

March 15, 2024

Senator Click Bishop and Senator Cathy Giessel, Co-Chairs
Senate Resources Committee, Alaska Senate
120 4th Street
Juneau, AK 99801

Re: CTA Opposition to SB 175

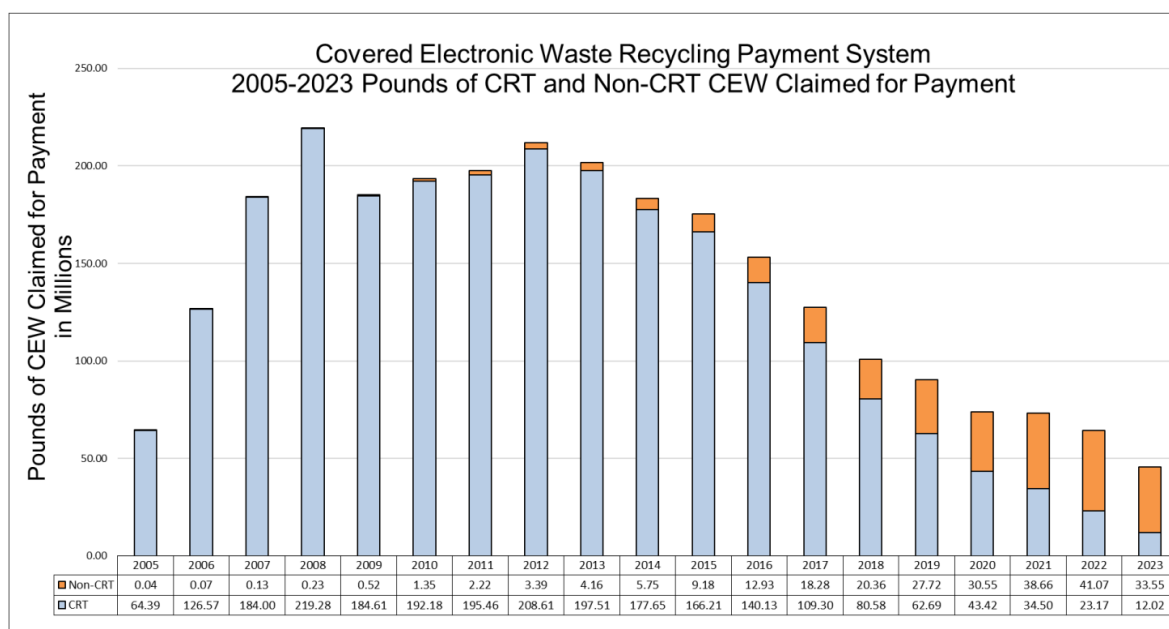
Co-Chairs Bishop and Giessel:

On behalf of the Consumer Technology Association (CTA), we oppose SB 175.

CTA is the trade association representing the U.S. consumer technology industry, which supports more than 18 million U.S. jobs. Our membership is mostly small businesses and startups, but also includes some of the world’s best-known manufacturer and retail brands. CTA represents the manufacturers and retailers targeted by SB 175.

Before focusing on specific bill concerns some context is important. E-waste is not a growing problem, but declining faster than any other product category according to the latest U.S. EPA data (see table 14 of [this report](#)). The EPA data are corroborated by published studies, including [this study published in 2020](#) by researchers from the Rochester Institute of Technology and Yale which was funded in part by CTA. This trend is also reflected in California collections data below.

Quarterly Update on California’s Covered Electronic Waste Recycling Program



Since the publication of these reports, e-waste declines have continued across the country. In states with mature collection programs like California and Washington, the recent totals are only about 1/3 of the e-waste totals collected a decade ago under the same programs.

E-waste is declining because during the past 2 decades electronics manufacturers have produced products with fewer and lighter materials enabled by technology innovations. Materials used in consumer technology products have continuously improved and devices now result in much less e-waste.

Problem materials have also been designed out of new products. For example, the old cathode ray tube technology required leaded glass but has been replaced by two subsequent generations of video display technologies that produce better displays without leaded glass. Innovation is a hallmark of our industry, and continuous improvement in materials used in products has dramatically reduced our industry's environmental footprint.

The top level of [U.S. EPA's Waste Management Hierarchy](#) is reducing waste, and as the data show electronics manufacturers have made significant gains in reducing material usage and waste.

Specific CTA Concerns

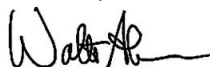
SB 175 mirrors language written for Oregon which passed that legislature last year. Oregon has completely different recycling and geographic profiles than Alaska, and the Oregon approach – which CTA helped to develop in collaboration with Oregon stakeholders – is not the right place to start.

Given the unique challenges posed by Alaska, a broader discussion about how e-waste (which is less than 2% of all solid waste and dropping) fits into overall recycling and solid waste management solutions in Alaska is needed. CTA would be happy to participate in such a discussion but we reject the notion that electronics manufacturers should be forced to bear all responsibility – and without being at the table for this proposal's development.

Our overall concern with this measure is that the additional expense and bureaucracy that would be required under this legislation is excessive and unnecessary. It would undoubtedly lead to increased costs and regulatory hurdles that would likely result in increased prices for the Alaskan consumer. And at a time when Alaskans can scarcely afford it. We urge you to put this bill aside and not advance it.

Thank you for this opportunity to testify. If you should have any questions, please do not hesitate to reach out to me at WAlcorn@cta.tech.

Sincerely,



Walter Alcorn

VP, Environmental Affairs and Industry Sustainability
Consumer Technology Association