March 24, 2026

The Honorable Josh Heintzeman
The Honorable Peter Fischer
Co-Chairs, Minnesota House Environment and Natural Resources and Finance Committee
Minnesota House of Representatives
Centennial Office Building, St. Paul, MN 55155

RE: Support for HF 4257 (as amended) – PFAS Reporting Timeline

Dear Co-Chairs:

The National Marine Manufacturers Association (NMMA) and Minnesota's recreational boating industry write in support of HF 4257 as amended to delay the PFAS reporting requirements until July 1, 2027. Minnesota's boat manufacturers – including Alumacraft, Lund, Crestliner, and Premier Marine, among many others – collectively generate $6.9 billion in annual economic impact and support more than 25,000 jobs across the state. **The amended bill's extension of the PFAS reporting deadline to July 1, 2027, represents meaningful and necessary relief for these businesses, and we urge the committee to advance it**.

We acknowledge that the amendment removes the currently unavoidable use provisions that were included in the introduced bill. While the industry continues to believe that statutory CUU clarity is important for complex durable goods like recreational boats, we recognize the amended bill as a meaningful step forward and support its passage on that basis.

The current January 2026 reporting deadline does not reflect the practical realities of recreational boat manufacturing. Recreational boats are built to last 30 to 50 years in harsh marine environments and utilize components that must remain safe and durable for the lifetime of the vessel[1]. A typical 20-foot boat contains more than 1,000 distinct components sourced from global, multi-tiered supply chains. Boat builders are assemblers – they purchase finished components and have no direct mechanism to compel upstream suppliers across multiple countries and industries to disclose detailed chemical composition data. Furthermore, recreational boat building is a craft industry with small volumes that cannot drive unique chemical specifications.

To further illustrate the difficulties and unprecedented challenge small business boat builders would face with reporting, let's consider a marine air conditioning system, one single stock keeping unit (SKU) (out of 1000s of components). The air conditioner contains 56 major assemblies. Within each major assembly, multiple sub-assemblies contain multiple parts, such as the compressor. The compressor, for example, is made up of 106 individual parts such as o-rings, electrical wiring, gaskets, valves etc. Most assemblers of marine air conditioning systems are also small businesses as the market size for these highly specialized and marine specific units are small.

How would a small business boat builder ascertain detailed chemical information for tens of thousands of individual components that make up the complete group of major components of a recreational boat? How could they even begin to gather this information to report? It's an unworkable and unprecedented task that would effectively end recreational boat building and sales into Minnesota.

[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), and 33 CFR parts 181 & 183 to prescribe regulations for the design, construction, performance, testing, carriage, use, and inspection of lifesaving equipment on commercial and recreational vessels.

We strongly urge Minnesota to recognize the unique challenges recreational boat builders face in Minnesota and work to amend the reporting requirements.

We are grateful for the committee's attention to this issue and look forward to continued engagement on the remaining compliance challenges facing Minnesota's boating industry. Our members are prepared to provide testimony at the hearing and to answer any technical questions the committee may have.

Sincerely,

Ben Murray

Director, State Government Relations

Co-signed by: AlumaCraft Boats (St. Peter) • Crestliner Boats • Lund Boat Company (New York Mills) • Premier Marine (Big Lake) • FLOE International (McGregor) • Grady-White Boats / Resort Marine & Services (Walker)