

February 27, 2025

RE: HF1040 (Scott)

Chair Swedzinski, and members of the House Energy Finance and Policy Committee:

Conservation Minnesota writes to you today to share our thoughts on HF1040 (Scott), and the establishment of an Extended Producer Responsibility Program (EPR) for solar and wind energy technology.

EPR proposals exist for many types of products, including paint, tires, carpets, electronics, and even solar panels and wind turbine blades, as you are considering today. We believe generally that EPR policies are an important tool to encourage innovation of cleaner, more sustainable products, and to hold companies accountable for the entire lifespan of their goods.

Last year, we participated in MPCA's working group on solar panel reuse and recycling. The working group discussed several policy options, ultimately finding consensus around two proposals: a landfill ban on landfilling used panels, and decreasing the megawatt threshold for requiring decommissioning plans. While an EPR system like the one proposed in HF1040 (Scott) was considered, there were concerns from many stakeholders about the impact this would have on solar development, and in turn, on meeting Minnesota's clean energy goals.

While we strongly believe industry should be accountable for their products, the current lack of reuse and recycling infrastructure for solar panels in Minnesota makes full-scale EPR difficult to implement. However, we believe that a landfill ban like the one described in Section 4 of HF1040 (Scott) is a step that can be taken now to make a positive impact. Doing so would help us develop a cleaner, more circular solar economy, one where our solar energy system can grow responsibly with increased end-of-life options.

At this time, we support the recommendations of the MPCA working group, and believe a landfill ban for solar panels is something this legislature can do immediately to move Minnesota in the right direction. We look forward to working with members and other stakeholders on this in the coming months.

Sincerely,
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