

## Stephen Smith

I wish to comment on the January 2026 Report to the Legislature on EITE allowance allocation for 2035–2050 prepared by the Department of Ecology. Specifically, I would like to draw the Legislature's attention to the potential solutions presented in Section 8, "Decarbonization Pathways and EITEs in Washington."

In the report, Ecology acknowledges that the solutions presented in Table 13, "Examples of Decarbonization Opportunities for EITE Industries in Washington," are "illustrative" and that a "variety of barriers" must be overcome before implementation. Based on my 35 years of experience in glass manufacturing, specifically float glass used in windows, automobiles, and solar panels, the discussion provides a useful overview but lacks the level of technical analysis necessary to support long-term regulatory decisions affecting hard-to-abate industries.

These speculative decarbonization examples should not be heavily relied upon in support of important policy decisions. Suggestions such as improving energy efficiency and increasing the use of recycled glass are already common industry practices and offer limited future potential for additional decarbonization. Other proposed solutions, including electric melting and hydrogen or other green fuels have not yet been demonstrated at commercial scale for float glass manufacturing and currently present significant technical and economic uncertainty.

While point-source carbon capture may be technically possible, Washington State does not currently have a permitted geological sequestration site (Class VI well) for the storage of captured carbon. As a result, Ecology is effectively suggesting that hard-to-decarbonize EITE industries, such as glass manufacturing, invest more than \$100 million in carbon capture systems without a viable means of sequestration, while still being required to purchase Ecology allowances for the same captured emissions.

The products manufactured by many of Washington State's EITEs have evolved over centuries of continuous innovation and process optimization. In the case of glass, that evolution spans several thousand years. The CCA's decarbonization requirements and prescribed 2035–2050 carbon reduction schedule does not adequately account for current technological realities.

The Legislature must carefully balance decarbonization objectives with the need to maintain the competitiveness of hard-to-abate EITEs. Failing to do so will increase manufacturing costs in Washington, discourage job creation, and create additional incentives for businesses to relocate outside the state.