



March 5, 2025

Senator Fong Hawj
Senate Environment, Climate and Legacy Committee
Room 1150
Minnesota Senate Building
95 University Ave. W.
St. Paul, MN 55103

Re: Opposition SF 1690 – Stewardship Program for Circuit Boards, Batteries, and Electrical Products

Dear Chairman Hawj and members of the Senate Environment, Climate and Legacy Committee:

The Juvenile Products Manufacturers Association (JPMA) is writing to express opposition to SF 1690 that would mandate an expansive and complex stewardship program for any product that contains Circuit Boards, Batteries, or might be considered an Electrical Product. Many juvenile products would fit this scope and are not able to be designed to be recyclable in the typical manner of electronics, due to stringent federal safety regulations. Therefore, we are extremely concerned about the scope of this legislation having unintended consequences for our industry.

The Juvenile Products Manufacturers Association is a national not-for-profit trade organization representing 95% of the prenatal to preschool industry including the producers, importers, or distributors of a broad range of childcare articles that provides protection to infants and assistance to their caregivers. JPMA collaborates with government officials, consumer groups, and industry leaders on programs to educate consumers on the safe selection and use of juvenile products. Our comments on this bill are grounded in the juvenile products industry's commitment to the safety of children and caregivers. This commitment to safety and the environment is the foundation of developing safe children's products.

Scope and Definitions

The bill's definitions of "covered products" and "other electrical products" are broad and encompass a wide array of juvenile products that incorporate electronic components, such as baby monitors, electronic toys, and nursery equipment. This expansive scope would subject these products to the proposed stewardship requirements, leading to unintended consequences for both manufacturers and consumers. Simply put, juvenile products are not like other electronic products that contain circuit boards and typically are used by consumers for a much longer period of time than typical electronic products and will be reused with new children entering a family environment.

Conflicts with Existing Safety Standards

JPMA members adhere to stringent federal and state safety regulations, including those enforced by the Consumer Product Safety Commission (CPSC) that force product design elements that make juvenile products incompatible with typical electronics and battery recycling programs. In addition, JPMA's certification program mandates

JUVENILE PRODUCTS MANUFACTURERS ASSOCIATION, INC.

1120 Route 73, Suite 200 • Mt. Laurel, NJ 08054
TEL: 856.638.0420 • FAX: 856.439.0525
jpma@jpma.org • www.jpma.org

compliance with all 50 states' chemical safety requirements, addressing substances such as lead, cadmium, mercury, antimony, flame retardants, and phthalates. Introducing additional state-specific stewardship obligations could create redundancies and potential conflicts with these established standards, complicating compliance efforts without demonstrable benefits to environmental outcomes and complicating product safety requirements.

Economic and Operational Impact

The proposed program may impose substantial financial and operational burdens on juvenile product manufacturers, particularly small and medium-sized enterprises. The costs associated with implementing and managing a product stewardship program could hinder innovation and limit the availability of essential juvenile products in the Minnesota market. Moreover, these added expenses may ultimately be passed on to consumers, affecting affordability and access to safe, high-quality products for children.

Recommendations

We respectfully recommend that the Committee consider the following actions:

1. **Clarify Exemptions:** Explicitly exclude juvenile products that are already subject to comprehensive federal safety standards from the scope of SF 1690 to prevent negative impacts on the electronics recycling stream and product safety.
2. **Stakeholder Engagement:** Engage in dialogue with industry stakeholders, including JPMA, to assess the potential impact of the proposed legislation on various sectors and to develop more targeted and effective environmental strategies.
3. **Harmonize Regulations:** Ensure that any new state initiatives are harmonized with existing federal regulations to maintain a cohesive regulatory environment that facilitates compliance and promotes product safety without imposing unnecessary burdens.

Conclusion

JPMA appreciates the opportunity to discuss SF 1690 and our concerns with the scope of the bill and its potential impact on product safety. Product safety is the top priority for JPMA and environmental sustainability is paramount to JPMA members as well. We appreciate the desire to improve electronics recycling; however, we urge this Committee to consider a more reasonable scope for this type of program.

JPMA remains committed to collaborating with policymakers to achieve our shared goals of protecting children and promoting environmental sustainability. We welcome the opportunity to work together to develop solutions that are both effective and practical for all stakeholders involved. Thank you for considering our perspective on this important matter.

Respectfully Submitted,



Lisa Trofe, CAE
Executive Director