



**peopleforbikes**

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**March 5, 2025**

**Senator FOUNG Hawj, Chair**  
**Senator Jennifer McEwen, Vice Chair**  
**Senate Environment, Climate and Legacy Committee**

**RE: PeopleForBikes Letter Proposed Amendment to SF 1960**

Dear Chair Hawj, Vice Chair McEwen and Members of the Committee;

I write to you on behalf of the PeopleForBikes Coalition to express our concerns with the current language of SF 1960 and to urge you to amend the bill prior to advancing it out of the Committee. For the reasons set forth below, we respectfully suggest that the definition of "covered product" in Section 3(j) of proposed new Chapter 115A.1331 be amended to clarify that bicycles and electric bicycles are excluded from that definition.

Specifically, we urge the Committee to amend the bill by adding a new Section 3(j)(4)(iii):

(iii) a bicycle, as defined in section 169.011, Subd. 4.

**About PeopleForBikes**

The PeopleForBikes Coalition is the sole trade association for U.S. manufacturers, suppliers and distributors of bicycle products, including electric bicycles. Our 335 members represent companies that produce goods in every segment of the bicycle market, from high-end competition bicycles to affordable kids' bikes. Our members produce the full range of components, parts and accessories used for bicycling, as well as electric bicycles. PeopleForBikes is a leader in efforts to promote safe cycling, sustainability, proactive product safety regulations and transportation-related legislation related to bicycles, electric bicycles and their operation.

PeopleForBikes created the [Three-Class Model Law](#), which has now been adopted in 43 states (including Minnesota) and in federal legislation to better define and regulate electric bicycles. We also co-created [E-bike Smart](#), an online safety course for consumers, as well as the first E-bike specific Owners Manual for manufacturers to provide with new electric bicycles. We have worked at the federal, state and local levels to create battery and electric bicycle testing and safety standards, which have been adopted in New York and California, with legislation now pending in several additional states.

**Importantly, PeopleForBikes worked with the leading nonprofit stewardship organization Call2Recycle to create the first voluntary national [recycling program](#) for lithium-ion batteries used in electric bicycles.** Under this program, consumers can already bring their end of life batteries to any participating bicycle retailer in Minnesota for safe, free disposal and recycling. There are dozens of such drop-off locations in Minnesota, and over 2200 locations nation-wide.

### **Our Concerns with SF 1690**

We note that Section 3(j) of the bill already excludes most motor vehicles from the definition of “covered product:”

(j) **"Covered product" means:**

(1) a covered circuit board;

(2) a covered battery;

(3) a cathode-ray tube; and

(4) a product that has a covered circuit board, a covered battery, or a cathode-ray tube contained within it or otherwise attached or connected to it, **except;**

(i) a medical device meeting the definition of a device under United States Code, title 21, section 321, unless it is marketed for use in a household, as defined in section 115A.96; and

**(ii) a motor vehicle, as defined in section 168.002**

The referenced definition of “motor vehicle” in section 168.002 provides as follows:

**Subd. 18. Motor vehicle. (a) "Motor vehicle" means any self-propelled vehicle designed and originally manufactured to operate primarily on highways, and not operated exclusively upon railroad tracks. It includes any vehicle propelled or drawn by a self-propelled vehicle and includes vehicles known as trackless trolleys that are propelled by electric power obtained from overhead trolley wires but not operated upon rails.**

Subdivision 18 (b-d) lists various exclusions from the definition of “motor vehicle,” such as all-terrain vehicles, manufactured homes and electric bicycles. These are intended to exclude these motor vehicle types from registration, licensing and insurance requirements applicable to other motor vehicles that may be used or transported on public roads. On the other hand, off-road motorcycles used on the roadway and “roadable airplanes” are included in the definition of “motor vehicle.” Minn. Stat. Section 168.002(e), (f).

It is therefore less than clear whether the bill intends to *exclude* electric bicycles (and various other vehicle types) as “covered products” because they are within the definition of “motor vehicle” in Section 168.002, Subd. 18(a), or *include* them because they fall under one of the exclusions that follow (which were clearly adopted by the Legislature for entirely different reasons than producer responsibility). **PeopleForBikes respectfully suggests that electric bicycles should be specifically excluded as “covered products” by adding the specific suggested exclusion above.**

For purposes of electronics recycling, electric bicycles are more like other excluded vehicles in that they are designed for outdoor use and their electronics (circuit boards) are a relatively small part of the overall product and its materials. Electric bikes typically have a few circuit boards that control the drive system, monitor battery function, and support a visual user display on the handlebars. Electric bicycles typically weigh between 50 and 80 pounds, while their circuit boards and electronic components weigh just a few ounces. Additionally, the relative size and bulk of these products compared to small consumer electronic products covered by the bill could also pose an issue for collection points.

Further, like other excluded vehicles and unlike many “throw away” electronic products, electric bicycles are relatively expensive and are designed to be durable, with a long life span, and to be repairable either by consumers or local bicycle retailers. And the U.S. bicycle industry has already provided a circular and sustainable path for the largest electrical component on an electric bicycle: the battery. The valuable materials contained in lithium-ion batteries make them ideal candidates for recycling, and our industry has acted responsibly and with forethought by creating a program, administered by a non-profit organization, that does just that - at no cost to consumers.

Finally, it should be noted that some modern higher-end conventional bicycles may also be equipped with electronic components in the form of [shifting systems](#) or power meters. Again, the electronic portions of these components make up only a very small portion of the total size and mass of these bicycles. Bicycles and these components are designed for durability, serviceability and long life, and ruggedized to withstand use on roads and trails, as well as exposure to the elements. Bicycles and electric bicycles are quintessential “green” products that are purposely designed to stay out of the waste stream entirely.

Accordingly, PeopleForBikes respectfully suggests that SF 1690 be amended to specifically exclude bicycles and electric bicycles from the definition of “covered products.”

PeopleForBikes appreciates the opportunity to provide the Committee with our comments on this legislation and stands ready to provide any additional information you may require.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Matt Moore', with a stylized, cursive script.

Matt Moore

Policy Counsel

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