

**WASHINGTON REFUSE & RECYCLING ASSOCIATION**

January 31, 2025

RE: Battery Legislation Comments

The Washington Refuse and Recycling Association (WRRA) appreciates the opportunity to provide comments on the proposed legislation concerning the Battery Stewardship program in Washington. Our members play a critical role in the state’s waste management and recycling systems, and we are committed to supporting policies that protect public safety, encourage proper recycling, and minimize environmental impacts.

Lithium-Ion batteries in the waste stream create a substantial fire risk at recycling facilities and even in waste collection vehicles. These batteries should never be placed in the curbside bin and present risks to our industry’s greatest resource: our workers and their safety. WRRA supports stewardship programs that do not disrupt the existing curbside collection system and for materials that present challenges to public health and safety in the waste stream. WRRA recommends strong transparency and oversight provisions for all stewardship organizations. We appreciate your consideration of these issues important to the solid waste industry and suggest brief clarifying language stated below:

**General battery disposal and collection requirements - Section (6):** This section states that solid waste collection companies are not subject to violations if generators improperly dispose of batteries in waste containers. We suggest a short clarification that the solid waste company is not in violation if the generator places a battery in a waste *or* recycling container to reflect the intent of the legislator to protect solid waste collectors from liability due to the actions of the generator that the company cannot control.

(6) A solid waste collector may not be found in violation of this section for a covered battery placed in a disposal or recycling container by the generator of the covered battery.

**New Section/Language - Application of this chapter:** WRRA suggests the language below to clarify that the broader solid waste and recycling collection regulatory structure is not impacted by this legislation. This language should not change the effect of the disposal ban in section 15. This language is taken from Washington's e- waste program statute, RCW 70.95N.030(4)):

Nothing in this chapter changes or limits the authority of the Washington utilities and transportation commission to regulate collection of solid waste in the state of Washington, including curbside collection of residential recyclable materials, nor does this chapter change or limit the authority of a city or town to provide such service itself or by contract pursuant to RCW 81.77.020.

Thank you again for the opportunity to comment on this important and meaningful legislation.

Please contact India Brine at india@wrra.org or (360)742-2609 with any questions.

Best Regards,

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