



August 8, 2025

Julie Robertson  
Senior Policy Planner, Solid Waste Management Program  
WA State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

**RE: Update to RCW 82.19.020 – Litter Tax**

Dear Ms. Robertson:

Please accept the following feedback from the Alliance for Automotive Innovation (AFAI) regarding the proposed statutory changes to RCW 82.19.020, which seeks to add new product categories to the state's litter tax imposition.

AFAI is the leading advocacy group for the auto industry. We represent the manufacturers producing most of the vehicles sold in the U.S., as well as zero emission vehicle technology providers, EV battery producers, autonomous vehicle innovators, semiconductor makers, and equipment suppliers.

As proposed, changes to RCW 82.19.020 would include "motor vehicle products" to the imposition of the existing tax on litter in Washington state. However, as conveyed to you through our legislative representative during your July 23<sup>rd</sup> general information session, the proposed terminology "motor vehicle products" is overly broad. Based on the draft-language Ecology provided it is unclear the meaning of the tax and how it will be imposed. For instance, would the tax on "motor vehicle products" apply to:

- Original equipment and components of a motor vehicle?
- Parts under warranty or replaced by an original equipment manufacturer?
- Parts covered by product stewardship or producer responsibility requirements?
- Aftermarket parts and components?

During the general information session Ecology cited motor vehicle products as part of the litter survey. It would be helpful to better understand what motor vehicle products are being collected and why they're being disposed of along the state's highways and open spaces.

Before pursuing legislation to add motor vehicles products to the state's litter tax, we encourage the Ecology to work with industry representatives to answer the questions we have raised over the application of the tax and to review the data of the litter survey.

If you have any questions or comments regarding the Alliance for Automotive Innovation's position, please contact me at [caugustine@autosinnovate.org](mailto:caugustine@autosinnovate.org) or Brandon Houskeeper, the Auto Innovators' legislative representative, at (360) 556-3724 or [brandon@houskeeperpublicaffairs.com](mailto:brandon@houskeeperpublicaffairs.com).

Thank you for your thoughtful consideration.

Sincerely,

A handwritten signature in blue ink that reads "Curt Augustine". The signature is fluid and cursive, with the first name "Curt" and last name "Augustine" clearly legible.

Curt Augustine  
Senior Director, State Affairs  
Alliance for Automotive Innovation