PV Module Stewardship and Takeback Program Update 01-10-2019
Current Status

• The statewide collection program is not currently operational.

• No sites (that I’ve heard of) in WA recycling PV modules.

• Recycling locations in:
  • Idaho
  • Ohio
  • Wisconsin

• Program collection begins January 2021.

• Creating guidance plan for manufacturers.
What Does the Law Say?

• SB 5939 passed in 2017
  • Primarily a tax incentive bill.

• Created [Chapter 70.355 RCW](#), Photovoltaic Module Stewardship and Takeback Program
  • PV module manufacturers responsible for financing the takeback and recycling system.
Ecology’s Role

- Create guidance document that manufacturers will follow when:
  - Creating stewardship (recycling) plan.
  - Preparing annual report.
  - Listing downstream vendors.
  - Creating collection network.
Examples Covered in Program
Examples NOT Covered in Program
Tracking Manufacturers Participation

- Manufacturers must submit their own plan or join another stewardship organization.

- When participating in another stewardship organizations plan, it is that stewardship organizations responsibility to submit a list of the manufacturers and brand names that the stewardship organization represents. They must do this within sixty days of its designation by a manufacturer as its agent, or within sixty days of removal of such designation. [RCW 70.355.010 (4)]
Enforcement - Process

RCW 70.355 outlines the enforcement provision of the bill. Enforcement can take place with manufacturers beginning January 1, 2021 when the manufacturer does not provide a stewardship plan to Ecology or if the manufacturer selling into WA is not part of a stewardship plan.

Process:
• Ecology sends a warning letter to the manufacturer(s) not participating in the plan
• Manufacturer(s) must participate in a plan or submit a plan within 30 days of the warning letter
Enforcement - Penalties

- Ecology can assess a penalty of up to 10K for each sale of a photovoltaic module in or into the state that occurs after the initial written warning.

- A manufacturer may appeal a penalty issued to the Thurston Co. superior court within 180 days of the penalty notice.
Timeline

- **Mid Feb. 2019**: Ecology sends draft guidelines to Advisory Committee for final round of comments
- **April/May 2019**: Ecology sends administrative fee invoices to manufacturers
- **July 2019**: Final guidance document published
- **January 2020**: Initial plans submitted to Ecology
- **January 2021**: Plans are implemented and collection operational
- **January 2021**: Only manufacturers participating in a plan can sell in or into Washington

## Stakeholder Advisory Group

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization and Position</th>
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<tbody>
<tr>
<td>Bill Angel</td>
<td>Whatcom County Health</td>
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<tr>
<td>Evan Bush</td>
<td>Itek Energy</td>
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<tr>
<td>David Thompson</td>
<td>Panasonic Corporation of North America</td>
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<td>Kirk Haffner</td>
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<td>Dean Van Vleet</td>
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<td>Matthew Garamone</td>
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<td>Evelyn Butler</td>
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<td>Rick Matheson</td>
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<td>Garvin Heath</td>
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<td>Heather Trim</td>
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Thank You

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