



1919 S. Eads St.  
Arlington, VA 22202  
703-907-7600  
CTA.tech

March 26, 2025

Senator Lyman Hoffman, Co-Chair  
Senator Donald Olson, Co-Chair  
Senator Bert Stedman, Co-Chair  
Alaska Senate Finance Committee  
120 4th Street  
Juneau, AK 99801

Re: CTA Opposition to SB61

Co-Chair Hoffman, Co-Chair Olson, Co-Chair Stedman, and Members of the Senate Finance Committee:

On behalf of Consumer Technology Association (CTA), we respectfully oppose SB61.

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 at end of life via voluntary, manufacturer led programs in combination with state mandated programs ensuring electronics are sent to responsible, certified electronics recycling facilities across the U.S.

### **Challenges with SB61: Significant Burden**

While consumer technology companies want to ensure their products are recycled in a safe and responsible manner, the proposal in SB61 would place a significant burden on manufacturers. The electronics recycling program proposed in SB61 would establish the broadest, most cumbersome, and likely most costly electronics recycling program in the U.S.

Several challenges exist within both the program proposal and the unknowns for managing end of life electronics in the state:

- Typically, in the US, we see individual manufacturers able to dictate their own programs independently or among small groups versus establishing a Producer Responsibility Organization (PRO) which helps keep costs manageable for producers. The stringent convenience requirements; extremely detailed documentation required by the plan (e.g. documentation of processor audits; descriptions of accounting/reporting systems; detailed reporting on material recovered from processing; etc.); and unknown existing infrastructure to properly manage electronics across the states means that a Producer Responsibility Organization (PRO) is likely to be established in Alaska versus individual manufacturer programs. With a PRO, we anticipate an increased overhead raising financial implications even higher for manufacturers.

- The convenience requirements exceed those of any other state in the country. The requirements appear beyond “reasonably convenient”. As an example, manufacturers would be required to provide collection events once per year in every community with a population less than 5,500. That equates to well over 200 collection events a year to serve those communities. The costs have the potential to skyrocket for manufacturers given these requirements are beyond what other states require and may be beyond what’s needed to effectively and efficiently serve the communities in Alaska.
- After discussions with the Department of Environmental Conservation (DEC), it remains unclear to CTA what the existing collection infrastructure looks like for manufacturers to leverage. This makes it extremely difficult to determine the feasibility and what the costs would be for manufacturers to comply. Permanent collection sites must be manned by individuals that are trained in how to sort, stack, palletize, and then shrink wrap electronics for safe transport to a recycler. Maintaining a year-round collection site for smaller communities (any community with more than 5,500 individuals) when there is no existing infrastructure to tap into will be cost prohibitive.
  - o In other states that have adopted programs, manufacturers were able to tap into and support the existing infrastructure for their programs including local governments and non-profits skilled in collecting and managing e-waste prior to manufacturer programs being established. The costs to set-up a program from essentially scratch in most communities would also lead to higher costs for producers.
  - o The substitution of four collection events for one collection site is also unreasonable. Collection events are expensive to conduct, and a minimum volume of material needs to be collected, ideally 18,000 – 20,000 pounds (the equivalent of one trailer). This means for a community of 5,500 to 10,000 individuals, that community must generate 72,000 – 80,000 pounds of electronics each year to warrant the need for four collection events.
- In addition to the unknown around existing collection infrastructure, there exists no certified electronics recycling facility in Alaska. Manufacturers want to work with certified electronics recyclers – via accredited certification standards such as the R2 or e-Stewards. Therefore, electronics must be transported to the lower 48 states to reach recyclers certified in environmentally responsible practices leading to additional increases in costs for producers to transport material to the lower 48 states.
- SB61 requires that, for a retailer to operate as a collection site, the community must agree along with the retailer and manufacturer. It is unclear who in a community would be responsible for making that determination and how a manufacturer and retailer would work with that community.
- Producer responsibility programs for electronics have not been shown to drive design changes in products. Therefore, manufacturers should not be required to report how they are working with processors to encourage design of products and components for recycling given it does not occur under these programs.

- Terms such as “fair financial compensation” are undefined leaving it unclear what the expectation is for manufacturers as they set-up their programs and partner with collection sites and who ultimately determines what is approved as “fair financial compensation”.
- Microwave ovens should not be included as a “covered electronic device”. A microwave is an appliance, not an electronic device. The recycling of microwaves is not typically handled via electronics recycling streams given the potential for food contamination and other challenges. This product category should be removed from the definition of “covered electronic device”.
- CTA is concerned with the definition of “eligible electronic device” including any “battery-containing electronic”. That definition is broad and would capture products like toys (e.g. singing teddy bears), small appliances, and even items such as kids light-up tennis shoes that are incompatible with the consumer electronics recycling system. The inclusion of these products would only raise costs higher for manufacturers since the electronics recycling system is not equipped to manage these products. It would also be an unfair burden on electronics manufacturers who would be required to fund the system to accept these materials but who don’t manufacture those products.
- Retailers should not be responsible for providing public education information on how to recycle electronics. Manufacturers may operate different programs, and a retailer cannot be expected to provide information on all programs operating in the state. Rather, manufacturers should be required to provide that information via their own websites for their consumers.
- It is unclear the necessity of the Electronics Recycling Advisory Council. In most other states, the state environmental agency is able to provide sufficient oversight of the program including review and approval of plans.

### **CTA Recommendation**

CTA is open to dialogue around the proper management of end-of-life electronics in Alaska, but the proposal outlined in SB61 is not the solution. It’s unclear how e-waste fits into the overall recycling and solid waste management solutions in Alaska or if an infrastructure to responsibly collect and manage e-waste under the standards proposed in SB61 exists today. Additionally, without a more thorough evaluation of what type of program – including convenience requirements - is needed to best serve Alaskans, SB61 may be proposing manufacturers pay to establish a cost prohibitive program well beyond the needs of Alaskans.

CTA would be happy to participate in a discussion around how e-waste fits into the overall recycling and solid waste management needs of Alaska. CTA would recommend that DEC conduct a survey to determine the amount of household generated e-waste in Alaska to better inform how much and where e-waste is being generated in the state in combination

with an assessment of the collection infrastructure and capabilities of communities throughout Alaska to responsibly manage e-waste.

Our overall concern with this measure is that it will add considerable costs which ultimately will be borne in one way or another by the Alaska consumer. We should call this what it is: it's a tax. It is a brand new tax, and potentially a very big tax at a time when Alaskans can least afford one.

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