



February 25, 2026

Committee on Environment and Natural Resources  
c/o Legislative Information Office  
100 State House Station  
Augusta, ME 04333

RE: LD 474, An Act to Establish a Stewardship Program for Primary and Rechargeable Batteries

Dear Senator Tepler and members of the Committee on Environment and Natural Resources:

On behalf of the Alliance for Automotive Innovation<sup>1</sup>, thank you for the opportunity to provide written testimony on LD 474, legislation creating a stewardship program for consumer products containing batteries. Focused on creating a safe and transformative path for sustainable industry growth, Auto Innovators represents the automakers responsible for producing most of the new cars and light trucks sold in the U.S. each year, as well as major Tier 1 suppliers and other automotive technology companies.

Automakers and their suppliers take issues around chemical usage very seriously and are always looking for substitute compounds that can perform the same job with a lower environmental impact. Examples of such advancements are truly too long to list, but a representative sample can include the industry's move to water-based paints, the use of soy-based foams in car seats and dashboards, the move away from lead in wheel weights and copper in brake pads, and the ongoing process to substitute a variety of flame retardants while still meeting Federal Motor Vehicle Safety Standards regarding flammability.

Our concern with the proposed amendment to LD 474, however, pertains to the potential impact it could have on batteries contained in vehicles. Beyond the powertrain battery in electric vehicles and the lead-acid battery many are aware of, vehicles also have smaller batteries in a number of other locations to keep various systems running. For example, Tire Pressuring Monitoring Sensors (TPMS) typically use sealed batteries that last up to 10 years and are generally not designed to be replaced, requiring complete sensor replacement when the battery dies. In addition, some vehicle security systems are also equipped with a reserve battery to provide power if the vehicle battery is otherwise unable to power those critical systems.

Several states with similar laws have recognized that batteries embedded in vehicle systems are different from other consumer-facing products and exclude such batteries from the scope of legislation. For example, the Illinois Portable and Medium-Format Battery Stewardship Act, Public Act 103-1033 (<https://www.ilga.gov/legislation/publicacts/103/PDF/103-1033.pdf>), has plainly excluded from the definition of a "covered battery" vehicular uses.

For clarity, we would respectfully request the committee's consideration of an amendment to exclude batteries used in vehicles, such as adding to the definition of a "covered battery" and what it does not include by inserting the following new language:

***A that is a part of a motor vehicle, or a component part of a motor vehicle assembled by or for a vehicle manufacturer or franchised dealer, including replacement parts for use in a motor vehicle.***

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<sup>1</sup> From the manufacturers producing most vehicles sold in the U.S. to autonomous vehicle innovators to equipment suppliers, battery producers and semiconductor makers – Alliance for Automotive Innovation represents the full auto industry, a sector supporting 11 million American jobs and five percent of the economy. Active in Washington, D.C. and all 50 states, the association is committed to a cleaner, safer and smarter personal transportation future.

Alternatively, California's battery recycling program offers a definition of "covered-battery-embedded product" that aligns with the goals of LD 474 while recognizing that some consumer-facing products should be treated differently.

*(f) (1) "Covered battery-embedded product" means a product containing a battery from which the battery is not designed to be easily removed from the product by the user of the product with no more than commonly used household tools.*

*(2) "Covered battery-embedded product" does not include any of the following:*

*(A) A medical device, as defined in Section 321(h) of Title 21 of the United States Code, if either of the following applies:*

*(i) It is a Class I device as defined in Section 360c of Title 21 of the United States Code, and either of the following applies:*

*(I) It is a device described in Section 414.202 of Title 42 of the Code of Federal Regulations.*

*(II) Either of the following applies:*

*(ia) The device is predominantly used in a health care setting by a provider.*

*(ib) The device is predominantly prescribed by a health care provider.*

Thank you for considering our views. Please do not hesitate to contact me should I be able to answer any questions or provide additional information.

Kindest regards,



Nick Steingart  
Director, State Affairs