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March 11, 2026

Senator Tou Xiong, Chair
Senate State and Local Government Committee
Room 1200 Minnesota Senate Building
St. Paul, MN 55155

Re: CTA Opposition to SF1690

Chair Xiong and Members of the State and Local Government Committee,

On behalf of Consumer Technology Association (CTA), we respectfully oppose SF1690, establishing a stewardship program for circuit boards, batteries, and electrical products.

CTA is the trade association representing the U.S. consumer technology industry. Our members are the world's leading innovators – from startups to global brands to retailers – helping support more than 18 million American consumer technology jobs. As an industry, we have supported the proper collection and recycling of electronics in Minnesota for over 17 years, diverting more than 467,900,000 pounds of electronics from the waste stream.¹

CTA is committed to constructive conversations around reform needed to ensure the collection and recycling system is working for Minnesota. We understand there are challenges to the current program structure including the pounds-based targets and local collection efforts around electronics. However, upending the existing program and replacing it with the program proposed in SF1690 is not the right solution.

Background

The Minnesota Electronics Recycling program has been in place since 2007. It requires manufacturers of video display devices (primarily televisions and computer monitors) to support the collection and recycling of a broader set of electronic devices from consumers within the state. CTA understands there are challenges to the existing program and is open to discussion around how best to address those issues. CTA has supported similar efforts to revisit existing EPR programs in other states.

In fact, CTA felt it was making progress with stakeholders on possible reform to the Minnesota program in the first part of 2024. However, CTA and manufacturers were not invited to the dialogue

¹ Data pulled from Minnesota Electronics Recycling Act Program Data Reports for Program Year 1 (July 2007 – June 2008) – Program Year 16 (July 2022 – June 2023). Data for Program Year 17 (July 2023 – June 2024) is not yet available. Reports available on the MPCA website at <https://www.pca.state.mn.us/business-with-us/electronics-collection-and-recycling> under Program Impact.

that occurred during the middle to second part of 2024 between the Minnesota Pollution Control Agency (MPCA), Minnesota Solid Waste Administrators Association (SWAA), and Recycling Electronics for Climate Action (RECA). CTA was provided with an overview of the proposal from that smaller group back in the fall of 2024 to which we strongly objected and expressed concerns. The next engagement from that group was CTA being provided with a draft of the language that was ultimately introduced a very short time later as SF1690.

Challenges with SF1690

SF1690 is not the right solution. The proposal sunsets the existing Electronics Recycling program and replaces it with a very different extended producer responsibility (EPR) structure that covers all products containing a circuit board, battery, or cathode ray tube. The universe of products impacted is significant. Everything from products currently in scope of the Electronic Recycling program (e.g. televisions, computer monitors, laptops) to items such as small appliances, toys, juvenile products, lighting equipment, security equipment, and any product that contains a circuit board or battery. This could include children's light-up tennis shoes, garden irrigation systems with programmable timers, singing teddy bears, desktop lamps with touch controls, and products outside of what is traditionally considered an electronic device.

CTA and our members have over two decades of experience funding and administering electronics EPR programs across 25 states, including Minnesota. Our knowledge about what has worked and what has not worked is extensive. We have been a good faith partner in moving forward reasonable legislative changes where needed in states with existing electronics EPR programs.

While consumer technology companies want to ensure their products are recycled in a safe and responsible manner, the proposal in SF1690 would upend the current system for electronics. We have multiple concerns around the proposal from product labeling to the costly single stewardship organization structure to the latest amendments seeking to regulate the management of chemicals in products. No other jurisdiction around the United States has as broad of an EPR program in place covering this multitude of products.

CTA Recommendation

CTA continues to want to be an active stakeholder in dialogue around reform to the existing Minnesota Electronics Recycling Program. CTA has multiple concerns around the proposal from product labeling to the costly single stewardship organization structure to the broad scope of products impacted. To address all these concerns within the legislative session with SF1690 as the vehicle is not the right path forward. We look forward to more thoughtful stakeholder engagement on a viable path forward.

If you should have any questions, please do not hesitate to reach out to me at kreilly@cta.tech.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katie Reilly', with a stylized flourish at the end.

Katie Reilly
VP, Environmental Affairs and Industry Sustainability
Consumer Technology Association