

Sustainable Tri-Cities (Jenni Heerink)

Sustainable Tri-Cities Feedback on the Battery Network Stewardship Plan

Sustainable Tri-Cities is a nonprofit that works to educate and inspire our community to recycle smarter and make choices that protect our health, environment, and future.

We welcome a statewide battery stewardship program. We are especially pleased that the proposed plan builds on an existing collection network and aims to provide comprehensive battery recycling across Washington.

We do, however, have concerns about accountability and public outreach.

ACCOUNTABILITY

A reliable collection rate requires both a reliable numerator (batteries collected) and denominator (batteries sold). The plan provides more detail on tracking collection than on independently verifying the sales data used to measure performance.

The plan describes GreenTrax as the system used to manage and track collection and downstream shipments, but it does not clearly explain how weights collected at individual sites are measured, entered, verified, and reconciled with weights received by sorting facilities.

There is no clearly described reconciliation between Washington sales data and batteries actually collected.

The proposed collection target is based on estimated national sales allocated to Washington by population, rather than actual Washington sales data.

The plan does not clearly explain how covered batteries entering commercial scrap and material-recovery channels outside the Battery Network system will be accounted for.

It does not clearly explain how Washington e-commerce sales will be identified and included in the sales estimate.

Because batteries are collected as mixed streams, it is unclear how individual producer responsibility will be determined or how major manufacturers will be held accountable for their share.

When Washington-collected batteries are sent to out-of-state sorting facilities, the plan should explain how Washington material will remain identifiable and how weights will be reconciled with the amount collected in Washington.

Overall, much of the program's accountability appears to rely on self-reported data. The plan should provide more detail on independent verification and reconciliation.

Recommendations

A credible EPR program needs to:

Know what batteries enter Washington.

Know what batteries are collected in Washington.

Be able to reconcile the two.

We recommend:

Develop a Washington-specific sales baseline during the first program year and use actual Washington data to set future collection targets.

Explore upstream wholesale data to better identify the batteries entering Washington; APIs that automatically include brand, size, type, and chemistry.

Establish geographically distributed Washington aggregation and verification points where collection data and physical weights can be reconciled before material leaves the state.

Regional/County HHW facilities could be a good candidate.

PUBLIC OUTREACH

The plan includes communication activities and measures consumer awareness, but it does not clearly show how outreach will be evaluated against actual collection results or how unsuccessful approaches will be changed.

Consumer messaging also needs to be much simpler. Under Washington's rules, collection sites accept covered batteries regardless of brand, subject to specific exceptions. Consumers should not have to figure out which brands are approved.

See attached visual of cluttered POS graphics in a current Lowes Battery Network collection site.

The collection locations shown in the plan also lack a consistent visual identity. Consumers should immediately recognize an approved battery collection site, regardless of which business hosts it.

Recommendations

Create a consistent statewide identity and visual system for approved battery collection sites, supported by Department of Ecology-approved branding.

Make collection-site signage simple, prominent, and easy to recognize.

Give point-of-sale collection areas enough stopping power to attract attention and build consumer trust.

Measure outreach against actual collection results and use the results to improve the program.

The goal should be simple: make the program easy for consumers to understand and easy for Ecology to verify.

**HOUSEHOLD RECHARGEABLE
(300WH OR LESS*) BATTERIES HERE**

1. Bag
Examine
the battery pack bag
2. Tie
Arrange
3. Strap
Seal

- ### 3. Drop

DROP HERE
DEPOSIT AQUE

call 2 recycle
Creating the change for recycling

Lowe's

ACCEPTED BATTERIES:

RECHARGEABLE BATTERIES

LITHIUM BATTERIES

OLD CELL PHONES

NO ALKALINE BATTERIES.

PLEASE!

HIGH ENERGY (OVER 300WH*) BATTERIES BELOW
BATERÍAS DE ALTA ENERGÍA (MÁS DE 300 VATIOS-HORA) A CONTINUACIÓN

- Bag Embolize**
One battery per bag

- 2. Open Middle Kiosk Door**
Abra la puerta central del quiosco

- 3. Place in Box**
Coloque en la caja

One battery is a 100% improvement

One healthy pe...

★ SCAN FOR MORE DETAILS



1997