

February 19, 2026

Co-Chair Josh Heintzeman
Co-Chair Peter Fischer
House Environment and Natural Resources Finance and Policy Committee
Capitol G3
St. Paul, MN 55155

Dear Co-Chair Heintzeman, Co-Chair Fischer, and Members of the Committee:

The National Marine Manufacturers Association (NMMA) appreciates the opportunity to comment and share concerns regarding implementation of Minnesota's PFAS reporting requirements and the MPCA's PRISM reporting system.

Minnesota is a national leader in recreational boat building and the outdoor economy, generating approximately \$6.9 billion annually and supporting more than 25,000 jobs and 700 businesses statewide. Many of these are small, family-owned businesses that assemble durable products designed to last decades. Furthermore, Minnesota is home to iconic American brands such as **Alumacraft Boat Company** (St. Peter, MN), **Lund Boat Company** (New York Mills, MN), **Crestliner Boat Company**, **FLOE International** (McGregor, MN), **Premier Marine** (Big Lake MN), **SHURFlo** (New Brighton, MN), as well as nearly 200 boat dealers supplying American made boats to Minnesotans.

We recognize and appreciate MPCA's role in addressing environmental concerns and enforcing common sense regulations. Our members share the goal of protecting human health and the environment. However, the marine industry has significant concerns about the practical implementation of the PFAS reporting rule while maintaining safety of recreational boats in harsh maritime conditions. While we appreciate MPCA's engagement and the extension of the reporting deadline to July 1, 2026, **recreational boat builders, primarily comprised of thousands of small businesses, do not have the capability to ascertain individual component-level PFAS information to report into the PRISM system.**

Recreational boats are highly complex assemblies that can contain more than 1,000 distinct components sourced through global, multi-tiered supply chains. Boat builders are primarily assemblers and do not manufacture most of the components they incorporate. As a result, compliance depends almost entirely on obtaining detailed chemical information from numerous suppliers—many outside Minnesota and outside the United States. With 3,000 boat builders in the United States, many of which are small and mid-sized manufacturers, this creates substantial logistical, financial, and technical burdens that are largely outside their direct control.

Recreational boats often last 30 to 50 years or more and require materials that offer superior strength, versatility and long durability for use in harsh marine environments. This is particularly of importance in northern states such as Minnesota where boats are often

winterized and stored for up to seven months a year. Recreational boats are built to stringent Coast Guard^{1,2}, American Boat and Yacht Council³ (ABYC), and international standards⁴ which require tests to demonstrate a variety of safety related compliance such as floatation and stability, electrical systems, steering & controls, boat capacity, seat systems, ventilation, fuel system components, navigation lights, personal floatation devices (PFD), propulsion cutoff systems, propulsion power, and many other criteria defined by Federal Law and industry standards.

While we appreciate MPCA's engagement and the extension of the reporting deadline to July 1, 2026, our members remain concerned that the PRISM system may not be calibrated to the realities of complex, safety-driven products.

We strongly urge Minnesota to recognize the challenges the recreational marine industry faces while trying to balance long-term safety, extended durability, and compliance with federal, state, and international maritime laws.

We remain committed to working collaboratively with MPCA and the Committee to address these concerns and support effective implementation.

Sincerely,



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

¹ The U.S. Coast Guard has statutory authority under Title 46, U.S. Code, Sections 3306(a) and (b), 4102(b), 4302(a) and (c), and 4502(a) and (c)(2)(B), to prescribe regulations for the design, construction, performance, testing, carriage, use, and inspection of lifesaving equipment on commercial and recreational vessels

² 33 CFR Parts 181 & 183: Manufacturer Requirements and Boats and Associated Equipment

³ American Boat and Yacht Council (ABYC) *Standards and Technical Information Reports for Small Craft 2025-2026* <https://abycinc.org/>

⁴ International Maritime Organization: International Convention for the Safety of Life at Sea (SOLAS), 1974 - The International Life-Saving Appliance (LSA) Code gives specific technical requirements for LSAs and is mandatory under Regulation 34, which states that all life-saving appliances and arrangements shall comply with the applicable requirements of the LSA Code.