

Sustainable Tri-Cities (Jenni Heerink)

We appreciate the opportunity to provide feedback; see attached the full comment in a 3 page pdf.
Thanks so much for your time to review.

Sustainable Tri-Cities



SustainableTri-Cities

Alliance for a Livable and Sustainable Community

September 9, 2025

Public Comment Battery Stewardship Program Rulemaking- Chapter 173-905 WAC

(3 Pages, Including Appendix)

We at Sustainable Tri-Cities are passionate advocates for a thriving circular economy. As a nonprofit dedicated to our community's well-being, we work to educate and inspire Tri-Citians to recycle smarter and make choices that protect our health, our environment, and our future.

We overall welcome a state level stewardship program, however we have some concerns.

Summarized, our observations are that the new battery rule creates unnecessary complexity, risks disrupting existing recycling markets, and lacks clear incentives to drive proper disposal.

Below it is explained more in detail:

Lack of Reward

- Under a producer responsibility model, the costs are placed on manufacturers, but in reality, those costs are passed down to consumers through higher prices — often without them realizing it. At the same time, without strong incentives, many people won't take the extra step to drop off their used batteries. Enforcing proper disposal would require tracking municipal waste bins for illegally tossed batteries, which would be extremely costly and difficult to manage. Without effective enforcement, there's little motivation for consumers to participate, making the program both expensive and ineffective.
- The rule focuses heavily on collecting fees but fails to create a strong "pull" to ensure more batteries are actually collected and properly managed. There's no requirement for collectors to meet performance targets — like processing a certain number of tons — in order to receive X funding. As a result, costs for labor, processing, and outreach will be paid out regardless of outcomes, leaving little accountability or incentive to improve collection rates.

Inefficient by Design

- With the **E-Cycle** program already in place, it doesn't make sense for this battery rule to stand on its own. Many batteries are still inside devices when they're discarded, and since electronics are already being collected, batteries are a natural extension. Leveraging the existing E-Cycle infrastructure and communication channels would be far more efficient — simply expanding the program to include batteries instead of creating a separate, duplicative system. (see image A for current E-cycle drop off locations in Tri-Cities)

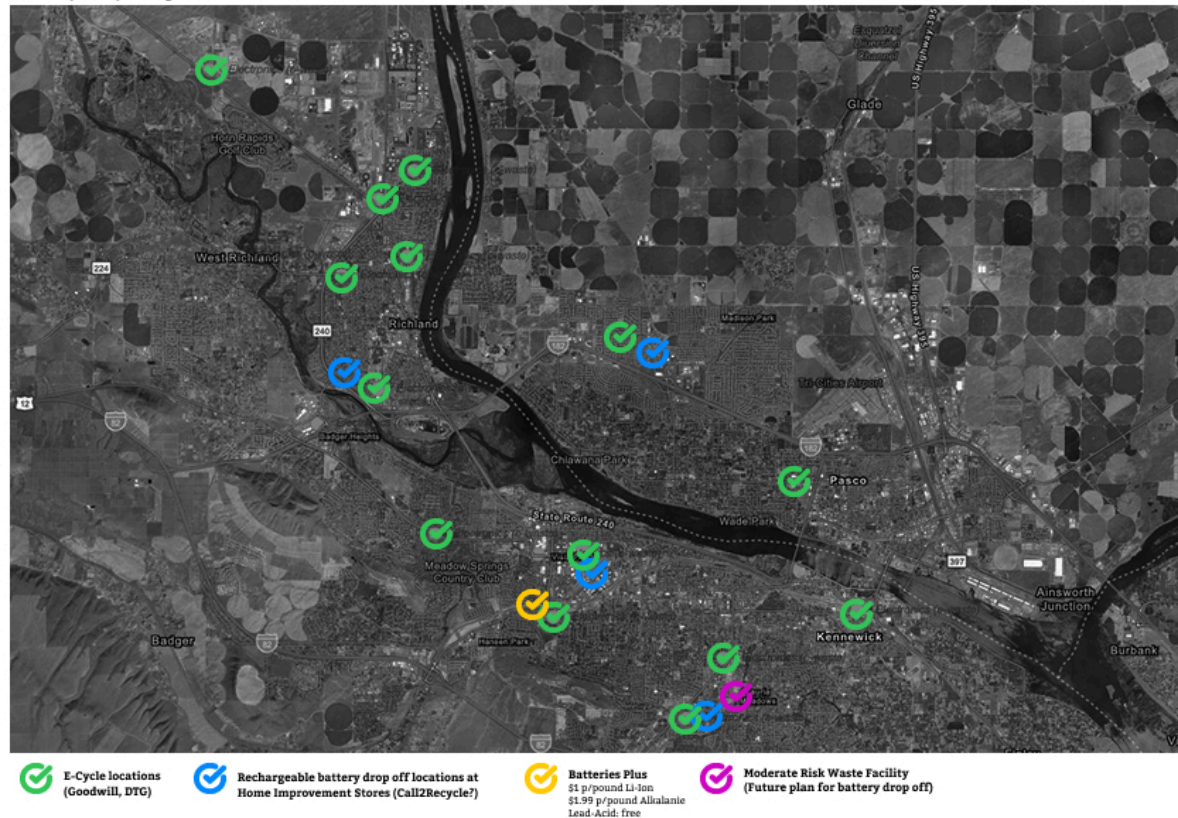
- By introducing the categories like “small” or “portable” and “medium” batteries, the rule reinvents the wheel and doesn’t reflect how batteries are currently managed or valued. Sorting is already a major bottleneck in the recycling industry in general, impacting efficiency, safety, and overall costs. Sticking with the battery types consumers already recognize by chemicals — like Alkaline, Lithium-Ion, Lithium, and NiMH — helps maintain clarity, improves collection accuracy, and preserves value throughout the recycling process.
- There are already established recycling processes for certain battery types, like Lithium-Ion, which are currently profitable on their own or supported by the Department of Energy. By lumping all batteries together under one program, the rule risks due to increased sorting costs, undermining these existing markets, and making recycling less efficient and more expensive than it needs to be. (see image B, C for quantity/value by type)

Consistent Communication Required

- Without clear communication guidelines, this rule risks confusing consumers and reducing participation. For years, government agencies have told people to throw **alkaline batteries** in the trash, while **lithium-ion** batteries are collected in clearly labeled bins at retailers. If each Battery Stewardship Organization (BSO) creates its own messaging, it will lead to fragmented, inconsistent information — leaving consumers unsure where to take it and less likely to dispose of batteries correctly. (See image D for suggested E-Cycle branding).
- Many consumers are skeptical about recycling because of past scandals — like images of mountains of plastic shipped overseas or recyclables ending up in landfills. To rebuild trust, we support a **U.S.-based processing requirement** with mandatory transparent communication about where and how the by chemistry labeled batteries are recycled, and what new materials are created in the process. When people can see the real impact of their efforts, it creates an emotional reward and a strong incentive to drop off batteries properly. Competing industry partners with opaque, multi stream recycling (see Image E) should not hamper **the right for consumers to know** what happens after their recycling drop off efforts. As being a ‘certified drop off station’ recognized by consistent branding and supported by a value chain story, it can regain consumers' trust.
- A municipality like Pasco does not have any curb-side recycling program for its residents. It could become a tall order for its residents to go out of the way to drop off batteries to get recycled. With no incentive, no feasible enforcement, communication needs to be convincing, consistent and ubiquitous in order to change behavior.

Appendix: Battery Recycling Public Comment (Sustainable Tri-Cities)

Image A: An overview of existing recycling infrastructure in Tri-Cities WA plus future suggested drop off points for battery recycling.



Images B+C: Yearly stream estimates for Benton/Franklin Counties*

Visual representation of quantity versus value of each battery type/chemical composition
(in units) (in value p/ton)



* These numbers are generated by ChatGPT and most likely far from perfect. They are just for illustration only.

Image D: Suggested brand extension of E-cycle WA
Optimal recognition and efficient use of infrastructure



Image E: Multiple stream Retailer recycling
Opaque collection of non-related streams. (CFL = moderate risk waste, Plastic is recycled..???)

