

April 16, 2021

Senator Christopher Bray  
Chair, Senate Committee on Natural Resources and Energy  
Vermont State House  
115 State Street  
Montpelier, VT 05633-5301

cc: Members, Senate Committee on Natural Resources and Energy

**Re: Support for S. 126**

Dear Chair Bray and Committee Members:

On behalf of the Consumer Technology Association (CTA), thank you for opportunity to provide comments outlining our support for S. 126, a bill to modernize the 100% manufacturer-funded Vermont Electronics Recycling Program. The primary change in this bill is to shift some administrative responsibilities currently under DEC to the manufacturers of electronics who pay for the recycling program.

CTA is the trade association representing the U.S. consumer technology industry. Eighty percent of CTA's nearly 2,000 member companies are small businesses and startups; others are among the world's best-known manufacturing and retail brands of consumer electronics including televisions and computers. Our member companies have long been recognized for their commitment and leadership in innovation and sustainability.

**What the Bill Does**

This legislation shifts several administrative functions to a "manufacturer clearinghouse" which is our industry's version of a Producer Responsibility Organization (PRO). The bill also maintains very active regulatory oversight of the recycling program with annual plan approval required by the Department of Environmental Conservation.

There are also two important program updates that were not included when this program was enacted a decade ago. First, it incorporates incentives for improved new product design/environmental performance. Second, it directs the Department to minimize greenhouse gas emissions when reviewing the annual plan.

**What the Bill Does Not Do**

The bill does not reduce collection opportunities provided to Vermont residents. Nor does it change the producer-paid financing model, the manufacturer registration fees paid to the

Department, program recycling standards, the scope of electronics covered in the program, nor who in Vermont is eligible to receive recycling services provided by the program.

Thank you again for the opportunity to voice our support for this legislation. If you have any questions, please do not hesitate to contact me at [walcorn@cta.tech](mailto:walcorn@cta.tech).

Sincerely,

A handwritten signature in black ink, appearing to read "Walter Alcorn", with a long horizontal flourish extending to the right.

Walter Alcorn  
Vice President, Environmental Affairs and Industry Sustainability  
Consumer Technology Association