



December 8, 2025

Via Comment Portal

CalRecycle
300 Capitol Mall, Suite 1250
Sacramento, California 95814

Via Email to staff@oal.ca.gov

OAL Reference Attorney
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Sacramento, California 95814

Re: Support for Exempting Motor Vehicles from the Covered Battery-Embedded Waste Recycling Emergency Regulations

The Alliance for Automotive Innovation (Auto Innovators) appreciates the opportunity to submit these comments on CalRecycle's Notice of Covered Battery-Embedded Waste Recycling Emergency Regulations published on December 1, 2025.

Auto Innovators represents the full auto industry value chain, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country's GDP, responsible for supporting nearly 11 million jobs, and driving \$1.5 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector¹.

Auto Innovators strongly supports CalRecycle's clarification that motor vehicles are not included in the definition of "covered battery-embedded product"². Senate Bill 1215's (Newman, 2022) intended focus was always on recycling just consumer-facing covered electronics.

Auto Innovators greatly appreciates CalRecycle's collaboration. Clarifying these regulations to exempt motor vehicles eliminates duplicative costs and programs and allows the industry to continue evaluating a more appropriate policy framework for EV batteries.

Sincerely,

Cory Bullis
Director, Energy and Environment Policy
Alliance for Automotive Innovation

¹ Alliance for Automotive Innovation. (n.d.). *Resources and insights*. <https://www.autosinnovate.org/resources/insights>

² Department of Resources Recycling and Recovery. SB 1215 Covered Battery-Embedded Products Emergency Regulations: Proposed Regulation Text. Page 4. <https://calrecycle.ca.gov/laws/rulemaking/cbep/>.