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March 11, 2021

Representative David A. Bennett, Chair
Representative Robert D. Phillips, First Vice-Chair
Representative William W. O'Brien, Second Vice Chair
House Environment and Natural Resources Committee
82 Smith St
Providence, RI 02903

RE: Support for H 5525, the Photovoltaic Takeback Act Of 2021.

Dear Chair Bennett, First Vice-Chair Phillips, Second Vice-Chair O'Brien, and Members of the Committee:

Thank you for the opportunity to submit testimony in **support** of H 5525, which would establish a sustainably financed, statewide extended producer responsibility (EPR) program in Rhode Island to recycle solar panels. The Rhode Island Legislature and the Rhode Island Department of Environmental Management (DEM) already have significant experience passing and implementing programs for leftover paint, scrap electronics, mattresses, fluorescent lighting, auto switches, and mercury thermostats, all of which are based on the same principle of EPR on which H 5525 is based.

Solar panels, also known as photovoltaic modules, contain valuable materials such as glass and aluminum, which can be made into new products. Although recycling solar panels will reduce greenhouse gas emissions and other environmental impacts, most outdated solar panels in Rhode Island are currently disposed.

H 5525 will create an EPR program for solar panels throughout Rhode Island. The bill contains many of the same standard elements of successful EPR programs in the state and around the country. These components include an industry-funded stewardship organization, which submits a detailed implementation plan to the Department of Environmental Management for its approval. The stewardship plan outlines how producers propose to implement the law by establishing collection locations and providing education and outreach. The bill also requires that solar panel producers meet a collection convenience goal and a combined performance goal for reuse and recycling. In addition, producers must cover DEM's oversight and enforcement costs and submit an annual report.

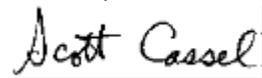
H 5525 would be strengthened, however, by including goals for a collection rate and recycling efficiency. Collection rate is defined as the percentage (by weight) of solar panels collected compared to the amount sold, while recycling efficiency is the percentage of solar panels recycled of those that are collected. Clear performance goals help both the stewardship organization and DEM determine the effectiveness of the program and decide if any changes are needed. Additionally, since no national program for the recycling of solar panels exists or is planned, *Section 9 23-19.17-9, National takeback programs as alternative*, should be removed.

The Product Stewardship Institute (PSI) is a national nonprofit working to reduce the health and environmental impacts of consumer products from design and production through end-of-life. With members from 47 state environmental agencies and hundreds of local governments, as well as 120 partners from companies, organizations, universities, and international governments, we promote product stewardship initiatives across North America. Over the past 20 years, PSI and its members have played a significant role in passing most of the 119 U.S. extended producer responsibility (EPR) laws on 14 products in 33 states, including the six EPR laws in Rhode Island.

We urge you to support solar panels EPR for the financial and environmental health of Rhode Island. Thank you for your consideration and leadership on this important issue.

If you have any questions or if I can be of assistance, please feel free to contact me at (617) 513-3954, or Scott@ProductStewardship.US.

Sincerely,

A handwritten signature in black ink that reads "Scott Cassel". The signature is written in a cursive style and is contained within a thin black rectangular border.

Scott Cassel
Chief Executive Officer/Founder