

Chair Fong Hawj
Minnesota Senate Environment, Climate, and Legacy Committee
Room 1150 Minnesota Senate Building
St. Paul, MN 55155

RE: Concern Regarding SF 1690 – Stewardship Program for Circuit Boards, Batteries, and Electrical Products

Dear Chair Hawj, Ranking Minority Member Green and Members of the Senate Environment Committee,

The National Marine Manufacturers Association (NMMA) appreciates the opportunity to comment on SF 1690, which seeks to establish a stewardship program for circuit boards, batteries, and electrical products. While we support the goal of environmental stewardship and share the commitment to reducing pollution in marine ecosystems, as written, SF 1690 would impose an unworkable compliance burden on marine manufacturers, many of which are small, family-owned businesses.

NMMA is the trade association for the U.S. recreational boating industry, representing nearly 1,300 marine businesses, including recreational boat, marine engine, and accessory manufacturers. Our members are primarily U.S.-based small businesses, many of which are family owned. NMMA members collectively manufacture more than 85 percent of the marine products sold in the U.S. Recreational boating is uniquely American in that 95% of recreational boats sold in the U.S. are made in the U.S. Furthermore, the recreational boating industry has a \$230 billion impact on the nation's economy, with 812,000 American jobs across 36,000 U.S.-based marine businesses in communities throughout the country.

We believe SF 1690 will have unintended consequences for the boating industry **and therefore request an amendment to exempt watercraft due to the various types of batteries used in safe boating operations.**

NMMA respectfully requests this amendment for the following reasons:

- **Alignment of watercraft with motor vehicles.** Just as motor vehicles are treated as a distinct category given their unique operational requirements, watercraft warrant the same consideration. Exempting watercraft restores alignment with the earlier version of this legislation and ensures a targeted, practical approach.
- **Diverse battery chemistries and uses beyond lead-acid.** In addition to lead-acid batteries already exempted under Sec. 3, line 2.26, marine vessels rely on lithium-ion, and dual-purpose batteries for propulsion, trolling motors, and onboard electronics. A one-size-fits-all stewardship framework is unworkable for this range of products.
- **Risk of confusion for manufacturers.** Marine products involve complex, application-specific battery configurations that do not map cleanly onto this framework, creating uncertainty for manufacturers, particularly small and family-owned businesses, around compliance obligations and program participation.

SF 1690 aims to replace Minnesota's current recycling program with a more expansive extended producer responsibility framework that covers products beyond traditional electronics. This significant shift would introduce unnecessary complexity and costs for marine businesses. **Given these concerns, the NMMA urges the committee to amend this legislation to exempt watercraft and return to an earlier version of the bill that aligns watercraft with motor vehicles.** While we support environmental protection, we believe a more targeted and practical solution is needed.

We look forward to engaging in constructive dialogue to find a balanced way forward. For any questions, please contact lhyland@nmma.org.

Sincerely,

Lauren Hyland
Director Public Policy and Industry Engagement
National Marine Manufacturers Association