



October 2, 2024

To: Washington State Department of Ecology

From: Nicholas L. Cain, SOLARCYCLE

RE: Comments on Ecology's Proposal to Delay Implementation of Solar Panel Stewardship Law

Department of Ecology:

We are writing in support of your proposal to delay implementation of Washington's solar panel stewardship law (Chapter 70A.510 RCW) and to convene an advisory committee to suggest further changes to the law. SOLARCYCLE is an advanced recycler of solar photovoltaic (PV) panels dedicated to creating a more circular economy. Founded in 2022, we recycle retired panels, recover valuable materials, and make key components for the next generation of solar panels and clean energy products.

Although we are recyclers who want to promote responsible management of solar panels that have reached their end-of-life (EOL), we are in support of this proposal because:

- The current law is not flexible enough to allow the program to adapt to new technologies or new approaches to recycling.
- There are alternative policy approaches — such as requiring system owners to create a recycling plan — that are more feasible, effective, and efficient.
- The volume of EOL PV panels is growing slowly, while the threat of climate change is growing rapidly. Drawing on research from the International Renewable Energy Agency ([Weckend, et al. 2016](#)) we expect EOL PV modules to make up only about 0.25% of the total U.S. municipal solid waste stream in 2030.
- This proposal provides Washington State with more time learn from other programs in other locations.

Retired PV modules, if they are recycled properly, have the potential to provide sustainable supplies of key materials for the domestic supply chain. We share your goal of promoting responsible management of EOL PV and look forward to working with Washington State and other stakeholders to develop a system that keeps costs low while promoting responsible recycling.

Thank you,

Nicholas Cain, Director of Government Affairs