

August 29, 2025

VIA EMAIL

Commercial and Institutional Flexible Film Recycling Organization (CIFFRO)  
Kelsey Pigneri, Chairman  
2000 W Marshall Dr  
Grand Prairie, TX 75051

Dear Kelsey Pigneri:

The Minnesota Pollution Control Agency (MPCA) has reviewed the revised proposed Minnesota Boat Wrap Stewardship Plan developed pursuant to Minn. Stat. § 115A.1416 and submitted by CIFFRO on August 27, 2025. Previously, a draft boat wrap stewardship plan was received by the MPCA on March 3, 2025. The MPCA sent a response to CIFFRO on July 1, 2025, rejecting the draft plan and identifying changes needed. This letter serves as the MPCA's official approval of the revised boat wrap stewardship plan submitted by CIFFRO and dated August 27, 2025.

As noted in the plan, CIFFRO will submit a plan amendment with evidence of adequate financial assurance to the agency 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.

The commissioner must make an approved stewardship plan available on the agency website. This response and the approved stewardship plan will be posted to the agency's website <https://www.pca.state.mn.us/air-water-land-climate/boat-wrap-stewardship-program>.

The MPCA acknowledges the effort that CIFFRO has taken to incorporate the requested changes and towards developing a sustainable program. We look forward to continuing to foster a collaborative partnership throughout the plan implementation.

Please contact [boatwrap.mPCA@state.mn.us](mailto:boatwrap.mPCA@state.mn.us) or Molly Flynn at [molly.a.flynn@state.mn.us](mailto:molly.a.flynn@state.mn.us) of my staff for further information or if you have questions about this letter.

Sincerely,



Kirk Koudelka  
Assistant Commissioner  
Commissioner's Office

KK/MF:rjm

cc: Brandon Lee, Treasurer, CIFFRO (electronic)  
Michael Stenberg, Secretary, CIFFRO (electronic)  
Andriana Kontovrakis, Reverse Logistics Group (electronic)