



February 13, 2025

The Honorable Brian Feldman  
Chair, House Education, Energy, and the Environment Committee  
Miller Senate Office Building  
Annapolis, Maryland 21401

**RE: SB 686 - Environment - Extended Producer Responsibility for Batteries and Battery-Containing Products (Battery Stewardship Act)**  
**Position: Favorable with Amendments**

Chair Feldman:

On behalf of the Alliance for Automotive Innovation (Auto Innovators)<sup>1</sup>, I am writing to provide the auto industry's perspective on SB 686 and to request an amendment. Our concern with SB 686, pertains to the potential impact it could have on batteries contained in vehicles other than the lead-acid vehicle battery. Beyond the powertrain battery in electric vehicles and the lead-acid battery many are aware of, vehicles also have smaller batteries in several other locations to keep various systems running. Similar legislation, such as the Illinois Portable and Medium-Format Battery Stewardship Act, ([Public Act 103-1033](#)), has plainly excluded batteries from the definition of a "covered battery" in vehicular uses.

For clarity, we would respectfully request the consideration of an amendment to exclude batteries used in vehicles like the Illinois law.

Autos are the [most recycled](#) consumer product, with 95% of retired passenger vehicles processed for recycling every year. From floor mats and fluids to aluminum and steel, approximately 86% of a car's material content is recycled, reused, or used for energy recovery. With respect to autos, there is an entire scrappage industry with the purpose of taking apart vehicles for their components that can be reused, resold, or recycled. Automakers rely on auto recyclers to remove parts that can be reused or remanufactured for use in other vehicles. These include engines, transmissions, doors, bumpers, starters, alternators, and water pumps. Other parts, like batteries, catalytic converters, tires and some plastics, are removed and recycled into new products. Adding vehicles to the requirements of SB 686 will disrupt the current ecosystem of vehicle recycling which is working well.

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<sup>1</sup> From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers and semiconductor makers – Auto Innovators represents the full auto industry, a sector supporting 10 million American jobs and five percent of the economy. <https://www.autosinnovate.org/>

For these reasons, we request the following amendment:

(2) "COVERED BATTERY" DOES NOT INCLUDE:

- (I) ANY MEDICAL DEVICE, PROVIDED THAT THE MEDICAL DEVICE IS NOT DESIGNED AND MARKETING FOR SALE OR RESALE PRINCIPALLY TO CONSUMERS FOR PERSONAL USE; OR
- (II) A LARGE LEAD ACID BATTERY., OR
- (III) *A BATTERY THAT IS A COMPONENT OF A MOTOR VEHICLE OR INTENDED FOR USE EXCLUSIVELY IN MOTOR VEHICLES.*

Thank you in advance for your consideration of our views. For more information, please contact our local representative, Bill Kress, at (410) 375-8548.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Josh Fisher". The signature is fluid and cursive, with the first name "Josh" and last name "Fisher" clearly distinguishable.

Josh Fisher  
Senior Director, State Government Affairs  
Alliance for Automotive Innovation