

TESTIMONY REGARDING SB686
Being heard by the Maryland Senate Committee on Education, Energy, and the Environment
On Tuesday, February 18, 2025 at 1:00 PM

Dear Chairman Feldman, Vice Chairman Kagan, and Members of the Committee,

Thank you for the opportunity to provide these comments seeking a minor amendment to SB686, Extended Producer Responsibility from Batteries and Battery-Containing Products (Battery Stewardship Act). Tesla's mission is to accelerate the transition to sustainable energy and transportation and a key part of that mission is to ensure Tesla's batteries are reused and recycled. We have worked with legislators across the country to develop battery recycling programs specific to electric vehicle (EV) and energy storage system batteries and would certainly be interested in working with this committee on a similar effort in the future.

Unlike those EV battery efforts, SB686 is focused on other batteries including smaller and medium format batteries. The bill also specifically calls out large lead acid batteries, such as those typically found in vehicles providing low voltage power, as not being included. Maryland already has a regulatory framework in place for recycling those batteries. There has been a lot of advances in low voltage battery technology in recent years, and Tesla recently started to utilize lithium-ion batteries for low voltage power instead of lead acid. Given the size of these batteries, SB686 may inadvertently loop them into a regulatory scheme that does not make sense for them. Given the seemingly clear intent to focus on batteries outside of motor vehicles, Tesla suggests the below amendment to Part VI, 9-1738 (G)(2) that would clarify the bill language in ensure low voltage motor vehicle lithium-ion batteries are not under the scope of the bill.

(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) AN AUTOMOTIVE BATTERY.

I apologize for not being able to be with you in person to share these comments but am available to speak with the committee as it moves forward.

Thank you for your consideration.

Sincerely,



Zachary Kahn
Senior Managing Policy Advisor
Tesla, Inc.