

King County Solid Waste Division

We understand that a majority of solar panel manufacturers have not submitted a stewardship plan before the July 1, 2024 deadline, and thereby they will be out of compliance and not allowed to sell solar panels in Washington beginning July 1, 2025.

This threatens the availability of solar panels in the state, which could severely undermine Washington's transition to clean energy.

While we understand the request to delay the effective dates in the law, we are concerned that this program is going to be delayed even further. The program was initially slated to be operational in 2021. The effective dates have already been extended twice in 2020 (to 2023) and 2021 (to 2025). If the Department of Ecology's request passes, the solar panel takeback and recycling will not be implemented before 2029.

The expected life span of a solar panel is 20 to 30 years. While we currently do not see large amounts of used solar panels at our facilities, we anticipate a significant increase in solar panel waste in the next few years as the panels installed in the 2000s are decommissioned.

We welcome the establishment of an advisory committee, but we strongly urge the Department of Ecology to develop a concrete action plan to ensure that solar panel manufacturers actively participate in the program and fund the collection and recycling of their own panels. The plan should go beyond relying solely on legislative extensions and include additional strategies to ensure compliance. These could include publicly disclosing the manufacturers that are in compliance (or not) and increasing outreach and education efforts.

In particular, manufacturers that have already sold solar panels in or into the state after July 1, 2017, should be held accountable and pay their fair share of the end-of-life costs regardless of whether they continue to sell solar panels in Washington.

Local governments and residents should not be burdened with the costs associated with the end-of-life management of solar panels – those costs should be covered by the producers and consumers that benefit from the sale and use of solar panels.