January 19, 2026

House Committee on Environment and Agriculture
New Hampshire State Legislature

RE: HB 1602 – Redwood Materials – Oppose Unless Amended – Safe Battery Collection and Recycling Stewardship

Chair Aron, Vice-Chair Barbour and the Members of the House Committee on Environment and Agriculture:

On behalf of Redwood Materials, we write to express our serious concerns with **HB 1602** in its current form. While we support the bill's intent to enhance battery safety and promote responsible environmental stewardship, the legislation as drafted does not adequately account for battery collection and recycling services already being provided by trusted, experienced operators such as Redwood Materials. We believe that with a few targeted amendments, this legislation – and the battery recycling program it establishes – will achieve higher battery collection rates and deliver meaningful improvements to battery safety across New Hampshire.

About Redwood Materials
Redwood Materials operates across the full lifecycle of end-of-life batteries and plays a number of roles under battery EPR laws such as this one. We recycle the batteries collected under battery stewardship laws, serve as a battery stewardship organization or stewardship partner for producers that choose to self-represent, and operate independent battery collection programs outside of stewardship organizations.

Our operations include battery collection, repurposing, recycling, and the recovery of materials for reuse in new battery manufacturing. Redwood currently processes more than 20 GWh of lithium-ion batteries each year, representing approximately 250,000 electric vehicles or 60,000 metric tons of material annually. We provide free battery collection services to consumers, businesses, and municipalities, and through our consumer battery collection program have already recovered more than 100,000 pounds of batteries for recycling.

Redwood's consumer battery collection program includes:

- **Battery Bins –** A first-of-its-kind, patented system that safely stores, packages, and monitors hundreds of batteries or battery-containing devices with zero preparation required; no taping, bagging, sorting, or disassembly. Inside, automated sensing, spatial packing, and real-time condition monitoring quietly manage every item, making it the first public-facing collection technology built to handle mixed chemistries and devices at scale with fire-safe storage and continuous monitoring.
- **Events** – Consumers can recycle their end-of-life batteries by attending one of our community collection events that we host in partnership with Rotary Clubs, schools, local governments, and other civic and service-oriented organizations.
- **Education** – We believe education is essential to battery recovery. That's why we created Redwood's *Advocate Toolkit*—a comprehensive resource covering the basics of battery and device recycling, along with guidance on how individuals and communities can contribute to a cleaner energy future. In addition

to our toolkit, we also curate tailored education programs and marketing campaigns in partnership with partners on the ground.

Proposed Amendments to HB 1602

To ensure New Hampshire develops a best-in-class battery EPR program, Redwood recommends the state consider the following bill amendments:

1. **Allow for the Independent Collection of Covered Batteries Outside of a Battery Stewardship Organization**

   Qualified entities such as advanced battery recyclers must be free to collect, transport, and recycle covered batteries by any lawful method independent of a battery stewardship organization (BSO), with no obligation to forfeit material to a BSO and no artificial limits on collection models (e.g., fee-based household pickup, mail-back, drop-off sites, community events, curbside pilots, or other innovative approaches). So long as appropriate information is reported to help meet statewide collection goals, this approach simply allows recyclers to continue doing what they are already doing, serving as a complement to battery stewardship programs by further expanding pathways and increasing convenience for consumers.

2. **Define Advanced Battery Recyclers, Metal Recyclers and MRFs and Require BSO's to Coordinate with Advanced Battery Recyclers for the End-of-Life Management of Covered Batteries**

   To address the unique safety, environmental, and material-recovery considerations of covered batteries, the bill should define "advanced battery recyclers" as entities with the expertise and technology to responsibly process—and truly recycle—these batteries, rather than simply collect or consolidate them. The state should also define and acknowledge the important roles of other recycling stakeholders, such as electronic recyclers, metal recyclers and MRFs who often encounter covered batteries and may partner with advanced battery recyclers like Redwood Materials for safe and efficient downstream processing.

   Critically, this policy recommendation should require battery stewardship organizations to coordinate with advanced battery recyclers for the end-of-life management of covered batteries – ensuring not just collection, but full recycling by facilities capable of processing batteries and remanufacturing the recovered materials into new, battery ready inputs. With this addition, New Hampshire can ensure that valuable materials are truly reintegrated into a domestic circular supply chain, reducing reliance on foreign sources of critical minerals, strengthening U.S. manufacturing, and lowering the cost of essential clean energy technologies such as electric vehicles and battery energy storage systems.

3. **Allow Multiple Battery Stewardship Organizations to Collectively Meet Statewide Convenience Goals, Manage Their Own Battery Formats, and Be Administered Equitably by the State**

   For multiple Battery Stewardship Organizations (BSOs) to operate effectively, **the state should establish statewide performance goals and convenience standards that all approved BSOs may collectively satisfy.** This approach ensures comprehensive statewide coverage while allowing multiple organizations to participate without duplicating infrastructure or imposing unnecessary costs.

Each BSO should be responsible only for the collection and management of the battery format(s) placed on the market by the producers it represents. This structure prevents cross-subsidization between unrelated battery markets, promotes fair cost allocation among producers, and aligns each BSO's responsibilities with its technical expertise and operational capacity. Similar frameworks have proven effective in e-waste stewardship programs, where multiple organizations operate concurrently while collectively meeting statewide obligations. Battery formats vary significantly in size, chemistry, safety risk, and handling requirements. Medium-format batteries—such as those used in e-bikes, scooters, and power tools—require different safety protocols, transportation methods, and processing infrastructure than small portable batteries. Allowing BSOs to focus on the formats they represent improves safety, efficiency, and material recovery outcomes while avoiding unnecessary duplication of systems and oversight.

Finally, **state administrative fees should be structured equitably** to reflect the size and scope of each BSO, including the number of producers represented and their relative market share. Aligning fees with program scale ensures fairness among BSOs, better reflects the level of regulatory oversight required, and avoids placing disproportionate administrative burdens on smaller or specialized programs.

Redwood is committed to keeping batteries out of landfills and building a robust domestic battery recycling ecosystem. We stand ready to partner with New Hampshire to develop the most effective battery recovery program possible. We respectfully urge the adoption of these recommended battery EPR program elements, which will position New Hampshire to lead in implementing a modern, effective stewardship framework that supports private-sector innovation, enhances consumer convenience, drives higher recovery rates, and advances the state's clean energy goals.

We appreciate your attention to this matter and look forward to your support in making these necessary amendments to **HB 1602.**

Sincerely,

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