

Geri Toeroek

Dear Department of Ecology,

My name is Geri, and I am a new resident of Port Angeles, recently relocated after spending over 15 years living in Switzerland. I'm writing to offer my feedback on the proposed Battery Stewardship Rule (WAC 173-905).

First, I want to **commend the Department** for taking meaningful steps toward creating a consistent, safe, and environmentally responsible battery recycling system for Washington. The focus on producer responsibility, collection infrastructure, and safe handling is both timely and necessary, especially as battery use continues to expand across all sectors.

I particularly appreciate:

- The commitment to making battery drop-off **free and convenient**.
- The integration of **environmentally sound management practices** and recycling hierarchy.
- The inclusion of **overburdened and geographically isolated communities** in access planning.
- The **clear framework for oversight**, reporting, and compliance.

However, having experienced firsthand how battery recycling is implemented in Switzerland, I believe **one major element is missing** from Washington's approach: **direct consumer engagement**.

In Switzerland:

- It is **illegal to dispose of batteries in household waste**.
- Every retailer that sells batteries **must accept them back**, no questions asked.
- Consumers are **expected by law to return batteries**, and the social norm is deeply ingrained.
- Batteries are collected not just at specialized sites, but at nearly every supermarket, pharmacy, electronics store, school, and post office — with **over 12,000 locations** nationwide.
- **Public awareness** is high due to strong, visible campaigns and education from a young age.

The result? Battery recycling rates regularly exceed **70%** — among the highest in the world.

In contrast, Washington's program — while robust in design — appears to **rely entirely on voluntary consumer behavior**. There is no:

- **Incentive** or nudge for consumers to participate,
- **Mandate** for retailers to accept batteries,
- Or **penalty** for improper disposal.

Without these, the burden is placed solely on producers and drop-off sites — and **the public may not change their habits**, despite the infrastructure being in place. This is especially concerning given the rule's own acknowledgment that improper disposal is already causing fires and environmental harm.

I respectfully suggest the Department consider **future phases or amendments** that include:

- A legal obligation for consumers to return batteries.
- A **mandatory take-back requirement** for retailers.
- Stronger and ongoing **public education campaigns**.
- Consideration of **consumer incentives**, such as point-based rewards, small refunds, or store credit.
- An evaluation framework for **public participation rates**, not just collection site coverage.

In Switzerland, the consumer is not treated as an afterthought, but as an active, obligated, and equal participant in the recycling system — including batteries. What truly drives its success is a deeply ingrained mindset: recycling is not about convenience, but about responsibility. This cultural expectation — supported by clear rules and social norms — ensures that doing the right thing is second nature.

As someone who has benefited from a system where battery recycling is second nature, I'd be happy to share more about Switzerland's recycling culture — and how Washington can adapt those lessons within its own legal and cultural context.

Thank you for your work and for the opportunity to provide input.