CPSC
California Product
Stewardship Council℠

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April 14, 2025

The Honorable Damon Connolly
Chair, Committee on Environmental Safety & Toxic Materials
1020 N Street, Room 171
Sacramento, CA 95814

Submitted via Position Letter Portal

RE: AB 864 (Ward) – Hazardous waste: solar photovoltaic modules. – SUPPORT

Dear Assemblymember Connolly,

The California Product Stewardship (CPSC) is a 501(c)(3) organization with an extensive network of local governments, non-government organizations, businesses, and individuals supporting policies and projects where producers share the responsibility for managing problem products at end-of-life. CPSC is pleased to **SUPPORT AB 864**: Hazardous waste: solar photovoltaic modules, to expand solar panel recycling opportunities for in-state waste generators.

California is currently listed as one of the top three states for annual solar capacity additions. In the next 25 years, rooftop solar installations are expected to continue increasing. [1] These installations, often subsidized, will decrease California homeowners' energy bills by as much as 75% and reduce reliance on fossil fuels.[2] The success of solar adoption has also led to a requisite increase in deinstallation across the state as panels near the end of their lifecycle.

According to the industry, solar panels have a lifespan of 20-30 years. Panel collection pilots led by CPSC showed the average age of panels entering the local government recycling programs is 9.1 years – far below their expected lifecycle. Homeowners frequently remove old panels that are broken, no longer working, and working panels that are swapped for newer systems with increased efficiency and energy generating capacity.[3]

Solar panels are one of the few products that are not accepted for free at most collection sites, like other universal or household hazardous waste. There are limited opportunities for solar panel owners dropping unwanted panels at a public collection site, or directly with recyclers. As more panels are removed from rooftops, more recycling opportunities are needed. Current DTSC rules for managing solar panel waste have limitations on how collectors can select and transfer the panels to a legitimate recycler and how that recycler can manage the panel.

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[1] Sage, Simon. "Surprising Report Pinpoints When Almost Half of Us Homes Will Switch to Solar - Here's Why Millions Are Installing Immediately." *The Cool Down*, 11 Jan. 2025, www.thecooldown.com/green-home/us-solar-panel-installations-households-2050-predict.

[2] Anil. "How Much Can Solar Save You in California?" *ENACT*, 2 Jan. 2025, enact.solar/how-much-can-solar-save-you-in-california/.

[3] Kobold, Doug. Brasch, Joanne. "Solar Panel Recycling Research from the Counties of Butte and San Mateo and the City of Santa Monica in California." *IEEE Photovoltaics Specialists Conference* 2020, www.calpsc.org/cpsc-solarstewardship

AB 864 provides DTSC with a pathway for alternative management standards for solar panels, so working and repairable panels go into reuse, and nonviable, nonhazardous panels can be safely recycled in or out-of-state. Allowing transfer-based exemption for solar panels to be more easily recycled out of state supports the growing demand for industry-funded recyclers managing take-back programs and decommissioning plans.

CPSC would like to see more industry-funded take-back programs, so alleviating barriers to improve voluntary programs is a good first step to establishing permanent, convenient programs for residents and businesses across the state. We continue to believe, however, that solar panels should be collected and managed pursuant to an industry-led extended producer responsibility (EPR) program and will continue to work toward that goal.

For these reasons, we are proud to **SUPPORT AB 864** and urge you to vote "AYE" on this critical measure when it is heard in your committee.

Sincerely,

Joanne Brasch
Director of Advocacy and Outreach

CC: The Honorable Christopher Ward, California State Assembly
        Members and Consultants, Environmental Safety and Toxic Materials Committee