

Lautenbach Recycling (Carolyn Moulton)



Submitted to: Washington State Department of Ecology

Re: The Battery Network's Proposed Battery Product Stewardship Plan

Date: August 24, 2026

Thank you for the opportunity to comment on The Battery Network's Proposed Battery Product Stewardship Plan.

The proposed plan states that The Battery Network will reimburse local government collection sites through its GreenVantage program for "demonstrable labor and related operational costs" at a rate of \$0.20 per pound. We are concerned that the plan does not provide sufficient detail regarding how those costs will be calculated, documented, and reimbursed. While the plan states that the reimbursement rate was developed using labor rates and time studies, it does not disclose the methodology behind that analysis. We request that The Battery Network clarify how the rate was calculated and commit to periodic review to ensure reimbursement reflects actual operating costs.

The plan does not clearly address reimbursement to non-governmental battery collection sites. For example, Lautenbach Recycling operates the San Juan Island Transfer Station under contract with San Juan County and will incur labor and operational costs by collecting and managing batteries under the program. Staff time will be required for training, safety procedures, customer assistance, monitoring collection areas, handling non-program materials, and complying with program requirements. Similar arrangements exist throughout Washington, where private operators provide essential solid waste services on behalf of local governments. The plan should clearly identify how these facilities will be reimbursed to ensure those performing the actual collection work are fairly compensated.

Finally, facilities serving remote island communities face unique transportation and logistical challenges that may result in costs beyond those covered by the proposed base reimbursement rate. We request a clearly defined and consistent reimbursement process for geographically isolated communities to ensure equitable participation in the program.

Thank you for considering these comments.