



January 31, 2025

Submitted via electronic submission on the [Department of Ecology website](#)

Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Subject: Public Comment on Chapter 173-905 WAC - Battery Stewardship Program Rulemaking

To Whom it May Concern:

We appreciate the opportunity to provide comments on the Department of Ecology's proposed rulemaking for Chapter 173-905 WAC - Battery Stewardship Program. Ridwell fully supports Extended Producer Responsibility (EPR) and stewardship programs as effective frameworks for diverting hard-to-recycle materials from landfills and ensuring transparency in recycling.

Our comments focus on discussions from the December 16, 2024, Battery Stewardship Rulemaking meeting regarding disposal using recycling services operating outside of a battery stewardship program.

As an alternative waste diversion service that enables households to easily get reusable and recyclable items not included in curbside recycling to nonprofits and specialty recyclers, Ridwell has helped our customers responsibly recycle nearly 1 million pounds of household batteries. Operating as a permitted Common Carrier with the Washington Utilities and Transportation Commission (UTC), Ridwell's service extends the reach of drop-off recycling opportunities by transporting designated reusable and recyclable materials for households unable or unwilling to utilize drop-off sites. Our voluntary, supplemental alternative waste diversion service aligns with the new battery stewardship program and supports the success of the Battery Stewardship Organization (BSO) by extending the reach of the BSO's drop-off-focused efforts to households that might otherwise not participate.

Ridwell currently works directly with accredited specialty recycling companies like Call2Recycle, safely delivering our customers' batteries for recycling, and looks forward to working directly with the BSO to support the success of this program by providing Washington residents the opportunity to efficiently and safely get their household batteries into the BSO program without having to leave home. We are prepared to comply with all applicable safety and reporting requirements, and share the belief that anyone involved in the recycling of batteries in the state should be doing so in a safe and environmentally responsible manner.

For these reasons, we support the development of rules clarifying that any collection activity outside the formal BSO program be appropriately reported and that any applicable documentation and handling standards must be followed. Accurate reporting is vital for

transparency, accountability, and maintaining consistency in data collection across all recycling services, whether operating within or outside of the BSO plan.

In conclusion, we commend the Department's commitment to advancing battery stewardship in Washington State. Clear reporting protocols and innovative collection methods will expand access to recycling while ensuring accountability and responsible material management. We look forward to continued collaboration to achieve the program's goals and promote sustainable solutions.

Thank you again for the opportunity to provide comments.

Sincerely,

A handwritten signature in black ink that reads "Caleb Weaver". The signature is written in a cursive style with a long horizontal flourish at the end.

Caleb Weaver
Vice President of Public Affairs
Ridwell