

February 16, 2017

Submitted via email: Sen.MichaelDembrow@state.or.us

Senator Michael Dembrow
Chair, Senate Committee on Environment and Natural Resources
900 Court St. NE, S-407
Salem, OR 97301

**Re: SB 199 Relating to Household Hazardous Waste
Hearing: Thursday, February 16, 1:00 p.m., HR C**

Dear Chair Dembrow and Members of the Committee on Environment and Natural Resources:

On behalf of the Consumer Technology Association (CTA)™, I am writing to address our concerns with [SB 199](#), which establishes a product stewardship program for household hazardous waste.

CTA is the trade association representing the U.S. consumer technology industry. CTA represents more than 2,200 companies, with more than 30 manufacturers and retailers based in Oregon. For many years, CTA has supported and advanced electronics recycling as part of the industry's broader commitment to environmental sustainability.

SB 199 creates a product stewardship program for household hazardous waste, and the broad scope of covered products as currently written could include consumer electronic devices. However, Oregon's [Electronics Recycling Law](#) already has a well-established product stewardship program for ensuring the safe recycling of consumer electronic devices: [Oregon E-Cycles](#). Manufacturers of devices covered under this law pay a registration fee and participate in recycling programs, which provide free and responsible recycling across the state.

We are concerned that SB 199's definition of "covered product" would duplicate requirements for an industry already covered by existing law. To avoid this unnecessary complication, were this bill to move forward, we recommend adding "consumer electronics" to the list of explicitly excluded product categories in [Section 2](#):

- (2)(b) "Covered product" does not mean:*
- (A) A primary battery or rechargeable battery.*
 - (B) A lamp that contains mercury.*
 - (C) A thermostat that contains mercury.*
 - (D) A pharmaceutical drug.*
 - (E) A consumer electronic device.*

Clearly excluding consumer electronics from the covered products would prevent any unnecessary burdens caused by duplicating regulations on those already engaged in the collection and environmentally sound management of consumer electronics. Thank you for the opportunity for

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our industry to comment on SB 199, and if you would like to discuss our recommendations further please do not hesitate to contact me at (703) 907-7765 or walcorn@cta.tech.

Sincerely,
THE CONSUMER TECHNOLOGY ASSOCIATION

A handwritten signature in black ink, appearing to read "Walter Alcorn", with a long horizontal flourish extending to the right.

Walter Alcorn
Vice President, Environmental Affairs and Industry Sustainability

Producer of

