

HB0992_FAV_MedChi_Electronic Device Producer Respo

Uploaded by: Christine Krone

Position: FAV



The Maryland State Medical Society
1211 Cathedral Street
Baltimore, MD 21201-5516
410.539.0872
Fax: 410.547.0915
1.800.492.1056
www.medchi.org

House Environment and Transportation Committee
February 27, 2026

House Bill 992 – *Electronic Device Producer Responsibility Program – Established*
POSITION: SUPPORT

The Maryland State Medical Society (MedChi), the largest physician organization in Maryland, **supports** House Bill 992. House Bill 992 promotes a comprehensive extended producer responsibility program for the recycling and management of electronic waste (“e-waste”) that holds electronic device manufacturers responsible for the full life cycle of their products, especially for recycling and safe disposal. Because of the ubiquity of electronic devices in modern life, e-waste is a rapidly growing waste stream and an increasingly challenging problem in our waste disposal system and for the environment. According to the World Health Organization, e-waste is one of the fastest-growing waste streams in the world. In Maryland, it’s estimated that 20,000 tons of electronics are sent to landfills each year. The improper disposal of e-waste creates three problems: health risks, the waste of valuable resources, and fire safety concerns.

Hazardous substances that are released include lead, mercury, arsenic, polychlorinated biphenyls, hexavalent chromium, polyvinyl chloride, cadmium, flame retardants, selenium, and many others. These toxins can get into our soil, air, and water, leading to health problems, such as respiratory disease, neurological damage, miscarriage, cancer, etc. Like most exposures, the most vulnerable populations, including children, seniors, and those with pre-existing conditions, are at the greatest risk. Another major challenge is that lithium-ion battery fires are becoming increasingly common in Maryland. These fires and fumes are toxic and pose a risk to public and environmental health and safety.

In addition to numerous health risks, e-waste contains valuable metals and rare-earth elements, including gold, silver, copper, palladium, platinum, and cobalt. Discarding these is wasteful and costly. It is estimated that 150 million cell phones are discarded in the US each year. One million cell phones can yield 35,000 lbs. of copper, 772 lbs. of silver, 75 lbs. of gold, and 33 lbs. of palladium. Another example is that one laptop may contain approximately \$13.46 in raw material value. When using raw materials, rather than recovered electronic components, the resource extraction and manufacturing processes can contribute to increased pollution and greenhouse gas emissions.

Maryland has had an e-waste recycling plan based on legislation enacted by the General Assembly (HB575/2005; HB879/2012). These plans have been a good start, but more is needed to keep e-waste out of the waste stream. Since 2014, manufacturers have contributed 6,522,300 pounds of e-waste recycling. By contrast, local governments have recycled 98,811,041 lbs., and the commercial sector (who are not manufacturers) has recycled 75,598,800 lbs. The fiscal and operational burden of this recycling activity falls to local governments, the vast majority of which fund it through local budgets and waste-disposal tipping fees.

Rather than continue to make local governments and taxpayers responsible for these costs, this legislation will shift the burden to the manufacturers of electronic devices. Doing so will result in substantial health, environmental, and safety benefits, as well as more effective management of the life cycles of electronic devices.

House Bill 992 builds on past efforts and moves the State forward by creating a practical and sustainable comprehensive program to more responsibly manage waste from electronic devices. On behalf of Maryland's physicians, MedChi urges a favorable report on House Bill 992.

For more information call:

Christine K. Krone
J. Steven Wise
Danna L. Kauffman
Andrew G. Vetter
410-244-7000

Del Stein Written Testimony_HB 992.pdf

Uploaded by: Dana Stein

Position: FAV

DANA M. STEIN
Legislative District 11B
Baltimore County

Environment and Transportation
Committee

Chair
Environment Subcommittee

Joint Committee on Legislative Ethics



The Maryland House of Delegates
6 Bladen Street, Room 301
Annapolis, Maryland 21401
410-841-3527
800-492-7122 Ext. 3527
Dana.Stein@house.maryland.gov

The Maryland House of Delegates

ANNAPOLIS, MARYLAND 21401

Delegate Stein's Testimony in Support of House Bill 992 Electronic Device Producer Responsibility Program - Established

Chair Korman, Vice Chair Guyton, and Fellow Members of the Environment and Transportation Committee:

As a nation, we spend more than \$160 billion on consumer electronic products every year. These are great products, but their core materials must be managed safely. Some materials are toxic, most are reusable.

This bill deals with the recycling of electronics. But it's also a critical health and safety bill, because fires can be caused by electronics with embedded batteries.

First, the recycling part. Too many electronic products end up in landfills or worse. In 2005, with legislation sponsored by Del. Dan Morhaim, we set up a program that charged manufacturers fees to fund electronic recycling efforts.

Manufacturers were allowed to pay a reduced annual fee of \$500 if they set up their own collection programs for the public. Unfortunately, manufacturer-run collection programs have only captured 2% of total electronics collected under recycling programs (by weight) across the state. The bulk of electronics collected and recycled in Maryland are managed and funded by local governments.

Over time, fees collected by manufacturers have also proven to be inadequate. In only four years was the Maryland Department of the Environment able to provide grants of minimal amounts, \$15,000 in some cases, to localities to underwrite their electronic recycling programs.

As a result, most counties can't afford to recycle all the electronics they collect. Those that can recycle their entire collection overwhelmingly charge fees at the

public drop off or through local taxes. Tens of millions of pounds of electronics are therefore being landfilled in the state every year, due to lack of funding.

This bill would change that. It would set up a modern Electronic Device Producer Responsibility Program (EDPR) program, similar to ones in Oregon and Illinois, for the collection, recycling, refurbishment, and reuse of electronic devices. Producers of electronics would fund the cost of collecting and recycling TV's, laptops, monitors, and other household products through the creation of producer responsibility organizations, known as "PRO." Consumers will not be charged any fees and collectors of end-of-life electronics, such as local governments or retailers, would be fully funded to manage these programs, including their staffing. The bill will apply to in-store and online sales of covered electronics. Producer fees would also fund MDE to administer the program, although many administrative duties could also be shifted to a third-party "Electronic Device Coordinating Body" to streamline the manufacturer reporting and registration responsibilities on behalf of MDE and the PROs.

MDE would see increased funding almost immediately beginning March 2027, before its other program responsibilities kick in, through fees paid into a dedicated account in the State Recycling Trust Fund (SRTF). Mid-sized manufacturers would pay \$5,000 per year and large manufacturers \$10,000 per year to support MDE's administrative costs. These will provide enough funding and time for MDE to hire additional staff before PRO plans are due for MDE review in March 2029.

Most importantly, this bill is more than just a recycling bill. It is a critical health and safety bill.

Fires caused by batteries embedded in electronics are rapidly increasing in Maryland and across the United States. The EPA recently reported there are now 5,000 annual fires across 300 Material Recovery Facilities (MRFs). These incidents put workers at risk along with capital infrastructure like MRFs, transfer stations, collection sites, trucks, and other processing equipment. Our first responders are increasingly being dispatched to battery fires. Consequently, workers and first responders are exposed to more thermal runaway events, including toxic chemical flammable gas production, smoke, explosion, internal pressure rise, vapor cloud, and fire.

This bill will fund equipment and improve workplace safety by funding dedicated staff to monitor, sort, and load all electronic types, ranging from large, heavy TVs to Damaged, Defective, or Recalled (DDR) battery-embedded products requiring special handling.

All in all, this bill is a win for human health, the economy, and the environment. In closing, I would like to acknowledge and thank the Maryland Department of the Environment for their time and effort in working with us on this legislation over the interim. Their feedback has contributed to a much-improved bill and a more manageable program for their staff to implement. I look forward to working with them and incorporating any additional amendments as needed, to finalize this bill for passage this year.

I urge your support.

HB 992 - MoCo DEP - (GA 26) FAV.pdf

Uploaded by: Garrett Fitzgerald

Position: FAV



Montgomery County

Office of Intergovernmental Relations

ROCKVILLE: 240-777-6550

ANNAPOLIS: 240-777-8270

HB 992

DATE: February 27, 2026

SPONSOR: Delegate Stein

ASSIGNED TO: Environment and Transportation

CONTACT PERSON: Garrett Fitzgerald (garrett.fitzgerald@montgomerycountymd.gov)

POSITION: Support (Department of Environmental Protection)

Electronic Device Producer Responsibility Program - Established

House Bill 992 would create a producer responsibility program for electronic devices sold in Maryland. The program would require producers to develop, fund, and implement a plan to provide collection, transportation, and recycling of covered electronic devices at no cost to individuals and small businesses.

Electronic devices are important to manage responsibly and separately from trash and regular curbside recycling. Many of these devices contain materials that are harmful if released to the environment. Electronic devices containing batteries significantly increase the risks of fire when improperly included in trash or recycling containers.

In contrast, the separate collection of electronics for proper reuse and recycling has significant environmental benefits. Electronics contain scarce natural resources, such as gold, silver, copper, cobalt, lithium, and rare earth elements. Reuse and recycling minimize the environmental impacts of mining for these metals, reducing associated energy use and greenhouse gas emissions. Electronics recycling also creates a secure, domestic source of critical materials, some of which are themselves important to producing clean energy infrastructure, supporting broader climate goals.

Montgomery County collects a broad suite of electronics for recycling at its transfer station and has recently expanded curbside recycling to include on-call collection of electronics and household batteries. The County will begin repair clinics this spring to support electronics repair and reduce waste. Approximately 1.3% of municipal solid waste disposed in Montgomery County is composed of electronics. Electronic waste is projected to grow in the future as the rapid development of artificial intelligence prompts faster turnover of technology.

Montgomery County is fortunate to currently have a no-cost contract for electronics recycling, but spent approximately \$4 million on electronics recycling between 2014 and 2023. It is not guaranteed that the County could obtain a no-cost contract during the next procurement, scheduled for FY2029. The bill would make producers responsible for the proper management of the products they put on the market, as well as for funding public education

and ensuring a minimum level of recycling opportunities are available statewide. Importantly, the bill directs producers to enter into agreements with all willing public sector agencies to cover their costs of electronic recycling.

We respectfully request that the Environment and Transportation Committee issue a favorable report on House Bill 992.

02.27.2026_PSI Testimony_MD HB 992.pdf

Uploaded by: Jennifer Schultz

Position: FAV



Scott Cassel
Chief Executive Officer/Founder

February 27, 2026

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House Environment and Transportation Committee
Maryland General Assembly
100 State Circle
Annapolis, MD 21401

Re: SUPPORT – HB 992, Electronic Device Producer Responsibility Program

Dear Chair Korman, Vice Chair Guyton, and Members of the Committee:

Thank you for the opportunity to submit testimony in support of HB 992, which would establish an Electronic Device Producer Responsibility Program to replace Maryland’s current electronics recycling law with an extended producer responsibility (EPR) approach.

Maryland’s current electronics program, known as the Electronics Recycling Health and Safety Modernization Act, passed into law in 2005 as a pilot program for computer recycling. In 2007, the program was made permanent and expanded to cover more electronic devices. The program is managed by the Maryland Department of Environment and funded by covered electronic device manufacturers.

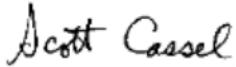
HB 992 aligns with best practices across other EPR electronics programs and includes:

- Convenience standards to ensure equal statewide access to electronics collection sites.
- Performance goals for collection and public awareness of the program.
- Education and outreach requirements to ensure that residents know where, how, and when they can drop off electronics for proper management.
- Expanded coverage of products to include tablets, personal digital assistant devices, monitors, televisions, DVD and VCR devices, small servers, and peripherals (e.g., mouse, keyboard, printers, scanners).
- Allows for a central coordinating body or clearinghouse to ensure program obligations are met and to coordinate reporting if multiple producer organizations are approved by the state.
- Funding mechanism that requires manufacturers to collection, transportation, processing, education and outreach, and government oversight.

PSI is a national policy expert and consulting nonprofit that pioneered product stewardship in the United States. Since 2000, PSI facilitated dialogues, research, pilot projects, and policy development have helped shape more than 146 EPR laws across 21 product categories.

I respectfully urge you to **support HB 992** for the financial and environmental health of Maryland's communities and economy. If you have any questions, please feel free to contact me at (617) 513-3954, or Scott@ProductStewardship.US.

Sincerely,

A handwritten signature in black ink that reads "Scott Cassel". The signature is written in a cursive, slightly slanted style.

Scott Cassel

Chief Executive Officer/Founder

HB0992– Electronic Device Producer Responsibility

Uploaded by: Laurie McGilvray

Position: FAV



Testimony on: HB0992– Electronic Device Producer Responsibility Program
Committee: Environment and Transportation
Organization: Maryland Legislative Coalition Climate Justice Wing
Submitting: Dave Arndt, Co-Chair
Position: Favorable
Hearing Date: February 27, 2026

Dear Chair Korman and Committee Members:

Thank you for allowing our testimony today in support of HB0992, Electronic Device Producer Responsibility Program. The Maryland Legislative Coalition Climate Justice Wing, a statewide coalition of 32 grassroots and professional organizations focused on climate justice, urges you to vote favorably on HB0992.

Almost everyone has one. That box, drawer or shopping bag in a closet filled with old cell phones, obsolete chargers, broken tablets and defunct MP3 players. It is your personal pile of electronic waste. As the useful life of electronic devices becomes shorter and shorter and the list of electronic gadgets we use becomes longer and longer, these piles are getting bigger. They are an increasingly important environmental issue.

There are numerous reasons why we should recycle these devices and keep electronic waste out of landfills:

1. Electronic devices are composed of toxic substances and heavy metals. Materials such as chromium, cadmium, mercury and lead can leach into the soil and contaminate the air and waterways.
2. Recycling this material will save landfill space.
3. Electronic products have valuable materials such as precious metals like gold, silver and platinum along with copper, aluminum, plastic and glass. Through the recycling process, these materials can be reclaimed. Most electronic devices are nearly 100 percent recyclable.
4. Reclaiming valuable materials through recycling means there will be decreased demand for new raw materials. This will help conserve important natural resources.
5. Using recycled material also will help reduce greenhouse gas emissions from manufacturing or processing new products known as “virgin material.” The more recycled material that is available, the lower the demand for virgin material.
6. Discarded electronic devices can be kept out of the landfill if they are refurbished, reused and donated to a worthy cause.

Despite all these benefits, the rates of recycling of electronic waste in Maryland is still very low, estimated to be about 15%. We need to find a better way. HB0992 puts more responsibility on the producers of these products to make sure their products are recycled. The bill will make it easier for consumers to drop off their devices at more convenient and familiar places. A benefit is that when consumers shop for replacement devices, they can conveniently dispose of their old

or nonfunctioning devices. Producers also will have to help educate consumers on the reasons for recycling electronic waste and education is one of the key drivers for increased recycling of all products.

When producers are responsible, it shifts the financial and operational burden of waste management from taxpayers and local governments to producers. It also has been documented that these programs promote sustainable design, increase recycling rates, and reduce waste. A win-win-win.

Accordingly, we urge this committee to issue a FAVORABLE report for HB0992.

350MoCo

Cedar Lane Unitarian Universalist Church Environmental Justice Ministry

Chesapeake Earth Holders

Chesapeake Physicians for Social Responsibility

Climate Law and Policy Project

Climate Communications Coalition

Climate Parents of Prince George's

Climate Reality Greater Maryland

ClimateXChange

Coming Clean Network, Union of Concerned Scientists

DoTheMostGood Montgomery County

Echotopia

Elders Climate Action Maryland

Fix Maryland Rail

Glen Echo Heights Mobilization

Greenbelt Climate Action Network

HoCoClimateAction

Howard County Indivisible

Maryland Legislative Coalition

Maryland Energy Advocates

Maryland Third Act

Mizrahi Family Charitable Fund

Mobilize Frederick

Montgomery County Faith Alliance for Climate Solutions

Montgomery Countryside Alliance

Mountain Maryland Movement

Nuclear Information & Resource Service

Progressive Maryland

Safe & Healthy Playing Fields

Sierra Club Maryland Chapter

Takoma Park Mobilization Environment Committee

The Climate Mobilization MoCo Chapter

Unitarian Universalist Legislative Ministry of Maryland

HB0992-ET-FAV.pdf

Uploaded by: Nina Themelis

Position: FAV



BRANDON M. SCOTT
MAYOR

*Office of Government Relations 88 State Circle
Annapolis, Maryland 21401*

HB 0992

February 27, 2026

TO: Members of the Environment and Transportation Committee
FROM: Nina Themelis, Director, Mayor's Office of Government Relations
RE: House Bill 0992: Electronic Device Producer Responsibility Program – Established

POSITION: SUPPORT

Chair Korman, Vice Chair Guyton, and members of the Environment and Transportation Committee, please be advised that the Baltimore City Administration (BCA) **supports** House Bill (HB) 992.

HB 992 will update the current law and provide a sustainable funding source to Baltimore City and other collectors. Since 2012, Baltimore City has recycled over 8,000,000 pounds of electronics received at our public collection sites, costing over \$1,000,000 to do so.

As the City expands its zero waste programs, most recently adopting textile, mattress and expanded electronics recycling programs, it comes at a contractual cost when hiring companies to collect and recycle this material. It also comes at a logistical cost to onsite operations staff, increasing their responsibilities by requiring more material specific segregation oversight, also impacting traffic flow and contractor coordination.

This bill will fund our electronics recycling contracts and dedicated staff for receiving and packaging electronics in busy public drop-off areas, improving workplace safety, especially with heavy and bulky items. It will fund the City to hire trained staff to ensure proper storage and safe segregation of battery-embedded products, and special handling for damaged, defective, or recalled items that tend to ignite. Electronics battery fire incidents have already occurred at the City's facilities.

With an increasing amount of electronics entering the market, it is paramount that there is a coherent and sustainable financial plan to handle the material and battery fires that come from them. HB 992 provides that framework.

For these reasons, the BCA respectfully requests a **favorable** report on HB 992.

HB0992 Electronic Device Favorable Kranz 2-27-26.

Uploaded by: Rhonda Kranz

Position: FAV

Testimony on: HB0992– Electronic Device Producer Responsibility Program
Committee: Environment and Transportation Submitting: Rhonda Kranz
Position: Favorable
Hearing Date: February 27, 2026

Dear Chair Feldman and Committee Members:

Thank you for accepting my written testimony in support of HB0992, Electronic Device Producer Responsibility Program.

Electronic waste is composed of dangerous pollutants and toxins and heavy metals. These end up in our soil and in our waterways. I live near Sligo Creek, a tributary of the Anacostia River that flow through a heavily paved urban area with a lot of development. Heavy metals and other pollutants are found in the creek. It is also in a neighborhood park where children play and wade in the water.

Over the decades I have seen, and been part of the growth in electronic purchases, and waste. What do we do with our old phones and computers? It is a question I hear and am asked frequently. There are a few places to drop off some specific types of devices, but it is inadequate or hard to find, so they go in to the trash and eventually in to our already waning land fill spaces. There is also the loss of precious metals like gold, copper, and aluminum. These are not only costly but their mining and production have large environment costs.

Electronic devices can often be refurbished and reused. They can be donated to schools or made available to people that cannot afford to buy them. My phone and computer are both refurbished and are giving me years of good use. And even those devices that cannot be reused are valuable; most electronic devices are nearly 100 percent recyclable. Despite the desire of many people to recycle their electronic devices the rates are extremely low Maryland, about 15%.

HB0992 moves us forward by putting more responsibility on the producer to make sure their products are recycled. It will encourage recycling by making it easy to drop off devices in numerous and easily accessible places. It will also have an educational component as producers will have incentives to help educate consumers on reasons for recycling. It will also the cost savings to taxpayers and local governments to address waste management of these devices.

Programs like this have successfully worked elsewhere and would be a cost effective, environmentally safe, and much welcome program for Maryland.

For these reasons, I urge a FAVORABLE report for HB0992.

HB0992_Testimony_Dr_Cashenna_Cross.pdf

Uploaded by: Dr Cashenna A Cross

Position: FWA

Testimony on House Bill 0992 Electronic Device Producer Responsibility Program Position: Favorable With Amendments

Chair and Members of the Committee:

My name is The Honorable Dr. Cashenna A. Cross. I submit this testimony as a municipal leader, a retired United States Air Force veteran, and a public servant committed to transparency, environmental stewardship, and responsible governance that protects both communities and taxpayers.

House Bill 0992 presents an important opportunity for Maryland to modernize how electronic waste is managed across our State. The rapid growth of consumer technology has created a parallel growth in discarded electronic devices. These materials contain components that, if improperly handled, create environmental risks, public health concerns, and long-term financial burdens for local jurisdictions.

The core concept of producer responsibility is sound. Shifting the lifecycle responsibility of electronic devices toward manufacturers encourages innovation, reduces landfill pressure, and aligns financial accountability with those best positioned to design sustainable systems. From a municipal perspective, this approach has the potential to relieve local governments from absorbing costs that were never intended to fall on taxpayers.

However, while the intent of the bill is strong, several implementation concerns must be addressed to ensure successful execution without unintended consequences for municipalities, small jurisdictions, and underserved communities.

First, municipalities must not inherit indirect administrative or operational burdens. Local governments often become the default coordinators of state programs when operational gaps emerge. The legislation should clearly state that participation by municipalities is voluntary and that no unfunded mandates may be imposed through regulation or program design.

Second, equitable access must be strengthened. While statewide collection targets are established, additional safeguards are needed to ensure smaller municipalities and historically underserved communities receive consistent and convenient service. Environmental justice must be measured not only by policy language but by actual accessibility on the ground.

Third, transparency and accountability mechanisms should be enhanced. Producer responsibility organizations must provide clear reporting accessible to local governments and residents, including collection performance, compliance status, and measurable program outcomes. Government credibility depends on the public's ability to see results and understand how decisions affect their communities.

Fourth, coordination with existing municipal recycling systems must be explicitly protected. Local recycling programs have invested resources and built trusted community relationships. The State should ensure integration rather than disruption of systems already serving residents.

My support for this legislation reflects a belief that good governance requires ownership of policy outcomes. Environmental progress and fiscal responsibility are not competing priorities. They are complementary when programs are structured with clarity, fairness, and accountability.

With the recommended amendments addressing municipal protections, equitable implementation, and transparent oversight, House Bill 0992 can become a model policy that advances sustainability while respecting local governance and taxpayer responsibility.

Thank you for your consideration and for your continued commitment to policies that move Maryland forward responsibly.

Respectfully submitted,

The Honorable Dr. Cashenna A. Cross Councilwoman At Large, City of Glenarden Retired
United States Air Force Veteran Maryland Municipal Leader

MDE HB 992 SWA.pdf

Uploaded by: Jeremy D Baker

Position: FWA



**The Maryland Department of the Environment
Secretary Serena McIlwain**

***House Bill 992
Electronic Device Producer Responsibility Program – Established***

Position: Support with Amendments
Committee: Environment and Transportation
Date: February 27, 2026
From: Jeremy D. Baker, Director of Government Relations

The Maryland Department of the Environment (MDE) **SUPPORTS** HB 992 **WITH AMENDMENTS**.

Bill Summary

HB 992 would establish a separate covered electronic device producer responsibility program. This includes approving stewardship organization(s) plans and annual reports, associated review fees, and reimbursement of certain activities. Under the bill, an electronic device manufacturer has to meet certain requirements prior to distributing covered electronics into the state. HB 992 establishes an Advisory Council and requires MDE to adopt regulations to implement, review, and approve plans to manage the program. The bill also alters or eliminates certain aspects of the current covered electronics devices law.

Position Rationale

MDE supports initiatives to divert electronic waste from final disposal, particularly through well-funded programs that align with the State's sustainable materials management goals. The Department supports the intent of this legislation and offers several recommendations to ensure the bill is practical and effectively implementable.

MDE recommends maintaining the existing framework of "free" takeback programs to provide consumers with robust diversion options and supports removing the reduced \$500 fee to better offset agency startup costs. The Department suggests simplifying the definitions of "covered electronic device," "computer," and "white goods" to accommodate future technological shifts without requiring statutory changes, specifically proposing a broad dictionary-based definition for "computer." To ensure clarity and prevent regressive policy shifts, the bill should explicitly list exclusions rather than inclusions, particularly as cellphones are already covered under Maryland's current electronics recycling law.

MDE suggests expanding the bill's scope from "sell or offer for sale" to "distributed or for sale or offer to sell" for any products not part of an approved plan within the established timeframes. To ensure measurable success, the Department recommends including specific, date-certain targets for recycling, capture, reuse, and refurbishment that align with existing Maryland producer responsibility statutes. To provide necessary administrative flexibility, the phrase "in regulation" should be removed in several parts

Contact: Jeremy Baker, Director of Government Relations
Cell: 443-931-0937, Email: jeremy.baker@maryland.gov

of the statute allowing MDE to utilize guidance where appropriate. Removing this language does not prohibit the department from adding requirements in regulation if the authorizing statute already exists.

Environmental sound management practices should be defined to include modulation factors that reward more recyclable or repairable devices, consistent with other state programs. Additionally, HB 992 must be amended to include a specific deadline for plan submissions to ensure the Department can meet its subsequent regulatory obligations.

The bill should also be amended to clearly outline requirements for producer plans, including fund distribution, audit reimbursements, convenience standards, and notifications for non-compliant devices. MDE recommends extending record-keeping requirements to align with existing state laws to prevent data loss and assigning producer registration duties to the responsibility organization, as is standard in Maryland's paint and packaging & paper products laws. Furthermore, weight reporting for refurbished or resold devices must be required to maintain accurate county data under the Maryland Recycling Act. Finally, MDE suggests adding a Department representative as a non-voting member of the advisory council to facilitate ongoing coordination.

MDE has been working with advocates and the sponsor on bill language, and plans to submit amendment requests for HB 992.

Accordingly, MDE asks for a **FAVORABLE WITH AMENDMENTS** report for HB 992.

CTA_Testimony_HB992_2_27_26.pdf

Uploaded by: Katie Reilly

Position: FWA



1919 S. Eads St.
Arlington, VA 22202
703-907-7600
CTA.tech

Committee: Environment and Transportation
Testimony on: HB 992 Electronic Devices Producer Responsibility Program
Position: Favorable with Amendments
Hearing Date: February 27, 2026

Dear Chair Korman, Vice Chair Guyton, and Members of the Committee:

On behalf of Consumer Technology Association (CTA), we respectfully urge a favorable report with amendments for HB992, establishing a producer responsibility program for electronic devices.

CTA is the trade association representing the U.S. consumer technology industry, including manufacturers of the electronic devices in scope of the requirements in HB992. Our members are the world's leading innovators – from startups to global brands to retailers – helping support more than 18 million American consumer technology jobs. As an industry, we have supported the proper collection and recycling of electronics at end of life via voluntary, manufacturer led programs in combination with state mandated programs ensuring electronics are sent to responsible, certified electronics recycling facilities across the U.S.

For the past two decades, CTA's member companies established and operated extended producer responsibility (EPR) programs in 24 states plus the District of Columbia. In fact, Maryland has an existing EPR law for electronics which passed in 2005.¹ Maryland's current law is a unique structure that does not mirror any other state.

It is important to understand that electronics do not follow a standard EPR model like paint or mattresses. There is no single Producer Responsibility Organization (PRO) that operates for electronics here in the U.S. Since the first law passed 20 years ago, the states that have adopted EPR for electronics have not followed one standard model. Instead, the industry has explored numerous program structures and learned along the way what works best and what has presented challenges. Several states have updated existing laws in recent years and programs require engagement across all stakeholders to respond to the needs of individual state structures.

At the core, an EPR structure for electronics must be market driven. Unlike EPR for other products, there are unique concerns with electronics that drive the need for a more unique approach including concerns on protecting data in the recycling system and international restrictions around the movement of certain commodity types generated from the electronics

¹ More information on Maryland's eCycling program can be found at <https://mde.maryland.gov/programs/land/WasteManagement/Pages/eCycling.aspx>.

recycling process. In other words, recycling an electronic is not the same as recycling a cardboard box or aluminum can.

What Industry Supports

We appreciate the intent of HB992 to update Maryland's existing electronics EPR program. There are several areas of commonality from a high-level perspective which CTA supports including:

- Increasing free and convenient recycling opportunities for consumers once electronic devices reach their end of life;
- Fair financial compensation for local governments; and
- Manufacturer vetted and approved electronics recyclers.

However, like any legislation, the details are extremely important, and there are several areas where the language in HB992 is misaligned with industry's position on electronics EPR. Therefore, CTA is seeking amendments to HB992 and is working with Delegate Stein and Senator Augustine (the author of the Senate cross-file, SB655).

Challenges with HB992

There are several areas of concern for CTA in the current language which includes:

- **Clearinghouse Structure vs. Traditional PRO:** As tested in states like Illinois, a manufacturer clearinghouse should serve in lieu of a single (or traditional) PRO and coordinate among manufacturer plans (independent or group plans) to ensure convenient coverage and consumer education in the state and submit information (plans, reports) to the Maryland Department of the Environment (MDE).
 - While the bill allows for collaboration via a clearinghouse, that only occurs after plans are submitted to MDE. Coordination must occur ahead of plan submission as we have learned the challenges of coordinating after plan submission in Oregon.
 - Electronics EPR programs must be market driven and therefore a single (or traditional) PRO structure does not work for electronics. Additionally, manufacturers must retain control of working with their preferred electronics recycling partners who are vetted and audited against both industry and individual manufacturer standards. This ensures devices and the commodity outputs are being properly managed along with the personal data contained on many electronic devices.
 - MDE must be responsible for manufacturer registration, market share determination, plan and annual report approvals, and enforcement over the program. However, the Clearinghouse will help streamline the submission of information into MDE providing needed program efficiencies.
- **Consumer Focus:** The focus must be on recycling electronics at end of life from consumers (aka households) within Maryland. Businesses and public sector entities can include end of life management as part of their service contract when purchasing electronic devices and should not be covered by an EPR program. The requirement to collect electronics from businesses and public sector entities should be removed.
- **Recycling Focus:** While reuse of products should be encouraged, reuse should not be part of an EPR system. EPR is meant as a financing mechanism for products at their

end of life; not for products entering their second life or beyond. The language in HB992 needs clarified to ensure the focus is on recycling products at end of life only.

- **Avoid Added Bureaucracy:** The proposal calls for an Advisory Board which creates unnecessary bureaucratic structure and oversight that could instead be managed directly by MDE via plan approval. Many program requirements that could be easily incorporated into the legislation are also left to the regulatory development process, adding more burden for MDE. Streamlining a program that can get off its feet quickly should be the priority.
- **New Products for EPR:** CTA recognizes that new devices may need to enter the electronics EPR system but does not support the ability of MDE to add products via regulation. Rather, this is the appropriate use of an advisory council that could evaluate new products against compatibility with the electronics collection and recycling infrastructure along with other factors and make recommendations to the legislature to add new products to the electronics EPR system.

There are additional concerns and CTA welcomes the opportunity to discuss the details of the proposed legislation with the Committee.

Next Steps for HB992

CTA looks forward to continued engagement with the Environment and Transportation Committee as well as Delegate Stein on amendments to address the above concerns. We appreciate the collaboration to date and look forward to future discussions.

If you should have any questions, please do not hesitate to contact me at kreilly@cta.tech.

Sincerely,



Katie Reilly
VP, Environmental Affairs and Industry Sustainability
Consumer Technology Association

MDCC_HB 992_Unfavorable.pdf

Uploaded by: Grason Wiggins

Position: UNF



House Bill 992

Position: Unfavorable

Committee: Environment and Transportation

Date: February 27, 2026

Founded in 1968, the Maryland Chamber of Commerce (the Chamber) is the leading voice for business in Maryland. We are a statewide coalition of more than 7,000 members and federated partners working to develop and promote strong public policy that ensures sustained economic health and growth for Maryland businesses, employees, and families.

House Bill 992 (HB 992) would impose significant new regulatory, financial, and administrative burdens on companies operating in Maryland. The bill establishes a new producer responsibility framework that shifts the operational and financial obligations for the collection and recycling of electronic devices directly onto manufacturers and sellers. As written, the proposal creates uncertainty, increases compliance costs, and risks undermining Maryland's competitiveness in the technology and retail sectors.

Increased Costs for Businesses and Consumers

HB 992 requires manufacturers to join or form producer responsibility organizations, submit detailed plans to the state, pay registration and review fees, and meet performance requirements under threat of sales prohibitions. These mandates will generate substantial compliance costs, particularly for small and mid-sized businesses that lack the administrative infrastructure to manage such programs. Inevitably, these costs will be passed along to Maryland consumers through higher prices on essential electronic products used by families, students, schools, and small businesses.

Supply Chain and Market Disruptions

The bill authorizes prohibiting the sale of devices from manufacturers that fail to meet program requirements. This enforcement mechanism could lead to product shortages, limit consumer choice, and disrupt supply chains—especially for emerging technology companies and smaller producers unfamiliar with Maryland-specific requirements.

Need for Collaborative Solutions

We urge the committee to pursue more balanced and collaborative approaches that expand recycling access without imposing rigid mandates. Incentive-based programs and regional coordination would better support environmental goals while preserving economic growth and innovation.

Maryland's business community remains committed to sustainable practices and responsible product stewardship. However, SB HB 992, as currently drafted, would place disproportionate burdens on employers, raise costs for consumers, and create unnecessary regulatory complexity. **For these reasons, the Maryland Chamber respectfully requests an unfavorable report on HB 992.**

