Battery Council International
2001 K Street NW, 3rd Floor N
Washington DC 20006

January 20, 2026

The Honorable Judy Aron, Chair
House Environment & Agriculture Committee
The General Court of New Hampshire
107 North Main Street
Concord, NH 03301

RE: BCI Testimony on HB 1602 – An Act creating a safe battery recycling stewardship program – Neutral / Information Only

Chair Aron, Vice Chair Barbour, and Members of the Committee:

Thank you for the opportunity to provide testimony on HB 1602, which would establish a new battery collection and recycling stewardship program in New Hampshire. BCI is the leading trade association for the North American battery industry. BCI's member companies include battery manufacturers, suppliers, retailers, and recyclers of lead and other battery chemistries. This testimony is offered to support the development of safe, accessible, and effective collection and recycling programs for lithium-ion and other non-lead battery chemistries, while also providing important context on the existing lead (Pb) battery recycling system and the importance of preserving it.

HB 1602 addresses a real and growing need: the development of collection and recycling infrastructure for lithium-ion and other emerging battery technologies. HB 1602 also rightfully exempts most lead batteries. Lithium-ion batteries, for example, are increasingly used in consumer electronics, tools, and mobility devices, and they present distinct safety, logistical, and economic challenges at end of life.

Disposal bans alone do not create collection infrastructure. Stewardship programs can play an important role in expanding collection access, improving handling practices, and ensuring manufacturer responsibility for batteries that are not yet supported by mature recycling systems. Lithium-ion batteries, in particular, require specialized handling and are associated with well-documented fire risks at waste and recycling facilities, underscoring the need for thoughtfully designed programs.

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As stewardship frameworks are developed, it is important to recognize that different battery chemistries require different solutions based on their market value, safety profile, and existing infrastructure.

HB 1602 appropriately recognizes these differences by exempting most lead batteries from the new stewardship program. This exemption is important and necessary, as lead batteries are already subject to comprehensive state and federal regulations and are supported by a highly effective, well-established recycling system.

Last year, the U.S. Geological Survey (USGS) added lead metal to the list of U.S. Critical Minerals, highlighting the strategic importance of preserving the nation's most successful domestic critical mineral supply chain. Lead is unique among critical minerals in that it is supported by a fully domestic, closed-loop recycling system. Lead is also infinitely recyclable.

Lead batteries power virtually every vehicle on the road and support essential infrastructure, including telecommunications, hospitals, utilities, and emergency systems. Across North America, lead batteries achieve a recycling rate of approximately 99%, with more than 6.5 billion pounds of used batteries recycled annually.[1] The recovered material flows directly back into battery manufacturing, sustaining a domestic industry that supports more than 100,000 jobs and contributes roughly $15 billion in annual GDP.[2]

This system reflects decades of investment, clear legal obligations, and aligned economic incentives. It is a manufacturer-operated, market-based model, codified in law in more than 40 states, that operates at no cost to consumers or taxpayers. It requires no public subsidies, no centralized bureaucracy, and no intermediaries, and it is widely viewed as a model of effective product stewardship.

Well-intentioned "all battery" Extended Producer Responsibility (EPR) proposals risk unintentionally disrupting this successful lead battery system by treating fundamentally different materials as if they share the same characteristics.

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[1] National Recycling Rate Study. *See*: https://batterycouncil.org/resource/national-recycling-rate-study/. (Last accessed January 18, 2026.)
[2] United States Lead Battery Industry Segment Economic Contribution in 2023. *See*: https://batterycouncil.org/news/new-study-u-s-lead-battery-industry-2025/. (Last accessed January 18, 2026.)

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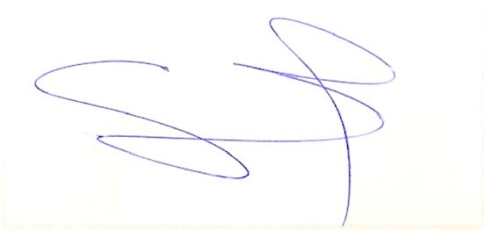
Combining lead and lithium-ion batteries into a single collection and processing framework, for example, would increase costs and safety risks. Lithium-ion batteries require additional handling and packaging measures, among others. These risks are not present in the lead battery system, which has been optimized over decades.

There are also important economic differences. Lead batteries have positive material value, which supports efficient recycling. In contrast, many lithium-ion batteries remain a negative-value waste stream, where recycling costs can exceed the value of recovered materials. Merging these systems would shift costs rather than improve efficiency.

HB 1602 presents an opportunity to address the growing need for safe lithium-ion battery recycling while preserving a proven system that already delivers exceptional environmental and economic outcomes. By supporting new stewardship programs where they are needed—and maintaining the exemption for lead batteries that are already regulated and highly effective—New Hampshire is building on success rather than disrupting it.

Thank you for your consideration. Please do not hesitate to contact me if you have any questions or want to discuss the issue further.

Respectfully submitted,
Susan E. Bernard



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