Result from the meetings Manufacturer Guidance Document.

• Manufacturers create a stewardship plan
• Plans due by January 2020, implementation by January 2021.
• Otherwise, Manufacturers cannot sell in WA after January 2021.
• Two PV module recyclers expressed interest in receiving product.
• Audit of product sold in 2018 was conducted based on information reported to the incentive program. (Closed)

Challenges:
• State: How to regulate market? Installers? Distributers? Web?...
• Manufacturers: Collection service requirement.

But at the very first meeting we reviewed:

Interpretation of the type of products included in the definition of “photovoltaic module” under RCW 70.355.010 from the WA Attorney General’s office

The stewardship program covers:
- PV modules used for residential, commercial, or agricultural purposes that are installed on, connected to, or integral with buildings.
- Freestanding off-grid power generation systems such as water pumping stations, electric vehicle charging stations, solar fencing, solar-powered signs and solar-powered street lights.

Not Covered:
- large scale ground mount, commercial or utility scale projects, that interconnect with a utility service, but are not associated with a specific building.

Discussions indicate this was an oversight.
For these system to be included, a change to the law is required.