

Redwood Materials

July 15, 2024

Department of Ecology
PO Box 47600
Olympia, WA 98504

Re: Battery Stewardship Program Rulemaking
To Whom It May Concern:

At Redwood Materials, we are pioneering the first U.S. based closed-loop supply chain for lithium-ion batteries, which involves the collection, recycling, and re-manufacturing of batteries into critical components like anode and cathode materials. Our efforts are designed to support the nation's transition to sustainable energy and accelerate the adoption of electric vehicles (EVs), achieving recycling rates above 95% and substantially reducing environmental and carbon footprints.

Thank you for the opportunity to comment during the rulemaking process for the Battery Stewardship Program. We appreciate the opportunity to be a part of the Rule Advisory Committee.

Reporting covered battery was discussed during the June 24 webinar, which has demonstrated the need for clarification on several points.

- One point was how to separate covered batteries from battery containing devices that may fall under another program (laptops, cell phones, and tablets) or were from a medical device. Devices can be separated from batteries, but loose batteries should only be sorted by chemistry and reported. There is no way to determine covered batteries based on the device they were sold with.
- Batteries returned to the producer via customer service and warranty programs are pre-existing programs that fall outside of the battery stewardship organization's collection efforts. Companies have existing partnerships to manage and recycle those batteries that should continue.

The calculated recycling efficiency rate was also a point of discussion. This calculation is dependent on data from the recycling facility. As a battery recycler, we can report the weight of batteries sent to us from aggregators, collection sites or partners, but since we are aiming for certain ratios of metals in our recycling process, we then blend those batteries with materials from other sources. As such, it is hard to be specific in the recycling efficiency rate for Washington-sourced batteries. A facility's recycling efficiency rate, as determined by a third party, can meet the objectives of the law more easily than reporting inputs and outputs for the Washington Battery Stewardship Program.

The reporting process includes several narrative sections related to performance goals. Specifically for definitions and reporting, the narrative description of coordinating with other collection programs can include the data of collection sites and batteries collected at those sites. In this way, battery stewardship organizations are motivated to work with other collection programs (to meet their performance and efficiency goals) and consolidate that data into a comprehensive report for the state.

Regards,



Don Tatro
Director, State and Local Policy
Don.tatro@redwoodmaterials.com