names of all compliant and known non-compliant Producers and their brands, and;
- iii) compliance and enforcement.

This website information will inform all Program participants of Producer/brand compliance status so that all participants can be in compliance with the requirements of Minn. Stat. § 115A.1416, subd. 3 (a).

*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 WRR Program will accept all discarded recycle-ready boat wrap material regardless of which entity produced it. All recycle-ready boat wrap material accepted by Program Collection Sites or Collectors, 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;*

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

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

*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;*

*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*

*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;*

### **3. Integrated Approach to Establishing, Operating, Promoting Participation in and Evaluating the Effectiveness of a Statewide Boat Wrap Stewardship Program**

Sections 3, 4, 6, 7, and 8 of Subdivision 5 of the Law require CIFFRO to outline how it intends to establish and build out a statewide boat wrap collection and recycling infrastructure in Minnesota and meet interim and annual recycling and other performance targets. To support stakeholder buy-in of this new Program, it is important that a well-defined, cohesive framework and robust stakeholder education campaign be established prior to program implementation and then reassessed annually for improvement opportunities.

To ensure Program participation and success, CIFFRO has developed a coordinated operational framework that clearly defines:

- 1) Program terms and terminology,
- 2) types of Program stakeholders,
- 3) the responsibilities of each stakeholder and how they will be held accountable,
- 4) criteria for choosing Program Partners,
- 5) methods of collection,
- 6) how recycle-ready boat wrap material and residuals will be handled, transported and tracked, (Detail regarding these topics and methods of recycling and handling are combined as one in Section 3.6)
- 7) methods of recycling and handling of non-recyclable materials, (See Section 3.6)
- 8) how CIFFRO will inform, educate, and engage with each stakeholder, and,
- 9) how CIFFRO will track and evaluate Program progress and effectiveness.

These criteria and the operational framework mentioned above are described in more detail in the following sections.

Section 5 of Subdivision 5 of the Law requires that a list of names and locations of Collection Sites, Transporters, reuse facilities, and Recyclers that will manage recycle-ready boat wrap material be cited in the plan. CIFFRO defines these entities as Program Partners. A list of Program Partners can be found in Appendix B.

### **3.1 Program Terms and Terminology**

Descriptions of key terms and terminology used throughout this plan, are provided in the Definitions Section to ensure clarity with Program implementation, ongoing management, and regulatory and operational expectations as well as stakeholder roles and responsibilities. These key terms and terminology will also be utilized on CIFFRO's WRR Program website (<https://www.wraprecycleright.org>) as well as all related public education, promotional and training materials.

### **3.2 Types of Program Stakeholders**

There are various stakeholder groups whose participation in the Program is integral for implementation, growth, as well as short and long-term success. Below is a list of key Program stakeholders broken out by category of Program activity or operation.

- 1) Producers
- 2) Retailers (retailers may fall under multiple stakeholder categories)

- 3) Boat Wrap Generators (Individual, Commercial)
- 4) Program Partners (Collection sites, Transporters, and Recyclers)  
Collection sites can include but are not limited to, boat dealers, boat manufacturers, boat storage establishments, commercial shrink wrappers, marinas, recycling centers, Retailers)
- 5) Community Partners

### **3.3 Stakeholder Responsibilities and Accountability**

Each stakeholder listed in Section 3.2 has a vital role in the funding, implementation, ongoing operation, promotion and/or overall capacity of CIFFRO to achieve the required Program performance targets defined in the Law. Defining the roles and responsibilities of each stakeholder and how they may be held accountable for their actions or participation in the Program should be clearly established prior to implementation.

Below are detailed explanations regarding roles and responsibilities for each of the stakeholders referenced in Section 3.2. and the strategies CIFFRO will utilize to engage and/or partner with each.

#### **1) Producers**

##### ***Producer Outreach and Responsibility Overview***

CIFFRO's Producer outreach efforts are a foundational component of the Program. CIFFRO's Producer outreach efforts are multifaceted and strategically designed to build awareness, foster participation, and clarify regulatory responsibilities. Activities have included desktop research to identify potential Producers, followed by targeted outreach via emails and phone calls to introduce the Program and flag their potential obligations under the law. These contacts often lead to personalized one-on-one calls. This direct engagement helps build trust and encourages open dialogue between CIFFRO and industry stakeholders.

In addition, outreach has included coordination through trade associations, targeted communications, and stakeholder engagement forums, all focused on keeping Producers informed and involved. These efforts aim to demystify regulatory expectations and underscore the pivotal role Producers play in enabling successful boat wrap recycling. Through sustained contact and education, CIFFRO is working to ensure that Producers are not only aware of their legal obligations but also join CIFFRO.

##### ***Key Producer Responsibilities***

Key Producer responsibilities include:

- 1) Joining the approved stewardship organization: CIFFRO
- 2) Signing CIFFRO's Producer Participation Agreement
- 3) Paying Producer membership fees
- 4) Providing requested sales and product data to CIFFRO
- 5) Funding Program collection, hauling, and recycling infrastructure
- 6) Actively supporting both the launch and long-term success of the stewardship organization

Under the law, Producers are required to collectively fund the planning, implementation and ongoing management of the Program. This begins with joining the approved stewardship organization, CIFFRO, and signing a Producer Participation Agreement, which formalizes their responsibilities as a member of CIFFRO.

The Producer Participation Agreement defines the legal relationship between companies and CIFFRO. Under this agreement, participating Producers are responsible for submitting accurate data, meeting annual reporting and fee payment obligations, and complying with CIFFRO's operational policies. CIFFRO members will be required to annually report data on product sales by product type and volume as well as 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.

CIFFRO, in its role as the stewardship organization, develops and administers the Program in order to meet all regulatory requirements on behalf of its Producer members. CIFFRO also establishes Producer fee structures and delivers support services to Producers such as guidance materials, onboarding protocols, dispute resolution procedures, and other resources as needed.

## **2) Retailers**

Retailers and wholesalers who sell or offer for sale boat wrap have an important responsibility to ensure regulatory compliance with the Law. They must verify that Producers are listed as compliant on the MPCA website at the time of ordering boat wrap. A "compliant" Producer is one that is actively participating in the WRR Program—meaning they have signed the Producer Participation Agreement with CIFFRO and are fulfilling their obligations, including paying the required stewardship fees.

### ***Retailer Responsibilities***

Retailer responsibilities include:

- 1) Verify Producer compliance under the Law by routinely checking the MPCA website for the most up-to-date list of compliant Producers before placing orders to purchase boat wrap.
- 2) Record the date of each boat wrap order and supplier Producer name and retain printed or digital proof of Producer status on the date of purchase.
- 3) Subscribing to updates from CIFFRO and MPCA to receive timely alerts regarding the compliance status of existing Producers or new Producers entering the Program.
- 4) Communicate Law requirements and updates internally with purchasing and retail staff regularly.
- 5) Conduct a monthly inventory review and audit recent purchases for continued compliance.

### **3) Boat Wrap Generators (Individual or Commercial)**

#### ***Commercial Boat Wrap Generators***

Commercial boat wrap generators include marinas, boat storage facilities, commercial shrink wrappers, boat dealers, boat manufacturers, and other similar businesses generating high volumes of boat wrap material.

#### ***Commercial Boat Wrap Generator Responsibilities***

Commercial Boat Wrap Generator responsibilities include:

- 1) Volunteer to act as a participating public Collection Site that accepts Program material from the public and is serviced by a transporter.
- 2) Volunteer to act as a participating private Collection Site that does not accept material from the public and is serviced by a transporter.
- 3) Self-haul their Program material to a public Collection Site.

#### ***Individual Boat Wrap Generators***

Individual boat wrap generators include boat owners and businesses with 10 or fewer boats generating boat wrap material. Their roles and responsibilities include self-hauling their Program material to a public or private collection site.

### **4) Program Partners (Collection sites, Transporters, and Recyclers)**

#### ***Program Collection Sites***

All WRR Program Collection Sites have the following roles and responsibilities:

- 1) Sign a Collection Site agreement with ClIFFRO to participate in the WRR Program.
- 2) Contact their Program Coordinator for requesting pickups, managing cancellations, coordinating deliveries and reporting issues and data to WRR.
- 3) Oversee access to the designated collection container and inform boat wrap generators of their responsibility to properly prepare boat wrap waste for recycling.
- 4) Review and follow the WRR SOP for operation of a participating Collection Site (See Appendix C for an example). This is based on BMPs for boat wrap collection and recycling.
- 5) Collect program material during the peak season (April – June), with optional fall season collection based on site requirements.

Public Collection Sites (which include recycling centers, transfer stations, MRFs, Retailers, some commercial boat wrap generators and other similar facilities) shall ensure that the designated collection container is open and accessible to the public either during designated hours or by appointment only.

Private Collection Sites (which includes some commercial boat wrap generators, marinas, and other similar facilities) shall use their discretion to decide if members of the public are allowed access to the designated collection container or if it will be solely used to collect their own recycle-ready boat wrap material.

### ***Program Transporters***

All WRR Program transporters have the following roles and responsibilities:

- 1) Sign a vendor agreement with ClIFFRO to participate in the WRR Program.
- 2) Provide proof of insurance, appropriate permits, certifications, and driver training.
- 3) Provide timely responses to pick up requests through the WRR Program Coordinator or designated Collection Site contact person.
- 4) Upon request, provide proof of pickup and/or delivery via Bills of Lading (BOL) or scale reports.

Third party logistics (which includes businesses for hire that transport loose-load or baled material in enclosed semi-trailers or smaller) shall ensure that program material is picked up from Collection Sites and delivered to the designated consolidator or Recycler in accordance with their ClIFFRO vendor contract. Haulers of recyclables (which includes businesses for hire that pick up loose program material from dumpsters) shall ensure that program material is picked up from



Collection Sites and transported to the designated consolidator or Recycler in accordance with their CIFFRO vendor contract.

### **Program Recyclers**

All WRR Program Recyclers have the following roles and responsibilities:

- 1) Sign a vendor agreement with CIFFRO to participate in the WRR Program.
- 2) Provide proof of insurance, appropriate permits, certifications, and employee training.
- 3) Allow CIFFRO access to their facility for audits or site inspections.
- 4) Ensure program material is weighed upon delivery to their facility and tracked through the recycling process.
- 5) Report weights received by BOL/pick up ID to CIFFRO on a monthly basis or more often upon mutual agreement.
- 6) Upon request, show proof of regrind or pelletized material being used for remanufacturing purposes.

## **5) Community Partners**

Community Partners are any entity that is part of the boating, marine, environmental, waste management, or recycling community that is interested in promoting the program, such as local governments like cities and counties, DNR, watershed districts, river and lake associations, water advocacy groups, trade groups, the general public, etc. Their roles and responsibilities include assisting CIFFRO with dissemination of the WRR Program using public education assets to improve public awareness of the program through various channels and formats.

### **Program Strategies**

CIFFRO has specific strategies for engaging or partnering with each stakeholder listed above, with the strategies grouped by PY 1 (launch & foundational development) and PY 2-5 (expansion, optimization, and impact).

**CIFFRO overall strategy:** In PY 1, CIFFRO will focus on establishing the foundational infrastructure necessary for long-term success. This includes the creation and launch of the Stewardship Organization, which will serve as the central coordinating body for all program activities. During this phase, CIFFRO will prioritize initiating the development of public education materials and supporting tools that will guide stakeholder participation and compliance.

As the program matures into PY 2-5, CIFFRO will shift its focus toward scaling operations, optimizing logistics, and deepening stakeholder engagement. The Stewardship Organization will continue to collect and analyze data on boat wrap sales and recycling volumes across Minnesota. This data will inform the strategic

expansion of the collection network to meet established recycling goals. Annual performance reports will be submitted to the Minnesota Pollution Control Agency (MPCA), and program strategies will be adjusted as needed to improve outcomes and ensure regulatory alignment.

**Producer strategy:**

**PY 1:** Continue to prioritize building Producer membership through direct targeted outreach to potential Producers and collaboration with trade associations, MPCA and Program Partners.

**PY 2 – 5:** CIFFRO will continue to engage with stakeholders mentioned in the PY 1 narrative above to refine Producer outreach strategies as necessary to identify, educate, and encourage Producers not participating in the program to become CIFFRO members or face regulatory penalties.

**Retailer strategy:**

**PY 1:** Engage early in the process to ensure retail entities understand their compliance obligations and BMP. For those interested in championing the program, CIFFRO will provide program-branded assets and promotional materials to help raise awareness and encourage customer participation.

**PY 2-5:** Retailers will remain key partners in the program's success. CIFFRO will maintain open lines of communication to support ongoing compliance and will use stakeholder feedback to refine outreach strategies that align with customer behavior and recycling objectives. Retailer promotional materials will continue to be offered in PY 2-5.

**Boat wrap generator strategy:**

**PY 1:** For individual boat wrap generators, CIFFRO will focus on education and outreach for individuals. CIFFRO will work through and with Community Partners to inform boat owners about the location of Collection Sites and best practices for removing and preparing boat wrap for recycling. These efforts will be designed to build awareness and encourage early adoption of recycling behaviors. Commercial boat wrap generators will be identified and contacted. If commercial boat wrap generators are not participating in the initial rollout, CIFFRO will provide these stakeholders with detailed information about the program and how they can become involved, laying the groundwork for future integration into the collection network.

**PY 2-5:** For individual boat wrap generators, the goal will be to normalize recycling as a routine part of seasonal boat storage. CIFFRO will work to expand the accessibility of Collection Sites, reduce contamination through targeted education, and gather

user feedback through surveys to continuously improve the program experience. Commercial boat wrap generators who express interest in participating will be supported through a structured onboarding process. CIFFRO will coordinate logistics and provide technical assistance to facilitate their transition into becoming a public or private Collection Site and ensuring seamless integration into the broader recycling network.

**Program Partner strategy:**

**PY 1:** Program Partners—including Collection Sites, Transporters, and Recyclers—will play a critical role in PY 1. CIFFRO will develop and distribute all necessary documentation, including SOPs, BMPs, and contractual agreements. Initial stakeholder engagement campaigns will be launched to communicate program material and gather first year feedback to use for the following year. Collection Sites will be equipped and trained to handle boat wrap properly and program staff will begin establishing logistics routes and protocols for material handling and contamination prevention for Transporters and Recyclers. Systems for tracking and reporting will also be initiated to support future program evaluation.

**PY 2-5:** Program Partners will see continued refinement of all operational documents and communication tools based on real-world experience and stakeholder input. The Collection Site network will be expanded strategically, guided by site determination criteria and program performance metrics outlined later in the plan. Transporters and Recyclers will benefit from the development of a program-specific order management tool designed to optimize routes and enhance data collection. CIFFRO will also work to expand the network of Recyclers by identifying and developing new end markets for recycled boat wrap materials.

**Community Partners strategy:**

**PY 1:** Community Partners will be instrumental in amplifying the Program’s message. CIFFRO will collaborate with local organizations to host events, share media resources, and identify barriers to participation. These insights will inform the development of inclusive and accessible solutions to ensure broad community engagement.

**PY 2-5:** Community Partners will continue to play a vital role in outreach and education. CIFFRO will grow its network of local collaborators and highlight success stories and community champions through shared media channels. These efforts will help sustain public interest and reinforce the program’s environmental and economic benefits.

## 3.4 Criteria for Choosing Program Partners

### Collection Site Determination

#### *Site Selection Criteria*

To ensure the WRR Program maintains a robust and effective collection network, the five criteria cited below will guide the prioritization and selection of Collection Sites for PY 1. For PY 2-5 Operational Experience will not be used for site selection but the Lake Size and Usage criterion will be adjusted as needed to focus on expanding the program to new sites and ensure growth. Key incentives CIFFRO will emphasize when recruiting potential Collection Sites include free storage, transport and recycling of boat wrap material and avoided or decreased disposal fees.

#### 1. **Operational Experience (PY 1 Only)**

Preference will be given to sites with a demonstrated history of managing boat wrap collection or recycling. These entities possess operational knowledge of material handling, contamination control, and logistics, which will be critical for ensuring early program success and establishing best practices for future expansion. Using operational experience as a site selection criterion will contribute to a more dependable and user-friendly collection network from the outset. PY 1 will focus exclusively on Collection Sites that are currently operational to ensure accurate tonnage forecasting.

#### 2. **Logistical Feasibility**

Collection Sites must be located within a reasonable proximity to consolidation, baling, or recycling infrastructure. This ensures that collected material can be efficiently transported and processed, minimizing environmental impact and supporting ongoing operational sustainability, particularly in rural or remote areas.

#### 3. **Interest-Driven Engagement**

Sites that have proactively expressed interest in participating will be prioritized. Voluntary engagement is essential in the absence of a landfill ban, and early adopters are more likely to champion the Program's goals and contribute to its long-term viability. Using this criterion will ensure Collection Site ownership and accountability, which is essential for ensuring that collection services remain accessible and responsive to community needs over time.

#### 4. **Boat Density**

Areas with an above-average number of state boat registrations will be prioritized to

maximize material recovery. This data-driven approach ensures that collection efforts are concentrated where the volume of boat wrap material is highest, thereby improving program efficiency and effectiveness. This maximizes convenience for the largest number of commercial and individual boat wrap generators and ensures that resources are allocated where they will have the most impact, thereby supporting an efficient and accessible collection system.

#### **5. Body of Water Size and Usage**

For this criterion, we are defining bodies of water as all lakes and substantial rivers that allow for recreational motor boating (the lower Mississippi and the lower St. Croix). The average recreational boat is recommended for use on a minimum of a 100-acre lake. While Minnesota is indeed the land of 10,000 lakes, many of these lakes are not suitable for recreational boating – with almost 30% of lakes being 25 acres or less.

Sites located in counties that contain bodies of water exceeding 5,000 acres will be considered high priority in PY 2, due to their likelihood of supporting larger boats that utilize higher volumes of shrink wrap. Over 27% of Minnesota counties meet this particular criterion. As the program grows, CIFFRO can adjust this criterion to add new Collection Sites in counties that may have many bodies of water, yet don't have ones that exceed 5,000 acres. Using the body of water size and usage criterion as one of the factors in Collection Site selection will ensure that collection infrastructure is placed where it is most needed, improving coverage and adequacy in high-use recreational boating areas of the state.

Together, these criteria form a strategic framework that balances geographic equity, operational readiness, and material recovery potential, ensuring that the collection system is both convenient for users and adequate to meet the Program's environmental and logistical goals.

#### ***Public Access, Convenience, and Equity***

To ensure the effectiveness and inclusivity of the statewide WRR Program, the plan will prioritize public access, convenience, and equity in the design and implementation of collection infrastructure and outreach. Together, these efforts will aim to reduce barriers to participation and promote statewide engagement in responsible boat wrap recycling.

#### **Public vs Private Collection Sites**

Public access will be supported through a geographically distributed network of Collection Sites, ensuring that residents across urban, suburban, and rural areas have reasonable opportunities to participate. Although the majority of boat wrap is removed by commercial operators, the plan recognizes the importance of equitable access for individual boat owners. Therefore, in each region where collection infrastructure is established, at least one site will be designated for public drop-off. These public drop-off sites will be clearly communicated through outreach and education efforts to ensure public awareness and participation. If it is learned that demand for public collection is higher than data is suggesting, CIFFRO will increase the number of public Collection Sites per region to meet those needs.

### **Convenience**

To meet the convenience requirement outlined in the Law, the program will prioritize accessibility, clarity, and seasonal alignment. Clear and consistent information on recycling procedures will be delivered through user-friendly tools such as maps, standardized signage, and visual infographics. Drop-off locations will be strategically established at marinas, boat dealerships, storage facilities, and public facing waste transfer stations—sites already frequented by boaters—to ensure ease of access.

The program will be operational during peak boat wrap removal periods (typically April through June), with logistical planning and outreach efforts tailored to these seasonal patterns. Stakeholder engagement showed minimal need for year-round collection service of boat wrap material since the majority (>90%) is generated during the peak boat wrap removal period (April – June). CIFFRO seeks to ensure collection containers are actively in use when deployed at a Collection Site. If a container sits empty for an extended period of time, it is not efficient for operations or logistics. If a Collection Site or community demonstrates a need for increased service throughout the year, including year-round, CIFFRO will provide this either through additional collection containers, mobile events or scheduled pick-ups at select Collection Sites. Additionally, drop-off locations will be made available during the off-season based on the needs of each area.

Collaboration with marina operators, local governments, and boating associations will support integration into existing workflows and promote widespread awareness. A dedicated website and user-friendly map will provide up-to-date drop-off locations, hours of operation, and preparation guidelines. Public education campaigns and modest incentives could be offered to further encourage participation and help normalize recycling behaviors across the boating community.

### **Equity**

*Rural vs Urban*

To ensure equitable access across diverse geographies, the Program has been intentionally designed to accommodate the unique needs of rural communities. Recognizing that traditional fixed-site collection models may not be feasible in less densely populated areas, flexible solutions will be explored such as mobile collection points and pop-up events in partnership with local organizations. These approaches will help bridge the accessibility gap and reduce travel burdens for rural residents. Notably, 50% of targeted Collection Sites for PY 1 are in rural counties, underscoring our commitment to inclusive participation and tailored service delivery across all regions.

Equity is a guiding principle in ensuring that all Minnesotans, including historically underserved communities and those with limited access to waste management services, can participate fully in the program. Developing culturally relevant outreach strategies, creating an equitable selection of collection infrastructure, and providing simple guidance on how to prepare and drop off boat wrap, including what materials are accepted and how to remove contaminants like straps or labels, will ensure that CIFFRO is serving Minnesota's diverse population in an equitable way.

### *Integration with Existing Infrastructure*

In compliance with the Law, the plan will actively consider and integrate these two Collection Site categories using the aforementioned site selection criteria:

- **Existing Marinas and Boat Storage Facilities**

These entities are often the primary generators of boat wrap material and are well-positioned to serve as Collection Sites.

- **Designated Recycling Centers**

CIFFRO shall contact facilities designated as recycling centers under the Law to inform them of the Program and solicit their participation as Collection Sites in accordance with CIFFRO's site selection criteria and operating standards. CIFFRO will work directly with MPCA to identify recycling facilities that could act as potential Collection Sites.

### *Collection Sites: PY 1*

#### **Operational Experience and Interest-Driven Engagement**

In PY 1, CIFFRO will prioritize Collection Sites with demonstrated operational experience combined with those that have shown interest-driven engagement with the program. These early partners will play a critical role in piloting best practices, informing program design, and building community trust to ensure program growth in subsequent years.

As an important note, Carlton County Zoning & Environmental Services, Cass County Environmental Service and Solid Waste, McLeod County Environmental Services, Pope Douglas Solid Waste Management, St Paul Yacht Club, Western Lake Superior Sanitary District, Willeys Marine, Brotex, Grant County Environmental Services, Clay County Solid Waste, and Sherburne County were included in the first plan submission but are not included in the below revised Potential Collection Sites for PY 1. Based on continued program research conducted after the first plan submittal, CIFFRO has determined these sites would be better suited to pursue in PY 2-5. Stakeholder conversations revealed that these entities do not currently manage an operational collection program and therefore do not meet the program Collection Site criteria for PY 1.

#### **Revised List of Potential PY 1 Collection Sites**

<b>Entity Name</b>	<b>County</b>	<b>Entity Type</b>	<b># Collection Sites</b>	<b>Lbs. recycled in 2024</b>	<b>Offer Public Collection Sites</b>	<b>Rural vs Urban Classification</b>
Scott County Environmental	Scott	Local government	3	14,000	YES	Urban
Dakota County	Dakota	Local government	3	8,720	NO	Urban
Carver County	Carver	Local government	8	7,800	YES	Urban
Becker County	Becker	Local government	2	54,920	YES	Rural
Otter Tail County Solid Waste	Otter Tail/Todd/Wadena	Local government	11	69,750	NO	Rural
The Boat Doctor	Washington	Shrink Wrapping Business	11	70,000	NO	Urban
Beltrami Solid Waste	Beltrami	Local government	TBD	18,000	NO	Rural
Hubbard County Solid Waste	Hubbard	Local government	TBD	24,000	YES	Rural

#### *Collection Sites: PY 2-5*

#### **Future Program Partners: Interest-Driven Engagement**



Below is a list of survey respondents who have expressed interest in becoming Program Partners and may align with our selection criteria. During PY 2-5, CIFFRO will continue to evaluate and pursue these potential partnerships, alongside others identified through our site selection criteria, ensuring progress toward Program goals.

### **Consolidator**

Brotex – Ramsey County

### **Local Government Potential Collection Site**

Carlton County Zoning & Environmental Services – Carlton County

Cass County Environmental Service and Solid Waste – Cass County

Clay County Solid Waste – Clay County

Grant County Environmental Services – Grant County

McLeod County Environmental Services – McLeod County

Pope Douglas Solid Waste Management – Pope and Douglas Counties

Sherburne County – Sherburne County

Western Lake Superior Sanitary District (Resource Renew) - St. Louis County, Duluth

### **Private Potential Collection Sites**

Lakehead Boat Basin, Inc.

Land O' Lake Marine

St Paul Yacht Club

Willeys Marine

### ***PY 1-5: Number of Collection Sites***

During PY 1-2, CIFFRO's primary focus will be on achieving a targeted volume of material collected (measured in pounds), while concurrently gathering data to estimate the percentage of boat wrap sold in or into the state. This foundational data will inform the establishment of a percentage-based collection goal, created in tandem with MPCA, which will be implemented in PY 3 and beyond.

### **PY 1-2**

***PY 1:*** Spring and Fall of 2026

Focus: Operational Experience and Interest-Driven Engagement

Collection Sites: Approximately 25-35 = 200,000 pounds collected and recycled

**PY 2:** Spring and Fall of 2027

Focus: Supporting PY 1 Program Partners and adding Collection Sites that have Interest-Driven Engagement and a high Logistic Feasibility score

Collection Sites: Approximately 30-50 = 400,000 pounds collected and recycled

**PY 3-5:** 2028-2030

Focus: CIFFRO will work in coordination with MPCA to determine appropriate collection targets for PY 3-5 based on the program performance in PY 1-2.

Transporter Determination

*Transporter Selection Criteria*

As mentioned in section 3.3, all WRR Program transporters must be willing to do the following to participate in the program:

- 1) Sign a vendor agreement with CIFFRO to participate in the WRR Program.
- 2) Provide proof of insurance, appropriate permits, certifications, and driver training.
- 3) Provide timely response to pick up requests through the WRR Program Coordinator or designated Collection Site contact person.
- 4) Upon request, provide proof of pickup and/or delivery via BOL or scale reports.

In addition to the above requirements, all transporters considered for the WRR Program will be based upon existing service provided to current operational Collection Sites. If a Collection Site has a strong preference for a specific transporter, CIFFRO seeks to maintain that relationship if it is efficient in terms of logistics and cost. It is the priority of the WRR Program to work with local vendors that are well established.

Recycler Determination

*Recycler Selection Criteria*

As mentioned in section 3.3, all WRR Program Recyclers must be willing to do the following to participate in the program:

- 1) Sign a vendor agreement with CIFFRO to participate in the WRR Program.
- 2) Provide proof of insurance, appropriate permits, certifications, and employee training.
- 3) Allow CIFFRO access to their facility for audits or site inspections.

- 4) Ensure that program material is weighed upon delivery to their facility and tracked through the recycling process.
- 5) Report weights received by BOL/pick up ID to CIFFRO on a monthly basis or more often upon mutual agreement.
- 6) Upon request, show proof of regrind or pelletized material being used in a remanufacturing process

In addition to the above requirements, all Recyclers considered for the WRR Program will be based upon existing service provided to current operational Collection Sites. If a Collection Site has a strong preference for a specific Recycler, CIFFRO seeks to maintain that relationship if it is efficient in terms of logistics and cost. It is the priority of the WRR Program to work with local vendors that are well established. Currently the following Recyclers are being considered:

Up North Plastics (Cottage Grove, Minnesota)  
GDB International (Rogers, Minnesota)  
Revolution Recycling (Arkansas)  
Trex Company (Virginia)  
Mondo Polymer Technologies (Ohio)

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.

### **3.5 Methods of Collection**

- 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.

- b. CIFFRO intends to integrate logistical support into the existing collection network during the WRR Program implementation in PY 1 (2026) by taking a multi-pronged operational approach. This will be done by focusing on existing boat wrap Collection Sites that are currently operational in Minnesota, all of which have a unique way of doing things.

See Appendix B See Appendix B for a full list of entities that are currently operational and will be folded into PY1 operations.

Of the PY1 sites listed, the following collection methods are currently being used:

- 1) Dumpster: a front load or roll off dumpster at an entity with high volumes of program material generation. The material is collected, consolidated, baled, and sent to the Recycler. In some cases, loose material is sent directly to the Recycler due to proximity.
  - a. Public Collection Site: A publicly accessible dumpster is hosted by the Collection Site (such as a marina or recycling center) that allows boat wrap generators to drop off program material.
  - b. Private Collection Site: A dumpster that is not open to the public is located at an entity that generates boat wrap material (such as a marina).
- 2) Enclosed semi-trailer: a 53 foot semi-trailer is temporarily dropped off at the Collection Site to allow high volume generators to fill the truck with loose wrap. This is typically done by commercial shrink wrappers or large marinas that remove boat wrap in house.
- 3) Recapture bags: 8 x 10 foot bags the boat wrap generator fills with program material and stored loose in a storage container at a public Collection Site. The Collection Site uses their labor to fill a box truck or semi-trailer of bags when ready for pick up.

CIFFRO intends to support the above operations and utilize them as the collection network expands during PY2 (2027) and beyond. By applying multiple approaches to collection, this ensures that the WRR Program can provide service to each Collection Site based on their specific logistical needs and operational capacity.

See section 3.4 for a full discussion of the Collection Site selection procedure and expansion strategy.

- c. To maximize operational efficiency, 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:

*Potential Pilot 1:* The utilization of a plastics baler at larger collection points or a consolidation point to minimize logistics costs and save space.

*Potential Pilot 2:* The utilization of temporary storage containers (e.g.: sea containers) to securely consolidate material via palletized gaylords at locations that do not have indoor storage available.

*Potential Pilot 3:* The utilization of open-top dumpsters and mobile compacting services to minimize logistics cost and save space.

*Potential Pilot 4:* The utilization of large plastic bags to consolidate small quantities of material with the aim of decreasing contamination.

### **3.6 Methods of Recycling and Handling Non-Recyclable Materials**

#### ***Recycle-Ready Boat Wrap Material***

Recycle-ready boat wrap material is boat wrap that is removed from boats after seasonal use that is free of contaminants. Recycle-ready boat wrap can include off-cuts from the boat wrap installation or removal process.

All generators of recycle-ready boat wrap material must remove all nylon strapping, vents, and other attachments from the boat wrap. The boat wrap material must be free of contaminants in order to be accepted by a recycling facility. The higher the percentage of contamination, the higher the risk of rejection by a recycling facility. Community and Program Partners can help alleviate the burden of contamination and support the success of the WRR Program through their assistance in informing and making sure boat wrap generators are prepared to participate in the program.

Recycle-ready boat wrap material must be accepted for drop off by WRR Program Partners at no cost to the generator. It is the responsibility of the boat wrap generator that is dropping off the material to properly prepare the material for recycling prior to drop off, but

ultimately the Collection Site will be held accountable for high levels of contamination at their Collection Site(s).

### ***Understanding Contamination***

There are two types of contamination: The first type are residual elements generated during the boat wrapping process that are required for boat storage (such as nylon strapping, adhesives, labels, vents, rivets, porthole and door zippers), but must be cut off and disposed of as solid waste when the wrap is removed from the boat. The second type of contamination is foreign matter found on boat wrap that was not part of the boat wrapping process or incidentally made its way into the collection container (such as dirt, moisture, non-program material).

### ***Preparing Material***

Properly prepping boat wrap material is crucial to ensuring that it can be effectively recycled. Cleaning the wrap of contaminants like dirt, sand, and moisture helps to prevent contamination of the recycling stream, which can reduce the quality and efficiency of the recycling process. Unwrapping a boat on a sunny day, and over a concrete or asphalt surface, can substantially reduce the presence of dirt, sand, and moisture. If contamination levels are too high in boat wrap material, this increases the risk of the entire load being disposed of as solid waste and not recycled. Removing non-recyclable components, such as nylon, tape and metal grommets and zippers, ensures that only suitable material is processed, minimizing waste and maximizing the amount of material that can be processed by a Recycler.

The following steps will be recommended to boat wrap generators as a step-by-step guide for the preparation and removal of boat wrap. See Appendix C for a more detailed example of a Collection Site SOP.

1. **Remove non-recyclable accessories** (such as doors, vents, zippers, portholes, and grommets) and dispose of them with regular trash. Save them for future use if removed carefully.
2. **Cut the shrink wrap horizontally** above the perimeter band using a shrink wrap knife, utility knife, or box cutter.
3. **Keep strapping separate**, as it is not recyclable.
4. **Ensure the wrap is clean** and free of excess dirt or moisture, as contaminated material is not recyclable.
5. **Roll up the shrink wrap** starting from the bow towards the stern, folding it into 4-5 foot sections for easier handling.
6. **Tie the bundle with a strip of shrink wrap**, avoiding the use of rope or non-recyclable strapping.

7. **Remove remaining accessories** (like buckles or support pole end caps) and save them for future use if possible.
8. **Place the rolled-up, recycle-ready boat wrap** into the designated collection container at your nearest recycling site, and dispose of non-shrink wrap materials (e.g., strapping, accessories) with regular trash.

### ***Removal***

The generator of boat wrap material is responsible for cutting off and removing the boat wrap from the boat. It is the generator's responsibility to separate and manage any non-recyclable components such as residuals or other types of contamination to ensure that these items are removed before the wrap is collected for recycling. As the Collection Site will be held accountable for high levels of contamination in their collection container, CIFFRO will provide ample training and public education tools to each Collection Site to ensure boat wrap generators properly prepare the boat wrap material for recycling.

### ***Contamination***

It is the responsibility of the boat wrap generator that is dropping off the material to properly prepare it for recycling prior to delivery, but ultimately the Collection Site will be held accountable for high levels of contamination being accepted. All generators of recycle-ready boat wrap material must remove residuals and other contamination such as all nylon strapping, vents, and other attachments from the boat wrap. Each Collection Site may, at their discretion, screen the material dropped off at their container to ensure no contamination is present. Any material that is not recycle-ready boat wrap material should be disposed of as solid waste. If a participating Collection Site consistently sends highly contaminated material to the CIFFRO contracted Recycler, the Collection Site will be evaluated and placed on an improvement plan (which may include additional staff training, webinars, public education tools, etc., provided by CIFFRO to decrease contamination issues).

To minimize illegal dumping and contamination, drop-offs done by appointment only will ensure boat wrap material generators are educated on how to properly prepare the material for recycling. If illegal dumping or high contamination is a problem, it will be recommended to secure and lock the designated collection container after hours. Ultimately, it is the Collection Site's responsibility to ensure the material received is recycle-ready boat wrap. If contamination or other logistical problems continue to be an issue, the Collection Site may be at risk of termination from this voluntary program.

### ***Material storage***

Each Collection Site will generate different weight volumes. To minimize logistics costs, it is important to choose the right dumpster size or collection container to support the expected tonnage received at each site. Collection Sites must keep program material clean and dry in the designated collection container. All pickup requests must go through the WRR Program Coordinator, and the collection container must be accessible when a pickup has been scheduled. Best practice strategies for boat wrap storage focus on reducing contamination and ensuring that the material is stored properly until it is transported for recycling. To minimize contamination, Collection Sites should implement clear signage that educates participants on how to properly prepare boat wrap, emphasizing the removal of non-recyclable components and ensuring the material is clean and dry.

Appointment-only drop-offs can help control the flow of material, providing staff oversight to monitor and guide the proper handling of boat wrap. While many Collection Sites will use dumpsters for storage, it's important to keep material as compact as possible to maximize space and weight of material collected per container.

### ***Transport***

The transporter's primary role is to ensure that the boat wrap material being picked up is acceptable for recycling and that it reaches the designated recycling facility. In terms of contamination, the transporter is responsible for inspecting the material before transport and rejecting any loads that contain incorrect or non-recyclable materials. If contamination levels are high or if a site consistently has issues with material quality, the transporter must inform the WRR Program Coordinator so they can address these issues and work with the Collection Site to improve their contamination rate. This ensures that only clean, recyclable boat wrap is processed, maintaining the efficiency and success of the Program.

### ***Material Tracking***

Material tracking will be handled by the WRR Program Coordinator to ensure that boat wrap material reaches the Recycler and that contamination levels are properly managed. Each load will be tracked as it is picked up and transported, documenting the weight of the material received at the recycling facility. Each pick up 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 a WRR Program Recycler.

The WRR Program coordinator will oversee pickup requests and maintain records of the materials' status, including the weight and originating site of each load. Transporters will communicate any loads with high contamination levels to the Program Coordinator, as these loads may be rejected upon arrival at the recycling facility. It's important to note that CFFRO will not track non-recyclable materials that are properly segregated and disposed of as solid waste at the Collection Site, as the focus is ensuring the recyclable material is



properly handled and processed. This tracking system helps maintain accountability and ensures that contamination issues are addressed promptly.

### ***Recycling & Non-recyclable Materials***

See section 6.0 (End Markets) for an in-depth discussion of the recycling process and potential end markets.

As mentioned elsewhere, WRR Program Recyclers will be required to document the weight of the Program material received at their recycling facility per load, any contamination present (including residuals), and the percentage of Program material that was able to be recycled. WRR Program 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).

Regarding non-recyclable materials, CIFFRO will seek solutions that allow for the recycling of non-LDPE materials and determine if end markets exist prior to the end of PY 1. If the non-LDPE material cannot be recycled, it will be sent to landfill. Opportunities for boat wrap reuse will continue to be evaluated, but stakeholder feedback has suggested that reuse applications are limited given that boat wrap is custom molded to each boat using heat, and the boat wrap must be cut during the removal process, causing it to lose its original shape.

Prior to the recycling process, recycling facility employees will manually remove any easily accessible "trash" found with the recycle-ready boat wrap material. 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.

Program Recyclers will be required to provide proof that any utilized waste disposal sites are properly permitted to manage the residue generated, and all Program recycling facilities will be audited annually to ensure compliance with the WRR Program requirements.

## **3.7 Public Education and Program Communication**

CIFFRO must conduct promotion and outreach activities that will be undertaken to encourage participation in the boat wrap collection and recycling programs commencing on approval of the plan. As part of these activities, CIFFRO will conduct outreach to potential participants after Plan approval to inform them at a minimum of the use, sale, and offer for sale prohibition date of September 1, 2025, for products of non-participating Producers, and the availability of participating and non-participating Producer information

on the MPCA website. All participants are subject to the Subdivision 3 requirements regarding the use and sale of boat wrap products from participating and non-participating Producers. If the Producer is not a CIFFRO member, no person may use, sell, or offer that Producer's boat wrap products for sale in or into the state.

### ***Informing, Educating and Engaging with Stakeholders***

A successful Extended Producer Responsibility (EPR) program for boat wrap recycling in Minnesota will depend on clear, consistent, and inclusive communication with all stakeholder groups. This section outlines CIFFRO's public education and Program communication strategy, designed to build awareness, promote compliance, and empower informed participation across the state.

CIFFRO's approach will be grounded in three core goals:

**Promote Compliance** – Equip all stakeholders with the knowledge they need to understand and meet regulatory requirements while accessing available recycling options.

**Increase Awareness** – Highlight boat wrap recycling as a practical and sustainable alternative to landfilling, helping Minnesotans see their role in protecting our natural resources.

**Provide Unbiased Information** – Offer transparent, accessible, and factual resources that support voluntary, informed decision-making.

CIFFRO's messaging voice will be transparent, educational, and empowering—encouraging Minnesotans to take pride in contributing to a cleaner, more sustainable state. We recognize that each stakeholder group plays a unique role in the success of this Program. From Producers and Retailers to local governments, Community Partners, and individual boat owners, our communication efforts will be tailored to meet the needs and motivations of each audience.

Through this plan, we aim to foster a shared sense of responsibility and collaboration, ensuring that every stakeholder has the tools and information needed to participate meaningfully in the WWR Program.

### ***Foundational Communication Assets***

In 2025, CIFFRO will be launching the WRR Program with core public education and communication assets to establish a strong foundation that we can build upon. These basic tools will allow us to build, manage, and disseminate future stakeholder communications and Program assets.

### **Program Name – Wrap Recycle Right**

Wrap Recycle Right (WRR) is a clear, memorable, and accessible Program name that will be the cornerstone of CIFFRO's public education efforts. It will serve as the brand identity of the initiative and will resonate with a broad audience—from individual boat owners to commercial entities and local governments. The name reflects the Program's purpose and values, making it easier for Minnesotans to recognize, trust, and engage with the recycling effort.

### **Program Logo**

The Program logo will visually represent the mission of boat wrap recycling in Minnesota. Designed to be simple, versatile, and recognizable, the logo will incorporate elements of boating and recycling to reinforce the Program's environmental focus. It will be developed in both color and black-and-white formats and made available in multiple sizes to support use across digital platforms, printed materials, signage, and operational documents. Launching the logo alongside the Program name ensures cohesive branding from the outset.

### **Program Website**

The Program website, [www.wraprecycleright.org](http://www.wraprecycleright.org), will serve as the central hub for WWR Program information, resources, and stakeholder engagement. A basic landing page will be launched with essential content, including an overview of the Program and a contact form for inquiries. Downloadable materials will be a future resource made available to different stakeholders. The site will also be equipped with analytics tools to track user engagement and demographics, helping to refine outreach strategies over time. This foundational web presence will be live by September 1, 2025, to support upcoming communications about the September 1, 2025 sales ban.

### **Producer Participation Materials**

To streamline onboarding and ensure clarity for Producers joining the Stewardship Organization, a set of participation materials will be developed. These will include a participation agreement, instructions for being added to the list of compliant Producers found on MPCA's website, and Program contact information. These materials will also outline the benefits and responsibilities of participation, helping Producers understand their role in the Program.

### **Press Releases**

A concise, informative press release will be created to announce the Program launch and the September 1, 2025 sales ban. It will highlight the environmental benefits of boat wrap recycling, direct readers to the Program website for more information, and provide contact details for follow-up. The September 1<sup>st</sup> press release will be reviewed in coordination with the MPCA and distributed to relevant media outlets and stakeholder networks. This

communication and future press releases will help raise public awareness and drive early and ongoing engagement with the Program.

### **Email Communication Tool**

To maintain consistent and targeted communication with varying stakeholder groups, an email communication platform will be selected and established. This tool will allow the Program to send updates, reminders, and educational content to Producers, Retailers, and Community Partners. It will also provide valuable analytics on open rates and engagement, helping to refine messaging strategies. A branded sender address and basic email templates will be created to ensure professional and recognizable outreach.

### **Program Tagline**

“Give your boat wrap a second life” is a short, memorable tagline that will be utilized to help reinforce the Program’s branding, mission and values in a way that’s easy to recall and share. This phrase can be used across marketing materials, signage, and digital content to create a unified message that connects the physical recycling requirements of this material with environmental stewardship. This tagline will enhance public recognition and participation in the Program.

### ***Targeted Stakeholder Communications and Key Information Needs***

CIFFRO will be creating, managing and disseminating public education and targeted communication to each stakeholder group outlined below.

Boat wrap contamination and its proper removal is recognized as a critical factor influencing the success of the Program and is addressed through both operational and social strategies. As an operational factor, contamination is directly impacted by the practices of boat wrap generators and Program Partners throughout each step in this Program. Its prevention and reduction depend on consistent adherence to SOPs, BMPs, and Program-specific handling requirements that will be communicated to all stakeholders. See Appendix C for an example Collection Site SOP. Proper training, clear guidance, and accountability mechanisms are essential to ensure that materials collected meet Recycler specifications.

As a social factor, contamination is influenced by the level of awareness and understanding among participants regarding what constitutes contamination and how to prevent it. Through targeted public education, stakeholder-specific guidance, and accessible SOPs and BMPs, the Program aims to build a culture of informed participation and shared responsibility, ultimately reducing contamination and improving material quality across the system.

**Producers** - *Businesses that make, import, distribute, and/or sell boat wrap in or into Minnesota*

Producers are central to the success of the WRR Program and will receive direct email communications outlining the sales ban, the importance of compliance, and the steps to join CIFFRO. Participation materials will clearly explain the benefits of membership, associated costs, and the responsibilities of being part of the stewardship organization. These materials will include a participation agreement, contact information for CIFFRO staff and board members, and guidance on how to be added to the list of compliant producers. This list will be linked from the MPCA's website to provide transparency and help downstream stakeholders identify compliant suppliers.

**Retailers** - *Entities that sell or offer boat wrap for sale in or into Minnesota*

Retailers will be informed via email about the sales ban and the legal requirements for selling boat wrap post-ban. Communications will include FAQs - addressing common concerns, such as the status of pre-ban inventory. A SOP will provide BMPs and outline the Retailer's role in ensuring that only compliant, recyclable materials are sold. Retailers will also be encouraged to reference the list of complaint producers to verify their suppliers and stay informed through ongoing updates.

**Commercial Boat Wrap Material Generators** - *Businesses that dispose of boat wrap material (e.g., shrink wrappers, marinas, boat storage facilities, etc.)*

These stakeholders will receive targeted email communications explaining the sales ban, legal purchasing guidelines, and the benefits of participating in the Program. SOPs will provide BMPs tailored to commercial operations, ensuring that collected material meets Recycler specifications. Training materials—including checklists, videos, and slide decks—will be developed for the various businesses interested in participating in the Program. Specific SOPs will be created for shrink wrappers, as they can be a large-volume generator, to support best practices for removal of recycle-ready boat wrap.

**Individual Boat Wrap Material Generators** - *Boat owners who dispose of their own boat wrap material*

Public-facing education for individuals will focus on accessibility and clarity. SOPs will outline simple BMPs for boat wrap removal and recycling, emphasizing the importance of clean, uncontaminated material. A user-friendly website map will show nearby collection points and participating businesses. Infographics and quick-reference guides will be developed to help individuals understand how and where to recycle their wrap, reinforcing the message that small personal actions contribute to a cleaner Minnesota.

**Community Partners** - *Any entity that is part of the boating, marine, environmental, waste management, or recycling community that is interested in promoting the Program. (e.g.,*

*cities, counties, DNR, watershed districts, lake associations, water advocacy groups, trade groups, general public, etc.)*

Community Partners will be key amplifiers of the Program’s message. They will receive newsletter articles and social media toolkits to help spread awareness and encourage participation. These materials will be designed for easy integration into existing communication channels. Partners will also be offered signage and flyers to display at events or public spaces, and the Program will explore opportunities to be featured in statewide recycling calendars and campaigns. Community Partners such as local government entities will also be provided with infographics and access to the public-facing Collection Site map, enabling them to direct residents to appropriate drop-off locations and promote the Program through their own communication channels.

**Program Partners** - *Entities involved in the recycling logistics chain (e.g., Collection Sites, Transporters, Recyclers, etc.)*

CIFFRO has identified the following as Program Partners that will require targeted information.

- Collection Site – with Public Drop-off
- Collection Site – Private
- Collection Site – Commercial Shrink Wrappers
- Transporter
- Recycler

Each Program Partner will receive a tailored SOP outlining their specific responsibilities and BMPs to ensure material quality and compliance. Collection sites—whether public, private, or operated by commercial shrink wrappers—will also receive signage to guide proper drop-off behavior and discourage contamination. All partners will be required to sign CIFFRO Collection Site agreements or vendor agreements, which provide clear guidelines and scope required of all parties participating in the WRR Program. These agreements will help establish accountability, reporting requirements and ensure consistent standards across the state.

### **3.8 Tracking and Evaluating Program Progress and Effectiveness**

#### ***Evaluation of Public Education and Stakeholder Communication: Targets Over Time***

To ensure the effectiveness of CIFFRO’s public education efforts for Minnesota’s WRR Program, CIFFRO will implement a multi-faceted evaluation strategy that measures

awareness, engagement, and behavior change across key stakeholder groups. These groups include Producers, Retailers, boat wrap generators, Program Partners, and Community Partners.

**Stakeholder Surveys** - These surveys will assess change in awareness, understanding of recycling procedures, willingness to participate in the Program, and any needed Program improvements. The data collected in these surveys will help the Program adjust logistics, messaging and outreach strategies for the initial two Program years. After the first two Program years, CIFFRO will evaluate the effectiveness of surveys in identifying Program improvements. These surveys will be sent to the following stakeholders:

- Retailers and Producers
- Boat wrap generators (individual and commercial)
- Program Partners (Collection Sites, Transporters, Recyclers)
- Community Partners

**TIMELINE:**

**PY 1:**

Winter/Early Spring: Build stakeholder-targeted surveys

Summer: Send out surveys to first year participating Program stakeholders listed above

Fall: Evaluate surveys for Program improvements to incorporate for PY 2.

Winter: Adjust SOPS, BMPs, website content, Program logistics, etc., to incorporate Program improvements.

**PY 2-5:**

Summer: Send out surveys to participating stakeholders listed above

Fall: Evaluate surveys for Program improvements to incorporate for PY 3.

Winter: Adjust SOPS, BMPs, website content, logistics, etc., to incorporate Program improvements.

**Website and Social Media Analytics** - This data will help CIFFRO understand which messages and formats are most effective. CIFFRO will track:

- Website traffic and time spent on educational pages
- Engagement metrics (likes, shares, comments) on social media posts
- Click-through rates on digital ads and email campaigns

## TIMELINE:

### **PY 1:**

CIFFRO will identify key website analytics to monitor, such as the number of visitors, time spent on educational pages, and bounce rates. Similar metrics will be established for digital advertising, social media, and email campaigns. These data points will be compiled into a quarterly report to track performance over time. Given the seasonal nature of the Program, the first year of data will serve as a baseline for future comparison.

### **PY 2-5:**

Quarterly analytics tracking will continue as an integral part of the public education strategy. After PY 2, CIFFRO can assess introducing new metrics and creating new drivers for online engagement, e.g.: more diverse links to website pages, broader social media shares, targeted email campaigns to increase the Program's reach through our digital communications.

**Collection Site Feedback** - This qualitative feedback will inform adjustments to messaging, materials, and logistics. Insights gathered will guide refinements to educational materials and campaign tactics in future seasons. Collectors will be asked to report:

- Common questions or misconceptions from the public
- Any observed changes in contamination rates resulting from public education

To ensure the long-term effectiveness and sustainability of boat wrap collection efforts, each site will undergo regular evaluation to assess its performance and suitability. This includes biennial site visits and Program Partner surveys to gather on-the-ground insights and identify any emerging contamination, logistical, or infrastructure challenges. To determine whether the site continues to serve its intended purpose efficiently and effectively for both individual and commercial boat wrap material generators, CIFFRO will use these key evaluation criteria:

- Contamination rates
- Collected volume trends over time
- Alignment with logistics modeling
- If issues such as high contamination, low participation, or access difficulties arise, adjustments will be made, such as evaluating and adjusting public



education materials, and increasing training and community engagement. CIFFRO will also consider relocating the site or modifying collection methods to maintain Program integrity and ensure material collected is able to be recycled.

**TIMELINE:**

**PY 1:**

Winter/Early Spring: Build Collection Site feedback framework with both digital, phone-based and in-person surveys

Summer: Deliver surveys to any first-year participating Collection Sites

Fall: Evaluate surveys for Program improvements to incorporate for PY 2.

Winter: Adjust SOPS, BMPs, website content, Program logistics, etc., to incorporate Program improvements.

**PY 2-5:**

Summer: Send out surveys to any participating Collection Sites

Fall: Evaluate surveys for Program improvements to incorporate for PY 3.

Winter: Adjust SOPS, BMPs, website content, logistics, etc., to incorporate Program improvements.

**Community Partner Input** - CIFFRO will host periodic check-ins or focus groups with local governments, lake associations, watershed districts, and advocacy groups to gather insights on:

- Public awareness (the effectiveness of public education campaigns on recycling)
- Public sentiment and barriers to participation
- New ways to collaborate
- Effectiveness of materials provided
- Suggestions for improving outreach
- Identification of underserved areas (areas requiring additional collections to be adequately serviced)

**TIMELINE:**

**PY 1:**

For each of the 2026 potential Collection Sites that offer public collection, CIFFRO will identify Community Partners that are connected by relationship and/or proximity. In the Spring, identified Community Partners will be utilized to promote the WRR Program with shared digital resources and targeted-in-person events to build both volume and awareness at these Collection Sites. Later in the year, CIFFRO will connect with those Community Partners for evaluation of messaging and connection to see what improvements can be made for the following Program year.

**PY 2-5:**

CIFFRO will continue to identify and grow Community Partners connected by relationship and/or proximity, for potential Collection Sites that offer public collection. In the Spring, the identified Community Partners will be utilized to promote the WRR Program with shared digital resources and targeted-in-person events to build both volume and awareness at these Collection Sites. Later in the year, CIFFRO will connect with those Community Partners for evaluation of messaging and connection to see what improvements can be made for the following Program year.

**Participation Metrics** - These metrics will help us evaluate long-term behavior change and Program growth. The following metrics will be monitored:

- Volume over time for Collection Sites and regions participating in the Program
- Geographic spread of participation across Minnesota
- Repeat Collection Site participation rates year-over-year

**TIMELINE:**

**PY 1:**

Using the above metrics, CIFFRO will track and monitor participation through volume generated per Collection Site, regional growth of the Program, and repeated versus new Collection Site participation rates. These data points will be compiled into a yearly report to track performance over time. Given the seasonal nature of the Program, the first year of data will be available in Q4 of 2026 and will serve as a baseline for future comparison.

**PY 2-5:**

CIFFRO will continue to track and monitor yearly participation metrics as an integral part of Program success. Given the seasonal nature of the Program, the second year of data will

be available in Q4 of 2027, which will serve as the first year over year metrics for the WRR Program.

### ***Operational Efficiencies at the Statewide Level***

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.

Data insights and collection efficiencies: To evaluate the following operational efficiencies, annual review of Program material tracking and tonnage data, combined with the public education surveys statewide will be used to determine the following (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
  - d. Community insights:
    - iii. Communities that generate the highest tonnages
    - iv. Communities in need of additional collection points/larger collection containers/more frequent pick ups
    - v. Communities that need additional public education or training to decrease the contamination rate/improve recycling rates
    - vi. Communities that need additional public education or training to efficiently pack the material into the collection container
    - vii. Operational approaches that result in the highest tonnage, cleanest material, and lowest complaints
    - viii. Communities that would benefit from on-call services to collect during a certain time of year

## TIMELINE:

### **PY 1**

Using the above metrics, CIFFRO will track and monitor environmental, operational, and social efficiencies based on data insights. These data points will be compiled into a yearly report to track performance over time. Given the seasonal nature of the Program, the first year of data will be available in Q4 of 2026 and will serve as a baseline for future comparison.

### **PY 2-5**

It is anticipated that CIFFRO will use the same metrics as established for PY 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 to determine if new metrics should be tracked moving forward.

*Plan Content Requirement: A stewardship plan must contain:*

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

## **4. 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 once available. Based on existing 2024 data on recycle-ready boat wrap material collected and recycled in Minnesota and the proposed Collection Sites and mechanisms for 2026 outlined in this Plan, CIFFRO proposes setting an interim weight-based performance goal for 2026 of 200,000 pounds collected. This figure is based on the expected Collection Site network performance in PY 1. Based on the proposed addition of new Program Collection Sites in 2027, CIFFRO proposes a weight-based performance target of 400,000 pounds collected.

- b. At the time of this submission, CIFFRO is still evaluating the total amount of boat wrap sold in or into the state; given that there are currently only two Producer members of CIFFRO who have shared their sales data, there is a gap in information needed to set percentage-based collection targets. In the interim, an analysis has been done on 2024 Minnesota boater registration data to forecast the potential amount of boat wrap used in the state based on boat size and type. That analysis forecasted approximately 3,340,000 pounds of boat wrap being used in Minnesota in 2024. With that in mind, the following variables exist and it is currently unclear how they may ultimately impact forecasted boat wrap material volumes:
  - a. percentage of boats actually being wrapped
  - b. wrapped boats purchased out-of-state and unwrapped in Minnesota
  - c. wrapped boats stored out-of-state and unwrapped in Minnesota
  - d. boats wrapped in Minnesota and unwrapped out-of-state
  - e. boats wrapped and unwrapped multiple times within the season
  - f. boats wrapped in Minnesota that are not registered
  - g. boats that are covered with reusable covers
- c. In addition to providing the MPCA with Program performance data in the annual reports for the purpose of establishing performance goals, CIFFRO will provide data to MPCA after the April-June collection seasons in 2026 and 2027 so that MPCA can establish performance goals in a timely manner with the most up-to-date information.
- d. CIFFRO will submit a plan amendment to MPCA for the purpose of incorporating performance goals established by the MPCA no more than 120 days after the performance goals are established.

*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;*

## **5. Insurance and Financial Assurance**

- a. CIFFRO must provide evidence of adequate insurance and financial assurance that may be required for collection, transport, reuse, recycling, and disposal operations. CIFFRO has included evidence of adequate insurance in Appendix D and provides an explanation of how CIFFRO

determined the coverage is adequate below. CIFFRO shall submit a plan amendment with evidence of adequate financial assurance no later than December 31, 2025, including an explanation of how CIFFRO determined the amount of financial assurance is adequate. The additional time will allow CIFFRO to gather necessary information and accurately establish its operational costs.

- b. CIFFRO has secured insurance coverage following a thorough evaluation of its environmental and operational risks, as well as the scope of WRR Program services—namely collection, transport, recycling, and disposal.

Coverage across key areas—including general liability, property, auto, professional liability, umbrella, environmental, and cyber—was selected to align with the organization’s revised operational plan and to meet applicable legal and regulatory standards. These lines of coverage and the limits for each were chosen in consultation with Johnson Kendall Johnson, a premier independent insurance brokerage and risk management firm, to ensure appropriate financial protection. A \$5 million umbrella policy limit was added to provide excess liability coverage beyond the primary policies.

CIFFRO has submitted a Certificate of Insurance (COI) to MPCA and it is included in Appendix D. CIFFRO will maintain or increase the coverages below as needed. If coverage decreases, CIFFRO will submit a plan amendment to the commissioner.

***Coverages maintained include:***

**Directors & Officers Policy (Travelers)**

**Commercial Package Policy (Philadelphia Indemnity Insurance Company)**

- Property Coverage: \$5,000 Business Personal Property
- General Liability: \$1,000,000/\$2,000,000 limits
- Commercial Auto: Hired and Non-Owned coverage
- Professional Liability: \$1,000,000/\$2,000,000 limits

**Commercial Umbrella (Philadelphia Indemnity Insurance Company)**

- Umbrella Limit: \$5,000,000 Each Occurrence Retained Limit: \$10,000

**Environmental Coverage (Tokio Marine Specialty Insurance Company)**

- Contracting Operations Environmental Liability: \$1,000,000/\$2,000,000
- Non-Owned Location Liability: \$1,000,000/\$2,000,000
- Self-Insured Retention: \$10,000 per incident

### **Cyber Liability (Coalition Insurance Solutions)**

- Aggregate Policy Limit: \$1,000,000
- Funds Transfer Fraud: \$250,000
- Retention: \$2,500

*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.*

## **6. End Markets**

### ***End Market Overview***

Boat wrap is composed of low-density polyethylene (LDPE) and holds significant potential to be recycled for various end-market applications. Like other flexible LDPE films, recycled boat wrap can be processed into valuable products, contributing meaningfully to the circular economy - Minnesota's circularity specifically.

Across the U.S., recycled LDPE film is primarily used to manufacture composite lumber (43%), film and sheet products such as garbage bags (37%), and other molded goods (20%) including containers, pallets, pipes, and playground components. These end uses represent a robust and growing market for recovered materials. While the specific end use of boat wrap collected through this Program cannot be pre-determined at this stage, CIFFRO is committed to ensuring that all recyclable, properly prepared boat wrap collected through the Program will be recycled and reintroduced into the marketplace as post-consumer recycled feedstock.

### ***Processing and Recycling Methods***

CIFFRO and its Program Partners will work exclusively with Recyclers utilizing mechanical recycling methods that comply with the statutory definition of recycling in Minnesota. No materials from this Program will be sent to facilities using chemical alteration, incineration, or other processes that fall outside the scope of statute-approved recycling methods.

The recycling process includes:

- **Dry Cleaning:** For relatively clean, mono material LDPE films, a dry mechanical process utilizing high-speed shearing can remove surface contaminants without water.
- **Wet Washing:** For materials requiring more intensive cleaning, a water-based process (sometimes using surfactants) will remove dirt, adhesives, paper, and other residues. Films are size-reduced, agitated in detergent solutions, then dried for reprocessing.

### ***Identification of Recycling Partners***

In alignment with the goals of minimizing environmental impact and strengthening local economies, preference will be given to in-state Recyclers wherever feasible. We have already engaged with the following Minnesota-based facilities willing to accept and process boat wrap:

- **Up North Plastics**, Cottage Grove, MN
- **GDB International**, Rogers, MN

To ensure processing capacity and long-term Program stability, we are also evaluating experienced **out-of-state recycling partners**, including:

- **Revolution Recycling**, Arkansas
- **Trex Company**, Virginia
- **Mondo Polymer Technologies**, Ohio

All participating Recyclers will be required to adhere to the Program's reporting requirements and industry standards.

### ***Potential End Markets***

Recycled boat wrap may be used in the production of:

- Composite decking and plastic lumber
- Trash bags and liners
- Shipping envelopes
- Outdoor furniture
- Industrial containers and crates
- Guard rail components



## ***Recyclable Material Grading***

Collected boat wrap is categorized according to standard LDPE film grades to facilitate proper sorting, processing and selling. In regards to this Program, recycle-ready boat wrap material would most likely fall under a Grade B or C product:

- **Grade A (Clear/Natural Film):** Clean, unprinted LDPE suitable for high-end film or pellet applications.
- **Grade B (Mixed Color Film):** Lightly printed or colored films used in lower-grade film or molded applications.
- **Grade C (Printed/Lightly Contaminated Film):** Films with logos or minimal tape residue; used in lower-spec applications like trash bags or decking.
- **Grade D (Heavily Contaminated or Mixed Plastics):** Material with significant contamination or mixed resins; limited marketability and may be downcycled or rejected.

Once washed and shredded, clean LDPE can be converted into regrind or pellets, which are marketable feedstocks for manufacturers producing a range of molded or extruded goods.

## ***Proper Handling and Minimizing Contamination***

Maintaining material quality is central to the success of the Program and the handling of this material is a critical quality control activity that ensures boat wrap material is properly prepared for recycling and meets the specifications required by end markets. This process includes the removal of contaminants such as strapping, zippers, and any non-compatible plastics, as well as sorting and compacting the material to optimize transportation and processing efficiency. Proper handling directly impacts the recyclability and marketability of the material, reducing the risk of rejection by downstream processors and increasing the likelihood of successful reintegration into new products. By establishing clear handling SOPs and training materials for boat wrap generators and Program Partners, the WRR Program will support a supply of high-quality, recycle-ready boat wrap material that aligns with the expectations of end markets and contributes to the overall success and growth of end markets.

Contamination reduces recyclability and ultimately end-market value. To mitigate this, the WRR Program website will soon include:

- Clear **SOPs** and **BMPs** for all handling partners
- Ongoing **training and technical support** for collection and processing partners
- **Targeted public education** campaigns aimed at boat wrap generators and Program Partners (such as marina operators, boat owners, and haulers)

Participants will be guided on proper material preparation, including:

- Waiting for dry weather to unwrap boats
- Unwrapping on hard surfaces (e.g., asphalt/concrete)
- Removing all non-LDPE materials: strapping, zippers, vents, ropes, framing, etc.

### **Market Viability and Growth**

The long-term success of this initiative depends on strong and diversified end markets. While 37% of recycled film currently returns to film-to-film applications, this number can grow with increased demand for post-consumer recycled (PCR) content. Greater market demand will support investment in advanced equipment capable of producing high-quality PCR, opening new applications, and reducing costs through scale.

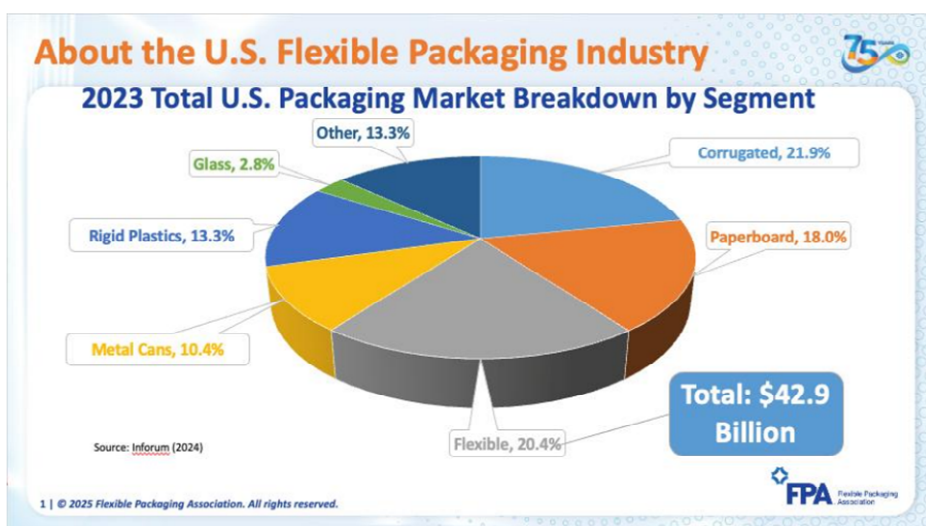


Figure 1: Flexible film industry makes up 20.4% of the total U.S. packaging market

The landscape for LDPE recycling is experiencing strong tailwinds that support Program expansion and long-term viability. First, the rising cost and limited capacity of landfills make diversion strategies like film recycling increasingly attractive from an economic standpoint. At the same time, growing corporate and consumer demand for sustainability is pushing brands and stakeholders to adopt circular solutions. Public sentiment is a powerful force—many boaters, marinas, and residents want to participate in programs that benefit the environment, especially when given clear and accessible pathways to do so. Furthermore, legislative momentum is building; Minnesota’s current EPR framework, along with similar laws being passed in other states, is accelerating investment in recycling

infrastructure and reinforcing the demand for post-consumer resin (PCR) in product manufacturing.

That said, the market does face certain headwinds. In recent years, the cost of virgin plastic has declined, which places downward pressure on the price of recycled LDPE and can make it harder for Recyclers to remain cost-competitive. However, this trend is cyclical—historically, virgin resin prices rebound sharply and unpredictably. Given that plastics are a high-volume, commodity-driven industry, building robust recycling systems and expanding end markets will position the WRR Program to capitalize on future growth and price stabilization. Investing in infrastructure now ensures the state is prepared to meet rising demand for recycled materials while delivering environmental and economic value over the long term.

Flexible packaging is one of the fastest-growing segments of the packaging industry and is now on par with the corrugated sector in size. Expanding recycling infrastructure for materials like boat wrap positions Minnesota to lead in sustainable materials management and fulfill the objectives of its EPR legislation.

## 7. Stakeholder Consultation

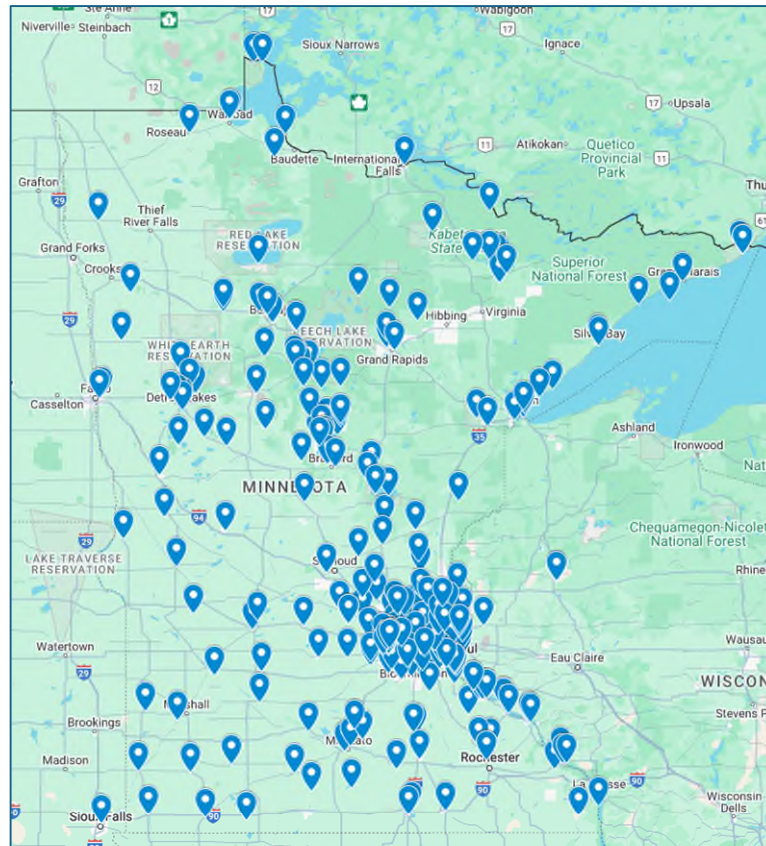
### *Subd. 6. Consultation required.*

*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, and since that time substantial engagement has occurred with those who completed the survey to ensure CIFFRO will be able to recruit enough collection partners to ultimately support a broad array of Collection Sites in PY 1 and then ultimately a convenient statewide boat wrap collection infrastructure in 2027 and onward.

## 8. Plan Amendments

### *Subd. 7. (b) Plan Amendments.*

*Commissioner approval of a written plan amendment is required before a Stewardship Organization may make any change to an approved plan or its implementation. A proposed plan amendment must be submitted to the Commissioner for review and approval or rejection according to paragraph (a) and subdivision 8.*

CIFFRO must submit a written plan amendment to the Commissioner to make any change to an approved plan or its implementation. Minn. Stat. § 115A.1416, subd. 12 (b) requires the Stewardship Organization to submit a proposed plan amendment to incorporate performance goals established by the Commissioner. Minn. Stat. § 115A.1416, subd. 16 (5) requires the Stewardship Organization to propose modifications to the collection Program the Stewardship Organization will implement if the Stewardship Organization does not meet performance goals.

Proposed plan amendments are subject to Commissioner review and approval pursuant to Subdivision 7 and must be made available for public review and comment pursuant to Subdivision 8.”

## 9. Annual Reports

### *Subd. 16. Stewardship reports.*

*Beginning March 1, 2026, and each March 1 thereafter, a Stewardship Organization operating under this section must submit an annual report to the Commissioner describing the program operations of the stewardship plan during the previous calendar year.*

Beginning March 1, 2026, and each March 1 thereafter, CIFFRO must submit an annual report to the Commissioner describing the Program operations of the stewardship plan during the previous calendar year. The report must meet the requirements of Minn. Stat. § 115A.1416, subd. 16. In each annual report, CIFFRO must report on and evaluate the performance of the Program against the performance goals established in Minn. Stat. § 115A.1416, subd. 12 (c) and against the performance goals established by the MPCA according to Minn. Stat. § 115A.1416, subd. 12 (b).

In addition, the annual report must describe the Program operations of the stewardship plan during the previous calendar year by providing Program implementation and performance updates for each planning element in Minn. Stat. § 115A.1416, subd. 5. If performance goals are not met, CIFFRO must include a discussion of why the performance goals were not met and proposed modifications to the Program that CIFFRO will implement to ensure that future performance goals will be met. Proposed modifications to the Program will require CIFFRO to submit a plan amendment that is subject to Minn. Stat. § 115A.1416, subs. 7 (b) and 8.”



# 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](mailto: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

## APPENDIX B

### Collector, Transporter, Reuse Facility and Recycler Names

Through the stakeholder consultation in early 2025, CIFFRO connected with many existing 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.

#### Revised List of Potential PY 1 Collection Sites

Entity Name	County	Entity Type	# Collection Sites	Lbs. recycled in 2024	Offer Public Collection Sites	Rural vs Urban Classification
Scott County Environmental	Scott	Local government	3	14,000	YES	Urban
Dakota County	Dakota	Local government	3	8,720	NO	Urban
Carver County	Carver	Local government	8	7,800	YES	Urban
Becker County	Becker	Local government	2	54,920	YES	Rural
Otter Tail County Solid Waste	Otter Tail/Todd/Wa dena	Local government	11	69,750	NO	Rural
The Boat Doctor	Washington	Shrink Wrapping Business	11	70,000	NO	Urban
Beltrami Solid Waste	Beltrami	Local government	TBD	18,000	NO	Rural
Hubbard County Solid Waste	Hubbard	Local government	TBD	24,000	YES	Rural

#### ***Future Collection Sites:***

Below is a list of survey respondents who have expressed interest in becoming Program Partners and may align with our selection criteria. During PY 2-5, CIFFRO will continue to evaluate and pursue these potential partnerships, alongside others identified through our site selection criteria, ensuring progress toward meeting program goals.

***Consolidator***

Brotex – Ramsey County

***Local Government Potential Collection Site***

Carlton County Zoning & Environmental Services – Carlton County

Cass County Environmental Service and Solid Waste – Cass County

Clay County Solid Waste – Clay County

Grant County Environmental Services – Grant County

McLeod County Environmental Services – McLeod County

Pope Douglas Solid Waste Management – Pope and Douglas Counties

Sherburne County – Sherburne County

Western Lake Superior Sanitary District (Resource Renew) - St. Louis County, Duluth

***Private Potential Collection Sites***

Lakehead Boat Basin, Inc.

Land O’ Lake Marine

St Paul Yacht Club

Willeys Marine

***Transporters***

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.

***Recyclers***

CIFFRO will require all WRR Program recyclers to adhere to their vendor contract, Program requirements, and industry standards. Below are potential recyclers that may be included in the WRR Program.

Up North Plastics, Cottage Grove, MN

GDB International, Rogers, MN

Revolution Recycling, Arkansas

Trex Company, Virginia

Mondo Polymer Technologies, Ohio

## APPENDIX C

### Wrap Recycle Right Program: Collection Site SOP [Draft – v1.0]

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## About the Requirements

Staff at all participating collections sites must be knowledgeable regarding these requirements before accepting boat wrap material. For purposes of these requirements, the term “boat wrap” is defined as it is in Minn. Stat. § 115A.1146 and is included in the Terminology section below. These requirements describe the program and what is required to participate.

## About the Commercial and Industrial Flexible Film Recycling Organization (CIFFRO)

Minn. Stat. § 115A.1146 requires boat wrap Producers to create a collection and recycling program for boat wrap discarded in the state. The boat wrap industry established the Commercial and Industrial Flexible Film Recycling Organization (CIFFRO) in 2025 to develop and operate the required boat wrap recycling program known as Wrap Recycle Right WRR.

## What CIFFRO Provides

CIFFRO provides the following to participating collection sites through the WRR Program:

- **Public Education:** CIFFRO will provide public education to boat wrap generators on the proper method to prepare boat wrap material for recycling. A public education toolkit and other resources are available online to educate the local boating community.
- **Collection Site Training Materials:** CIFFRO will provide SOPs tailored to commercial operations, ensuring that collected material will meet recycler specifications. Training materials—including checklists, videos, and slide decks will be made available to all Collectors.
- **Collection:** CIFFRO will provide a container to collect and store recycle-ready boat wrap material that is appropriate for the site, sized for the expected volume a collection site generates, and meets program efficiency metrics.
- **Transportation:** CIFFRO will provide transportation from the collection site to a contracted recycler or consolidator.
- **Recycling:** CIFFRO will provide free boat wrap recycling services
- **Evaluation and Reporting:** As part of the WRR Program, CIFFRO will be gathering annual feedback from Collectors on the Program and its logistics. It will also report weight recycled to the Collector on an annual basis.

## Terminology

**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.

**Boat Wrap Material** means any used, discarded, or no longer serviceable plastic material originally intended for wrapping boats to protect them during storage.

**Collection and Storage Container Types** means containers that CIFFRO may consider viable for Collection Site usage. Container types include but are not limited to dumpsters, enclosed semi-trailers, storage containers, and recapture bags.

**Collection Site** means a public or private site that collects boat wrap material from individual and/or commercial boat wrap generators. This includes but is not limited to, recycling centers, material recovery facilities (MRFs), transfer stations, boat marinas, boat dealers, boat storage facilities, etc. Sites can be "participating collection sites" if currently in the Program, or "potential collection sites" if they have expressed an interest in participating in the Program.

**Collector** means any Program Partner that operates a collection site.

**Contamination or Contaminants** means foreign matter found on boat wrap or added to boat wrap that may prohibit recycling such as dirt, excessive moisture, adhesives, labels, tape, paint or minor non-recyclable attachments (ex: vents, rivets, porthole and door zippers).

**Handling** means preparing boat wrap material to be recycle-ready.

**Methods of Collection** means mechanisms utilized to collect recycle-ready boat wrap material including but not limited to dumpsters, enclosed semi-trailers, storage containers, and recapture bags.

**Non-Program Material** means any plastic film-like materials that would not be considered boat wrap material such as agricultural film, plastic grocery or take away bags, plastic trash bags, plastic tarps, boat wrap material generated out-of-state, or trash.

**Program Material** means recycle-ready boat wrap.

**Program Partner** means a collector, collection site, transporter, recycler or any other entity that has entered into a participation agreement with CIFFRO to act as part of the Program collection and recycling infrastructure for boat wrap in Minnesota.

**Recycle or Recycling** is defined in the Law as 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.

**Recycle-ready boat wrap material** means boat wrap removed from boats after seasonal use that is free of contaminants. Recycle-Ready Boat Wrap can include off-cuts from installation or removal processes.

**Recycler** means any recycling business that can recycle recycle-ready boat wrap material by adhering to the definition of recycling as defined in in this plan.

**Self-Hauler** means an individual or commercial boat wrap generator that chooses to self-haul their recycle-ready boat wrap material to a collection site.

**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.

**Transport** means the movement of recycle-ready boat wrap material from Program collection sites through the recycling process, including sorting, processing, and or final disposition at an end-of-life destination. Program transport will ensure recycle-ready boat wrap material is efficiently and responsibly moved within the Program recycling system.

**Transporter** means an insured Program Partner that safely and securely moves recycle-ready boat wrap material from collection *and/or consolidation sites, through to the end-of-life destination.*

# Incoming Materials

## Included Products

As defined in in Minn. Stat. § 115A.1146 and CIFFRO's Minnesota Program Plan:

### Boat wrap:

Defined as 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.



## Excluded from free drop-off (non-program products)

Participating collection sites must allow free drop-off of recycle-ready boat wrap material. If boat wrap material contains any of the below items, it is not considered recycle-ready boat wrap material.

As defined in Minn. Stat. § 115A.1146 and the WRR Program for Minnesota, these products are excluded from the definition of boat wrap:

- Boat wrap material that has any additional elements still attached, including nylon strapping, rivets, zippers, vents, rope, portholes, doors, paint, etc.
- Boat wrap material that is severely wet/moldy or soiled.
- Agricultural film
- Plastic grocery bags/takeaway bags
- Out-of-state boat wrap
- Tarps
- Blankets
- Trash or other non-program material



Description: Nylon strapping and wood

# Material Drop-Off

All recycle-ready boat wrap material must be accepted for drop off at no cost. It is the responsibility of the boat wrap generator that is dropping off the material to properly prepare the material for recycling prior to drop off, but ultimately the collection site will be held accountable for high levels of contamination.

All generators of recycle-ready boat wrap material must remove all nylon strapping, vents, and other attachments from the boat wrap. See Appendix 1 below for a step-by-step guide on preparing boat wrap material for recycling.

**IMPORTANT:** Each collection site may, at their discretion, screen the material dropped off at their container to ensure no contamination is present. Any material that is not recycle-ready boat wrap material should be disposed of as solid waste. If a participating collection site consistently sends highly contaminated material to the CIFFRO contracted recycler, the collection site will be evaluated and placed on an improvement plan (which may include additional staff training, webinars, public education tools, etc. provided by the WRR Program) to decrease contamination issues. Ultimately, it is the collection site's responsibility that the material the recycler receives is recycle-ready boat wrap material. If contamination or other logistical problems continue to be an issue, the collection site may be at risk for termination from this voluntary program.

## Best Practices

**Public education:** Educating boat wrap generators on the proper method to prepare the boat wrap material for recycling is key to the success of the program. WRR will provide collection sites with a public education toolkit, including press releases, social media posts, and other resources to educate the local community.

**Generator drop off:** To minimize illegal dumping and contamination, drop-offs done by appointment-only ensure the boat wrap material generator is educated on how to properly prepare the material for recycling. If illegal dumping or high contamination is a problem, it is recommended to secure and lock the designated collection container after hours.

**Material Segregation:** To ensure proper recycling can be achieved, boat wrap should be sorted at the collection site into recyclable and non-recyclable material. The generator should remove any contaminants, such as vents, doors, zippers, strapping, rope, metal grommets, wood, or debris and dispose of as solid waste.

**Choosing appropriate collection containers:** Each site will have different tonnages, and to minimize logistics costs it is important to choose the right dumpster size to support the expected tonnage received.

A training video focused on best practices for collection site staff can be found here:  
[www.wraprecycleright.org](http://www.wraprecycleright.org)

# Material Collection & Handling

Each collection site will have unique operational considerations. Participating sites must make their own decisions about how to best manage their operations in the safest manner possible in accordance with applicable local, state and federal laws. At a minimum, each participating site must meet these requirements:

<b>Minimum Collection Site Requirements</b>	
<b>Site</b>	Each collection site must be secure with adequate space and staffing to handle and store all program material received. To be considered a public collection site, the location of the WRR collection container must be readily accessible to the public either through posted hours or via appointment only.
<b>Permits</b>	Each collection site must have knowledge of and comply with all applicable federal, state and local laws. These may include, but are not limited to, zoning requirements, state permit requirements and OSHA or other workplace requirements.
<b>Insurance</b>	Each collection site must maintain general liability insurance.
<b>Training</b>	Staff at each collection site must be trained and knowledgeable on all participation requirements before accepting and collecting recycle-ready boat wrap material.
<b>Storage &amp; pickup request</b>	Collection sites must keep program material clean and dry in the designated collection container. All pickup requests must go through the WRR Program Coordinator and the collection container must be accessible when a pickup has been scheduled.
<b>Site access</b>	Collection sites must allow WRR access to confirm compliance with these requirements

# Material Collection & Handling: examples

## Loading recycle-ready boat wrap into WRR collection containers

WRR can provide a dumpster or semi-trailer depending on the collection sites' capacity and volume. See below for estimates regarding the volume each container type can hold.

Dumpster size (cu yd)	Capacity (lbs. boat wrap)	~ Number of 20' boats
8	672	30
10	840	40
20	1680	80
40	3360	160

*\*Average dumpster can fit ~84 lbs. of loose boat wrap/cu yd*

Semi-trailer size (feet)	Capacity (lbs. boat wrap)	~ Number of 20' boats
28	6500	300
45	10,500	500
53	11,500	575

## Acceptable storage methods:

*[To be added: picture 1 of rolled wrap in dumpster]*

*[To be added: picture 2 of wrap in semi-trailer]*

## Unacceptable storage methods:

Please contact your Program Coordinator to learn more about acceptable/non-acceptable material and appropriate storage techniques.

*[To be added: picture 1 showing overflowing dumpster]*

*[To be added: picture 2 showing dumpster with contamination inside]*



# Transportation & Recycling

Collection sites, transporters and recyclers must contact their Program Coordinator to request pickups, manage cancellations, coordinate deliveries and report issues and data to WRR.

## Transporters

WRR will assign each collection site a transporter to provide a collection container and transport services.

- Upon request, WRR-contracted transporters will provide participating locations with evidence of automobile insurance coverage of at least \$1,000,000 per occurrence.
- Upon request, the assigned transporter will pick up full dumpsters and drop off an empty dumpster at the same time.
- On the scheduled pickup day, the collection site must make the collection container readily accessible to the transporter.

A collection site may choose to provide its own storage containers and transportation. Such locations may only send recycle-ready boat wrap material to recyclers contracted by WRR and participating in the Program, and must schedule a drop-off time with the recycler through WRR's Program Coordinator.

## Recyclers

Recyclers under contract with WRR will meet environmentally sound management requirements and established recycling standards to accurately account for all recycle-ready boat wrap material received by their facility. Collection sites will be assigned a WRR recycler to best service them.

# Environmentally Sound Management

WRR's contracts require that program participants use environmentally sound management practices to collect, transport and recycle discarded units. For collection sites, required environmentally sound management practices include:

- Maintaining adequate record keeping. Program participants are required to maintain records related to implementation of the Program for not less than three years.
- Tracking and documenting the fate of discarded boat wrap from collection through final disposition within and outside Minnesota.
- Complying with all federal, state and local laws and regulations that apply to their business and operations, including air and water pollution laws, other environmental laws, worker health and safety requirements, fair labor standards rules and other laws that can affect the work and natural environment.
- Maintaining adequate liability insurance.

## Program Withdrawal or Termination

A collection site's participation in CIFFRO's Wrap Recycle Right program in Minnesota is voluntary. Either party may withdraw from participation in accordance with the terms in your contract. Written notice to the other party is required. CIFFRO reserves the right to remove any collection site not in compliance with these requirements from further participation in the program.

# Appendix 1: Preparing Boat Wrap for Recycling

## Tip for Success:

*Unwrap boat on a dry, sunny day with concrete or asphalt beneath it.*

## Step-by-Step Guide:

1. **While still on boat, remove all accessories** such as doors, vents, zippers, portholes, and grommets (anything that is not shrink wrap material). These can be saved for future use if removed carefully; they are not recyclable and should be disposed of with regular trash. It is fastest to remove all accessories prior to removing the shrink wrap from the boat.
2. **While still on boat, cut shrink wrap horizontally above the perimeter band.** It is recommended to use a shrink wrap knife to reduce the risk of damaging the boat, but a utility knife or box cutter will also work. Keep any strapping separate from the shrink wrap since it is not recyclable. Any excessively dirty or wet shrink wrap is not recyclable, so be mindful of that when removing it from the boat.
3. **Roll up the shrink wrap** by starting at the bow, working towards the stern. Depending on the size of the boat, it may be easier to slice the wrap into long sections and roll up once on the ground. Fold into 4-5 foot widths before rolling up like a sleeping bag. Use a strip of shrink wrap to tie up the bundle to keep it compact (never use rope or strapping since it cannot be recycled).
4. **Remove any remaining accessories or bands.** Buckles and support pole end caps can be saved for future use if removed carefully. Nylon strapping should be disposed of with regular trash.
5. **Recycle wrap right!** Place the rolled up recycle-ready boat wrap material into the designated Wrap Recycle Right collection container at your nearest boat wrap collection site. Anything that is not plastic film, such as accessories, strapping or bands, is not recyclable and should be disposed of with regular trash.

Questions? Visit [www.wraprecycleright.org](http://www.wraprecycleright.org) for FAQs, video tutorials, and collection sites.

Thank you for helping to keep Minnesota waterways clean!

## APPENDIX D



THECOMM-02

TMOONEY

## CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

8/15/2025

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT:** If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Johnson, Kendall & Johnson, Inc. 109 Pheasant Run Newtown, PA 18940	CONTACT NAME:		
	PHONE (A/C, No, Ext): (215) 968-4741	FAX (A/C, No): (215) 968-0973	
	E-MAIL ADDRESS: info@jkj.com		
	INSURER(S) AFFORDING COVERAGE	NAIC #	
	INSURER A : Philadelphia Indemnity Insurance Company	18058	
INSURED  The Commercial and Industrial Flexible Film Recycling Organization (CIFFRO) 135 Sommerville St S Shakopee, MN 55379-1498	INSURER B : Tokio Marine Specialty Insurance Co.	23850	
	INSURER C :		
	INSURER D :		
	INSURER E :		
	INSURER F :		

## COVERAGES

## CERTIFICATE NUMBER:

## REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR  GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC OTHER:			PHPK2720371-000	9/1/2025	9/1/2026	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 100,000 MED EXP (Any one person) \$ 5,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 1,000,000 \$
A	<input checked="" type="checkbox"/> AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input checked="" type="checkbox"/> HIRED AUTOS ONLY <input checked="" type="checkbox"/> NON-OWNED AUTOS ONLY			PHPK2720371-000	9/1/2025	9/1/2026	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
A	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED <input checked="" type="checkbox"/> RETENTION \$ 10,000			PHUB922254-000	9/1/2025	9/1/2026	EACH OCCURRENCE \$ 5,000,000 AGGREGATE \$ 5,000,000 \$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) <input type="checkbox"/> Y / N If yes, describe under DESCRIPTION OF OPERATIONS below		N / A				PER STATUTE <input type="checkbox"/> OTH-ER <input type="checkbox"/> E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$
B	Pollution Liability			PPK2720537-000	9/1/2025	9/1/2026	Occurrence 1,000,000
B	Pollution Liability			PPK2720537-000	9/1/2025	9/1/2026	Aggregate 2,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Cyber Policy with Coalition #C-4MMW-062145-CYBER-2025

eff. 9/1/25 - 9/1/26

Aggregate: \$1,000,000

Directors &amp; Officers with Travelers #108330110

eff. 9/1/25 - 9/1/26

Aggregate: \$1,000,000

SEE ATTACHED ACORD 101

## CERTIFICATE HOLDER

## CANCELLATION

Evidence of Insurance

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

**ADDITIONAL REMARKS SCHEDULE**

AGENCY <b>Johnson, Kendall &amp; Johnson, Inc.</b>		NAMED INSURED <b>The Commercial and Industrial Flexible Film Recycling Organization (CIFFRO)</b> <b>135 Sommerville St S</b> <b>Shakopee, MN 55379-1498</b> <b>Scott</b>
POLICY NUMBER <b>SEE PAGE 1</b>		
CARRIER <b>SEE PAGE 1</b>	NAIC CODE <b>SEE P 1</b>	EFFECTIVE DATE: <b>SEE PAGE 1</b>

**ADDITIONAL REMARKS**

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,  
FORM NUMBER: ACORD 25 FORM TITLE: Certificate of Liability Insurance

Description of Operations/Locations/Vehicles:  
Professional Liability with Philadelphia #PHPK2720371-000  
eff. 9/1/25 - 9/1/26  
Per Occurrence: \$1,000,000  
Aggregate: \$2,000,000