

May 13, 2022

Laurie Davies
Director, Solid Waste Division
Washington Department of Ecology

Dear Laurie:

On behalf of our Washington Retail Association and the 4,500 storefronts we represent across the State of Washington, I am writing to respectfully request a delay in the producer registration deadline required under Senate Bill 5022 of May 18 to at least July 30, 2022.

Many of our members have store brands. The definition of “producer” was carefully crafted to address the complex relationship of name and store brands as manufactured, labeled, distributed, and sold in the retail industry.

On May 2nd we were told that retailers would now be responsible for registering all store brands except for those manufactured by contract in which there is a licensee agreement as part of the contract.

On May 9, we received notification that the DOE changed its interpretation of “producer” again. This creates additional work as manufacturers, suppliers, distributors, and retailers must again determine which entity is the producer under this new interpretation.

We appreciate your consideration of delaying the registration date. Washington Retail is ready to continue partnering with you on achieving the goals set forth in SB 5022.

Warm Regards,

Sincerely,



Renée Sunde
President & CEO
Washington Retail Association