



January 17, 2025

Chair Shewmake, Vice Chair Slatter, Ranking Member Boehnke, and Members of the Committee:

Renewable Northwest is a regional renewable energy advocacy nonprofit, and our members are a combination of renewable energy businesses and environmental groups. Our mission is to decarbonize the region by accelerating the transition to affordable, renewable electricity.

We have signed today in support of SB 5175. The bill proposes to delay implementation of Washington's Photovoltaic (PV) Module Stewardship and Takeback Program. Currently, manufacturers of solar PV modules are required to have submitted stewardship plans to the Department of Ecology by July 1, 2024.

The current law and the existing deadline are problematic for a number of reasons. First, some manufacturers are not aware of the law. There is also ambiguity in interpreting the current law that makes it difficult to comply. In many cases, there are a number of steps in ownership of panels between manufacturer and developer, rendering it unclear who bears the responsibility of complying with the law. Additionally, the current law applies the requirement to manufacturers, but then takes a punitive approach to developers, adding further lack of clarity. Importantly, the PV recycling industry is just beginning to develop, and the nearest recycling centers for this technology are in the desert southwest.

Unfortunately, this well-intended sustainability law is rendering harmful consequences to our clean energy goals. Rather than complying, some manufacturers have chosen to not sell solar panels in Washington. If the law is unchanged, we will face disruptions in the supply and cost of panels available for sale in our state, causing delays to our clean energy transition. SB 5175 would delay the effective dates of the law and allow for the creation of a facilitated advisory committee to identify recommendations for fixes. This will enable the industry to legally continue operating in the state while solutions are developed. It

may also be worth exploring if the proposed advisory board could identify a cost-effective solution for PV recycling.

Recycling and responsible decommissioning are important and needed components of full life cycle sustainability of renewable energy projects. However, it's important that we get the PV Module Stewardship and Takeback Program right so that we support the responsible growth of the solar industry and accelerate our transition to 100% renewable electricity.

We appreciate the collaboration with the Departments of Ecology and Commerce on this legislation. Renewable Northwest is happy to answer any questions from the Committee, and we thank the Members for their consideration of our views.

Sincerely,

Casey MacLean
Washington Policy Manager
Renewable Northwest