



August 21, 2026

Re: Proposed Washington State Battery Stewardship Program Plan

Department of Ecology,

Thank you for the opportunity to comment on The Battery Network's proposed Battery Stewardship Program Plan (Plan). Seattle Public Utilities (SPU) currently collects portable batteries for all King County residents at our two Moderate Risk Waste collection facilities as a managing partner of the Hazardous Waste Management Program in King County. We also collect portable batteries at our two solid waste transfer stations, and through curbside pickup for Seattle customers. We plan to continue these activities under the new Battery Stewardship Program and want to ensure this Plan achieves the following outcomes:

- Decreases risk and impact of fires to our customers, vendors, facilities, and workers.
- Reimburses local governments for the true and statutorily required costs of battery collection and management.
- Maximizes battery management using the defined battery management hierarchy.
- Decreases environmental and health impacts that can result from improper battery storage, collection, and disposal.

While we are supportive of The Battery Network's efforts to implement Washington's Battery Stewardship Program, we do have concerns about this Plan's completeness and its compliance with RCW 70A.555 and WAC 173-905 to achieve the outcomes identified above.

We urge the Department to disapprove this Plan.

Attached are:

- A matrix that outlines sections of the Plan, the relevant RCW and WAC citations, and our detailed comments.
- The Hazardous Waste Management Program's comment letter to The Battery Network in response to the GreenVantage Agreement, outlining in further detail the deficiencies with the agreement, which is now part of the Plan.

Thank you again for the opportunity to comment, and please reach out to Pam Johnson, Hazardous Waste Liaison & Policy Advisor, pam.johnson@seattle.gov, with any questions or concerns about our comments.

Sincerely,

Susan Fife-Ferris

Susan Fife-Ferris (08/21/2026 15:49:13 PDT)

Susan Fife-Ferris

Director, Solid Waste Planning & Program Management Division

Solid Waste Line of Business

Seattle Public Utilities