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LOS ANGELES COUNTY  
SOLID WASTE MANAGEMENT COMMITTEE/  
INTEGRATED WASTE MANAGEMENT TASK FORCE  
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June 15, 2023

The Honorable Alex Lee, Chair  
Assembly Environmental Safety  
and Toxic Materials Committee  
1020 N Street, Room 171  
Sacramento, CA 95814

Dear Assembly Member Lee:

**SUPPORT AND AMENDED – SENATE BILL 615 (ALLEN AND MIN) AS AMENDED  
ON APRIL 12, 2023 – VEHICLE TRACTION BATTERIES**

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) is pleased to **support** Senate Bill 615 (SB 615), as amended on April 12, 2023, and respectfully suggests further amendments to address the recommendations in this letter.

The proposed legislation, if enacted, would require manufacturers and distributors of electric vehicle batteries to establish a program for the collection, reuse, repurposing, and recycling of these batteries. This program would help to ensure that these batteries are properly managed and that the hazardous materials they contain are not released into the waste stream and the environment.

As you know, electric vehicles are becoming increasingly popular in California. In fact, the state has set a goal of phasing out the sale of new gasoline-powered cars by 2035. As a result, the number of electric vehicles on the road is expected to grow significantly in the coming years. This growth in the number of electric vehicles will also lead to an increase in the number of electric vehicle batteries that reach the end of their useful life. These batteries contain hazardous materials, such as lithium and cobalt, which can pollute the environment if they are not properly disposed of. The Task Force agrees that proper recycling of traction batteries at the end of their useful life is imperative to avoid them being improperly disposed in the waste stream.

The Task Force recommends amending the bill to ensure manufacturers, producers, importers, and distributors join a stewardship organization or producer responsibility organization similar to past enacted expanded producer responsibility legislation. The stewardship organization should be required to bear the full cost of the program. The Task Force recommends amendments to protect consumers, waste haulers, and facilities that must handle the batteries for recycling and disposal purposes. The amendments should ensure that these entities are fully reimbursed for all program costs that they incur in assisting the stewardship organization with recycling the battery. Finally, the stewardship organization should be required to do a full life cycle analysis of the cost of recovering materials from discarded batteries as opposed to the costs and resources need to extract raw materials to produce new batteries. This full life cycle analysis should be used to ensure that consumers who buy electric vehicles in the future do not pay undue and disproportionate costs to the manufacturer for having to recycle the electric vehicle traction batteries.

SB 615 is an important step in protecting the environment and public health by helping to ensure that California is a leader in the responsible management of electric vehicle batteries. The Task Force's recommended amendments would support a circular economy and help ensure that the program is financially sustainable.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated and cost-effective and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, waste management industry, environmental groups, the public, and a number of other governmental agencies.

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Based on the foregoing, the Task Force is pleased to **support** SB 615 and requests the bill be **amended** to include the recommendation in this letter. If you have any questions, please contact Mr. Mike Mohajer, a member of the Task Force, at [MikeMohajer@gmail.com](mailto:MikeMohajer@gmail.com) or at (909) 592-1147.

Sincerely,



Sam Shammas, Vice-Chair  
Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force

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cc: Senators Allen and Min

Each Member and staff of the Assembly Environmental Safety  
and Toxic Materials Committee

California State Association of Counties

League of California Cities – Los Angeles County Division

Each Member of the Los Angeles County Board of Supervisors

Fesia A. Davenport, Los Angeles County Chief Executive Officer

Gateway Cities Council of Governments

San Gabriel Valley Council of Governments

South Bay Cities Council of Governments

Westside Cities Council of Governments

Each City Mayor and Manager in the County of Los Angeles

Each City Recycling Coordinator in the County of Los Angeles

Each Member of the Los Angeles County Solid Waste Management Committee/  
Integrated Waste Management Task Force