



February 5, 2026

House Committee on Climate, Energy, and Environment

Oregon State Legislature

RE: HB 4144 – Redwood Materials – Oppose Unless Amended

Chair Lively, Vice Chairs Gamba and Levy, and the Members of the House Committee on Climate, Energy, and Environment:

On behalf of Redwood Materials, we write to express our serious concerns with HB 4144 in its current form. We strongly support the bill's intent to enhance battery safety and promote responsible environmental stewardship by keeping batteries and devices out of landfills. **However, the legislation as drafted does not adequately account for battery collection and recycling services already being provided by trusted and experienced operators such as Redwood Materials. We therefore must oppose it unless it is amended.** We believe that with a few targeted amendments, this legislation – and the battery collection program it establishes – will achieve higher battery collection rates, deliver meaningful improvements to battery safety across Oregon, and create a framework that bolsters our nation's domestic recovery of critical minerals.

About Redwood Materials

Redwood Materials is the largest lithium-ion and rechargeable battery recycler in North America and operates across the full lifecycle of end-of-life batteries. Given our extensive experience and trusted role in this space, Redwood performs multiple functions under battery responsibility laws such as this one. We recycle the batteries collected under stewardship programs, serve as a Battery Producer Responsibility Organization (BSO) or stewardship partner for producers that self-represent, and operate independent battery collection programs outside of stewardship organizations.

As part of Redwood's consumer battery collection program, we provide free to the public battery collection across the country. To date, we have recovered more than 100,000 pounds of batteries for recycling, returning them to the domestic battery supply chain. Redwood's consumer battery collection program includes:

- **Battery Bins** – Redwood operates hundreds of battery collection locations nationwide in partnership with public and private organizations. Our Battery Bins are a patented, first-of-its-kind public-facing collection system that safely stores and monitors mixed batteries and battery-containing devices with no preparation required—no taping, sorting, bagging, or disassembly. The system uses automated sensing and real-time monitoring to enable fire-safe, scalable collection across all battery chemistries and device types.
- **Producer Partnerships** – Redwood partners with producers nationwide as a trusted stewardship partner for the safe and responsible end-of-life management of battery-powered products. These partnerships span large-format automotive battery OEMs and small- and medium-format producers

across e-mobility, power tools, and consumer electronics, supporting compliant collection, logistics, and downstream recycling or repurposing.

- **Community Collection Events** – Consumers may also recycle end-of-life batteries through community collection events hosted in partnership with Rotary Clubs, K–12 schools and universities, local governments, and other civic organizations.
- **Education and Outreach** – Redwood’s Advocate Toolkit and partner-led education campaigns provide practical guidance on battery and device recycling, helping communities safely participate in battery recovery efforts and the clean energy transition.

Proposed Amendments to HB 4144

To ensure Oregon develops a best-in-class battery recovery program, Redwood recommends the state consider the following bill amendments:

1. Expand the Definition of “Battery Producer Responsibility Organization” to Include Battery Recyclers

Limiting battery stewardship organizations exclusively to nonprofit entities can hinder competition, constrain innovation, and reduce overall program effectiveness. Allowing entities such as qualified battery recyclers to serve as stewardship organizations would broaden expertise, unlock additional capital and operational capacity, and strengthen the overall recycling ecosystem.

With appropriate reporting and performance requirements in place, any stewardship organization—whether nonprofit, for-profit, or producer-led—can provide the transparency and accountability necessary to ensure a successful program. Expanding eligibility also reduces overreliance on a narrow set of organizations, improving system resilience and long-term outcomes for consumers, recyclers, and the environment.

2. Allow For the Equitable and Collective Operation of Multiple Battery Producer Responsibility Organizations

To allow for the successful and equitable operation of multiple BSOs, there are four improvements that must be made to this legislation. First, the state should allow a producer to self-represent as their own BSO if desired. Second, this law should allow all approved BSOs to collectively satisfy statewide convenience standards. As written, this bill requires each battery stewardship organization to individually meet statewide convenience standards. This creates a barrier for producers who want to self-represent or join a smaller stewardship organization.

Third, each BSO should only be required to be responsible for the battery format(s) placed on the market by the producers it represents. This prevents cross-subsidization between unrelated battery markets, promotes fair cost allocation, and aligns each BSO’s responsibilities with its technical expertise. Medium-format batteries—such as those in e-bikes, scooters, and power tools—require different safety protocols, transportation methods, and processing infrastructure than small portable batteries. Allowing BSOs to focus on the formats they represent improves safety, efficiency, and

material recovery. Fourth, the fees in which BSOs must pay to the state for the administration of this program should be equitable, based off of market share. That way a singular producer BSO does not have to pay the same stewardship plan review fees as a BSO representing 50 producers.

3. Allow for the Independent Collection of Covered Batteries Outside of Battery Stewardship Organizations

Entities like Redwood Materials are already offering free battery collection services all across the country. This legislation should provide clarity that such free collection services may continue to operate alongside, and in complement, to the state's battery EPR law. Qualified entities such as battery recyclers must be free to collect, transport, and recycle covered batteries by any lawful method independent of a BSO, with no obligation to forfeit material to a BSO and no artificial limits on collection models (e.g., fee-based household pickup, mail-back, drop-off sites, community events, curbside pilots, or other innovative approaches). So long as appropriate information is reported to help meet statewide collection goals, this approach simply allows recyclers to continue doing what they are already doing, serving as a complement to battery stewardship programs by further expanding pathways and increasing convenience for consumers.

4. Define “battery recyclers” and require Battery Stewardship Organizations to coordinate with battery recyclers for the end-of-life management of covered batteries

To address the unique safety, environmental, and material-recovery considerations of covered batteries, the bill should define “battery recyclers” as entities with the expertise and technology to responsibly process—and truly recycle—these batteries, rather than simply collect or consolidate them. Critically, this legislation should require BSOs to coordinate with battery recyclers for the end-of-life management of covered batteries – ensuring not just collection, but full recycling by facilities capable of processing batteries and remanufacturing the recovered materials.

We estimate that 60% of end-of-life batteries collected were exported from the U.S. in 2025 after collection, representing the loss of a significant source of critical minerals deemed essential for our national competitiveness by bi-partisan leadership across administrations. With this small legislative addition, Oregon can ensure that valuable critical materials are actually recycled and reintegrated into a circular supply chain, reduce reliance on foreign sources of critical minerals, strengthen U.S. manufacturing, and lower the cost of essential energy technologies.

Redwood remains committed to keeping batteries out of landfills and building a robust domestic battery recycling ecosystem. We stand ready to partner with the State of Oregon to develop the most effective battery recovery program possible. We respectfully urge the adoption of these amendments, which will position Oregon to lead in implementing a modern, effective stewardship framework that increases safety, supports private-sector innovation and enhances consumer convenience.

We appreciate your attention to this matter and look forward to your support in making these necessary amendments to **HB 4144**.

Sincerely,

A handwritten signature in black ink that reads "Ashley Seaward". The signature is fluid and cursive, with "Ashley" on the top line and "Seaward" on the bottom line, slightly overlapping.

Ashley Seaward

Manager of State Policy & Government Relations

Redwood Materials

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