



March 31, 2013

House Committee on Finance
Rep. Sylvia Luke, Chair
Rep. Scott Y. Nishimoto, Vice Chair
Rep. Aaron Ling Johanson, Vice Chair
Hawai'i State Capitol
Honolulu, HI 96813

**RE: Hawai'i Senate Bill 1135 HD1: Electronic Device Recycling Act
OPPOSE**

Dear Representatives Luke, Nishimoto, Johanson, and Committee Members,

The Technology Association of America (TechAmerica) must respectfully remain opposed to **SB 1135 HD1**, which would create an expanded electronic device recycling program in Hawai'i. While we appreciate and support the effective management of electronic waste, we do not believe that this bill yet represents an efficient or practical approach to achieving such ends. Instead, we would encourage the Legislature to consider more incremental changes to the existing law that encourage greater rates of recycling in Hawai'i.

TechAmerica is the leading voice for the U.S. technology industry – the driving force behind productivity growth and job creation in the United States and the foundation of the global innovation economy. Our member companies are leaders in environmental sustainability, renowned for their proactive efforts to reduce the environmental impacts of their products throughout the product lifecycle: from design, to use, to end-of-life.

First, we appreciate the significant changes that have been made to SB 1135 throughout the legislative process that address some of the concerns articulated by industry stakeholders. Most recently, we appreciate the removal of the specific, increasing mandatory recycling rates for manufacturers from the bill.

However, we still believe that this bill represents a significant rewrite of Hawaii's existing e-waste law and that a more nuanced approach could be undertaken to refine the current law where necessary and achieve the meaningful gains in recycling that all stakeholders desire.

For example, the convenient collection requirements in the bill based on geography and population are unnecessary and continue to be problematic. We additionally remain concerned with Section 339D of the bill which requires manufacturers to reimburse county agencies for any collection of

devices undertaken by the county and made available to the manufacturer. We believe that, at a minimum, both the convenient collection requirements and county reimbursement provisions should be removed from the bill.

For these and other reasons, TechAmerica must respectfully remain **OPPOSED** to **SB 1135 HD1**. If you have any questions, I can be reached at (916) 443-9088 or robert.callahan@techamerica.org.

Sincerely,

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

Robert Callahan
Director, State Government Affairs
California & Hawai'i

cc: The Honorable Donna Mercado Kim, Hawaii State Senate