

October 2, 2024

Ms. Julie Robertson
Legislative Coordinator
Solid Waste Management Program
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Legislative Proposal to Delay and Improve Washington's Photovoltaic Module Stewardship and Takeback Program

Dear Ms. Robertson:

I am writing on behalf of Panasonic Corporation of North America (PNA). Thank you for the opportunity to provide comments on [Washington Ecology's legislative proposal](#) to amend [Washington's Photovoltaic \(PV\) Module Stewardship and Takeback Program law](#).

First, we would like to express our full support for the overall intent of Washington Ecology's goal of PV module end-of-life management. As you may know, Panasonic has a long history of sustainability that started over 100 years ago, with our founder's guiding vision of making today better than yesterday, tomorrow better than today. PNA has taken a leadership role in establishing and operating a recycling system for consumer electronics and batteries. Proper management of end-of-life PV modules aligns with the [Panasonic Green IMPACT](#), our parent company's environmental strategy to combat the impact of global climate change.

We are in full support of the legislative proposal, which seeks to improve and delay implementation of the PV module stewardship law. The solar industry and context of the law has changed dramatically since the law was enacted and the proposed changes to the law provide an opportunity to understand the implications of these changes as well as identify and recommend a more viable and effective path forward.

These changes to the industry include a significant growth in the global PV manufacturing capacity (doubling supply compared to demand) that increased the availability of PV modules following the supply chain challenges of the pandemic. This resulted in overcapacity and severe price decreases in PV modules by an estimated 50 percent in 2023.ⁱ Since the enactment of Washington's Photovoltaic Module Stewardship and Takeback Program law, manufacturers that have installed panels in Washington have gone out of business. We have concerns about the impacts of this situation on the implementation of the law:

- Manufacturers who are no longer in business are not currently required to participate in stewardship plans and allocate funds towards PV module collection and recycling costs in the state.

- Effective solutions to address the overcapacities and resulting significant price drops are still being explored by PV module manufacturers. As a result, incorporating recycling costs into PV module pricing, especially for panels sold from 2017 to the present will prove difficult as PV modules are currently being sold at or below cost.

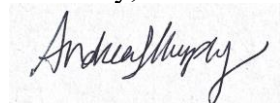
Second, we would like to offer the following recommendations to improve the legislative proposal:

- In Section 2.(1)(h), replace "A photovoltaic module manufacturer" with "A photovoltaic module trade association" to provide representation from the industry more broadly.
- Add a provision to allow public comment on the report required in Section 2.(2)(d) or in Section 2.(4).

As founding members of Call2Recycle and MRM E-Cycling Management, Panasonic has demonstrated leadership and commitment in the recycling of electronic and battery related products. This commitment includes Panasonic serving on the Washington state PV Module Stewardship Stakeholder Advisory Group. As a leader in this area, we would like to express our appreciation for the work of Washington Ecology in seeking to both improve the law and advance and maintain a robust solar industry in Washington state while making the equitable transition to clean energy and protecting the environment.

Thank you for your consideration. If you have any questions or require further information, please do not hesitate to contact me.

Sincerely,



Andrea Murphy, MESM
Director, Environmental Affairs Compliance & Sustainability
Panasonic Corporation of North America
Two Riverfront Plaza, 11th Floor
Newark, NJ 07102-5490
Office: 201-392-6010
andrea.murphy@us.panasonic.com

ⁱ Solar Power Europe, Global Market Outlook for Solar Power 2024-2028, June 2024, accessed on October 1, 2024 at [Global Market Outlook For Solar Power 2024 - 2028 - SolarPower Europe](#)