



February 12, 2024

The Honorable Chairman Senator Brian J. Feldman
Education, Energy, and the Environment Committee
2 West
Miller Senate Office Building
Annapolis, Maryland 21401

Re: Senate Bill 553 (FAVORABLE WITH AMENDMENTS), “Maryland Zero Emission Electric Vehicle Infrastructure Council – Membership.”

Dear Chair Feldman and members of the Committee,

The Automotive Recyclers Association (ARA) appreciates the opportunity to provide the following comments on behalf of our Maryland member businesses on Senate Bill 553 (SB 553), legislation modifying the membership of the Maryland Zero Emission Electric Vehicle Infrastructure Council. As electric vehicles become a larger percentage of the total vehicle population within the United States, it will become increasingly important for Maryland to have a comprehensive strategy for promoting the reuse, repurposing, and recycling of end-of-life (EOL) electric vehicles and their batteries. ARA is the national trade association representing the automotive recycling/dismantling industry. ARA is a recognized leader in the area of EOL electric vehicles and electric vehicle policy and is regularly consulted on best practices for the EOL processing of electric vehicles and the responsible and environmentally sound processing and reuse of electric vehicle batteries. *ARA respectfully requests that SB 553 be amended to include one member of the Maryland automotive dismantling and recycling industry.*

I. About the Automotive Recyclers Association

Since 1943, ARA has represented the professional automotive dismantling and recycling industry. Professional automotive recyclers supply recycled original equipment (ROE) motor vehicle replacement parts to consumers around the world – thereby creating a ROE repair parts market. After vehicles have been processed and ROE parts have been extracted, the remaining vehicle hulk is crushed and sent to a facility for shredding and metal reclamation. Recycled materials from motor vehicles are eventually reused in manufacturing and help minimize the need for mining and lessen the resulting pollution including greenhouse gases. Automotive dismantlers and recyclers are a key party in creating a circular and environmentally friendly economy.

II. Automotive dismantlers and recyclers are the key to promoting the reuse, repurposing, and recycling of electric vehicles and electric vehicle batteries.

As the primary recipients of all light, medium, and heavy-duty end-of-life (EOL) vehicles, automotive dismantler and recyclers are the largest collective owners of EOL electric vehicles, electric vehicle components, nickel metal hydride (NiMH) batteries, and lithium-ion (Li-ion) vehicle batteries. Therefore, ARA and its members are the primary facilitators of the reuse, repurposing, and recycling of electric vehicle components and electric vehicle batteries. ARA's inclusion on the Council will add expertise on the handling and processing of electric vehicles by ensuring that the group takes the entire lifecycle of electric vehicles into consideration.

ARA's members currently handle the collection of batteries for all existing EOL vehicles and have long had the specialized training to safely handle and recycle millions of lead-acid batteries from internal combustion engine vehicles. Automotive recyclers' expertise also now includes the safe handling of NiMH electric hybrid batteries and Li-ion batteries found in full electric vehicles. The need to reuse, repurpose, and recycle electric vehicles and their batteries is a priority for the federal government and motor vehicle manufacturers due to predictions that there will soon be a shortage of the critical materials used in the manufacture of Li-ion electric vehicle batteries.¹ Without the reuse, repurposing, and recycling of Li-ion electric vehicle batteries and their critical materials by automotive dismantlers and recyclers, the U.S. will struggle to see widespread adoption of electric vehicles due to a lack of raw materials used in the manufacture of new electric vehicle batteries.

III. The Automotive Recyclers Association is the only trade association representing the automotive dismantling and recycling industry and provides the entire industry with training and certification to safely work on high voltage vehicles.

To promote the reuse, repurposing, and recycling of electric vehicle batteries, ARA has been educating automotive recyclers on the evolving technology related to dismantling electric and hybrid vehicles. ARA has developed resources and training that will allow for the safe removal, handling, and reuse of electric vehicle batteries. ARA has been working to develop partnerships and relationships within the entire EV battery recycling space for over a decade.

For over twenty years, ARA has been providing certification to the best automotive recycling facilities under the Certified Automotive Recycler (CAR) program. The CAR program provides professional automotive recyclers with a set of industry-leading standards for business practices, environmental management practices, safety practices, and legal and compliance oversight. As a part of the CAR program, ARA provides high voltage vehicle training and certification so that automotive recycling/dismantling facilities can safely process, handle, store, and transport electric vehicles.

In addition to its high voltage vehicle training and certification, ARA has compiled safety information to create a training program that is freely accessible to all automotive recyclers. ARA and its Certification Committee has been educating automotive recyclers about processing electric

¹ Notice of Request for Information (RFI) on Risks in the High-Capacity Batteries, Including Electric Vehicle Batteries Supply Chain, 86 Fed. Reg. 16343 (March 29, 2021). <https://www.govinfo.gov/content/pkg/FR-2021-03-29/pdf/2021-06337.pdf>.

vehicles through the publication of training modules and an Electric and Hybrid Vehicle Technology Training Guide.² ARA has also developed and provides automotive recyclers with an EV Readiness Checklist,³ Hybrid and Electric High Voltage Vehicle Handling and Dismantling Protocol,⁴ and an EV Battery Data Base.⁵ The EV Battery Data Base contains access to information for 1,650 models from 65 manufacturers specific to over 7,700 different high voltage batteries contained in electric vehicles.

IV. Conclusion

ARA has made it a priority to ensure that our members are heavily engaged in the development of electric vehicle and electric vehicle battery policy. ARA and automotive recyclers have played a key role in other state electric vehicle battery working groups in California, Texas, and Illinois. Furthermore, ARA has been working with the U.S. Department of Energy, U.S. Environmental Protection Agency, U.S. Department of Transportation, Li-Bridge Public Private Partnership, and the California Air Resources Board on electric vehicle and electric vehicle battery policy. As part of this work with federal and state regulators, ARA has developed expertise regarding both barriers and opportunities to scaling up electric vehicle adoption. ARA is also aware of examples of successful policies that promote electric vehicle adoption.

Respectfully,

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² The Automotive Recyclers Association, *Electric and Hybrid Vehicle Technology Guide*, (2020).
<https://arauniversity.org/wp-content/uploads/2021/03/Electric-Vehicle-Training-Final.pdf>.

³ Automotive Recyclers Association University, *EV Readiness Checklist*,
<https://img1.wsimg.com/blobby/go/ce5f5a84-ace1-49a2-8823-f959ad0cdb84/downloads/EV%20Readiness%20CHECKLIST.pdf?ver=1643919686139>.

⁴ Automotive Recyclers Association University, *Hybrid and Electric High Voltage Vehicle Handling and Dismantling Protocol*, <https://img1.wsimg.com/blobby/go/ce5f5a84-ace1-49a2-8823-f959ad0cdb84/downloads/Hybrid%20and%20Electric%20High%20Voltage%20Vehicle%20Handl.pdf?ver=1643919686139>.

⁵ Automotive Recyclers Association University, EV Battery Database, <https://arauniversity.org/resources/ev-battery-data-base/>.