

March 4, 2024

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

Re: CTA Opposition to SF 3940 Unless Amended

Chair Hawj and Committee Members:

On behalf of Consumer Technology Association (CTA), we oppose SF 3940 unless amended.

CTA is the trade association representing the U.S. consumer technology industry, which supports more than 18 million U.S. jobs. Our membership is mostly small businesses and startups, but also includes some of the world's best-known manufacturer and retail brands.

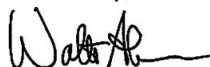
CTA is the leading trade association for manufacturers of consumer electronic devices as regulated under the current Minnesota Electronics Recycling Act. CTA has also worked with legislators and regulators across the United States to craft effective and consensus e-waste bills, most recently in Wisconsin (that bill is heading to the governor for signature) and last year in Oregon.

The portions of SF 3940 directed at updating the current requirements for the recycling of covered electronic devices should be updated with language consistent with the recently updated Oregon e-waste law. To illustrate how such a program could operate in Minnesota CTA has combined existing Minnesota law with the Oregon model, see attached. While there are several areas that clearly warrant discussion with stakeholders to find consensus, including the Minnesota Pollution Control Agency, the Minnesota Association of Counties, and recyclers, among others, the attached illustrates a better path for improving electronics recycling in Minnesota over the current bill text.

We also have questions about the scope and magnitude of the 2.2% e-waste tax on non-CEDs, but are working on a detailed CTA position.

If you should have any questions, please do not hesitate to reach out to me at WAlcorn@cta.tech or (703) 907-7765.

Sincerely,



Walter Alcorn
VP, Environmental Affairs and Industry Sustainability
Consumer Technology Association