



March 11, 2025

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

On behalf of Minnesota Retailers, representing 1,200 storefronts across the state ranging from small, family-owned businesses to mid-sized and national retailers, we oppose the approach to regulating e-waste outlined in SF 1690.

Minnesota has long been a leader in sustainability, particularly in e-waste and battery recycling. **Our state has implemented strong waste diversion programs and has a track record of balancing environmental responsibility with economic competitiveness.** However, SF 1690 takes a broad and unprecedented step that could have significant consequences for both retailers and consumers.

**As currently written, this bill would establish a new regulatory program that applies to nearly any product containing a rechargeable battery, circuit board, or electrical cord.** This expansive approach raises serious concerns about feasibility, unintended consequences, and the impact on retail competitiveness—especially given Minnesota’s higher tax and cost structure compared to neighboring states like Iowa, Wisconsin, and the Dakotas.

We appreciate the improvements made to this year’s proposal compared to previous versions, particularly the shift to a manufacturer-funded model rather than imposing an over 3% point-of-sale tax on consumers. **However, despite these positive changes, the bill remains broad and complex, and unfortunately, it has not been fully vetted with all impacted stakeholders.**

Minnesota Retailers stands ready to collaborate with Senator Kupec and all stakeholders. **We believe there is a path forward that strengthens Minnesota’s leadership in sustainability while ensuring it balances environmental responsibility with economic competitiveness and consumer affordability.**

We look forward to working together on this important issue. Thank you for your time and consideration.

Sincerely,

A handwritten signature in dark blue ink, appearing to read "Bruce Nustad", with a stylized flourish at the end.

Bruce Nustad  
bruce@mnretail.org