



LightRecycle Washington 2020 Annual Report

For submission to:

Washington State Department of Ecology
Solid Waste Management Program
Attn: Al Salvi, Lindsey Ladd

Submitted by:

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1 Executive Summary

The Washington State Mercury-Containing Lights Product Stewardship Program, called LightRecycle Washington (the “Program” or “LRW”) began on January 1, 2015 for the collection and recycling of mercury-containing lights sold at retail.

Washington State residents and businesses can recycle up to 10 mercury-containing lights per day for free, by dropping them off at authorized collection sites throughout the State. Collection sites are required in every county and every city of 10,000 or more people. LRW continues to meet this requirement through its established collection network of over 200 registered sites, and by holding collection events in areas where no permanent collection site exists. Collectors include retailers, municipal waste facilities and residential curbside collection.

Collected lights are transported to the Program processor (recycler) using ground transport, where they are recycled as Universal Waste. Recovered mercury is retorted then reused or stored, and is managed by the processor in compliance with applicable local, state, and federal laws. Recycling mercury-containing lights protects the environment and human health by reducing the release of mercury into the environment and by recovering recyclables such as metals and glass.

The total amount of program mercury containing lamps collected in 2020 was 526,644 lbs., estimated to be 1,092,317 units. This volume represents approximately 68.6% of the annual collection target of 1,591,908 units, as committed to in the Program Plan Update submitted on January 1, 2017.

Advertising and promotion included print and digital ad campaigns. Collection sites and retailers were also sent printed marketing materials on request.

The Program is funded through an Environmental Handling Charge (EHC) added to the purchase price of each mercury-containing light sold at retail in or into Washington State. The current EHC is \$0.95 per unit for all program types. The Program is administered by PCA Product Stewardship (PCA), a 501(c)(3) non-profit organization. Greater details about the Program are contained in the report below.

2 Program Description

The Program has been developed pursuant to the provisions of Chapter 70A.505 of the Revised Code of Washington ([Chapter 70A.505 RCW](#)) “Mercury-containing lights-proper disposal” (the “Law”). This Plan complies with the requirements of the “Rule” prescribed in (Chapter 173-910 Washington Administrative Code ([Chapter 173-910 WAC](#))) where there is no conflict with the requirements of Chapter 70.275 RCW.

The Law requires that the Program be funded through an EHC added to the purchase price of each Mercury-containing light sold at retail in or into Washington State as of the program start date, January 1, 2015. The EHC was \$0.25 per unit for all program product types from the start of the program until June 30, 2017. On July 1, 2017, the EHC was increased to \$0.50 per unit for all program product types. On February 1, 2018, the EHC was increased to \$0.95 per unit for all program types. Each change in EHC was approved by the Department of Ecology.

Every Producer of mercury-containing lights sold in or into Washington State for retail sale must participate in a product stewardship program for those products. Participation in LRW is open to all Producers.

A network of collection sites has been established throughout Washington State that includes retailers, municipal waste facilities, collection events, and residential curbside collection. Washington State residents and businesses can recycle up to 10 mercury-containing lights per day for free, by dropping them off at authorized collection sites throughout the State.

Collected lights are transported to the Program processor (recycler) using ground transport, where they are recycled as Universal Waste. Recovered mercury is retorted then reused or stored, and is managed by the processor in compliance with applicable local, state, and federal laws.

LRW is administered by PCA, a 501(c)(3) non-profit organization.

3 Participating Producers

PCA Product Stewardship Inc. (PCA) has been designated as the Stewardship Organization for LRW. PCA administers the Program on behalf of all participating producers who sell mercury-containing lamps in or into Washington State.

PCA is a not-for-profit product stewardship organization incorporated in Oregon and registered in Washington (UBI number 603 226 459).

The participating producers in LRW are listed in Appendix A, along with their contact information and the associated brands they sell.

The total number of mercury-containing lights sold at retail in or into the state by participating producers in 2020, as reported by Program producers and remitting retailers, is provided in Table 1 below, by product category.

Table 1: Mercury-lights Sold at Retail in WA in 2020

Product Category	2020 Units Sold
Compact Fluorescent Lamps (CFL)	375,840
Fluorescent Tubes (All lengths and Shapes)	959,870
High Intensity Discharge (HID)	42,334
Total	1,378,044

The total number of mercury-containing lights sold at retail in or into the state by participating producers in 2019 was 1,633,640, so the 2020 sales represent an 15.6% decline in sales. This decline is attributed mainly to the transition to other lighting technologies, such as Light Emitting Diodes (LEDs), especially prominent in the CFL category.

4 Program Goals

To estimate the number of Program Products to be collected from 2016 - 2020, PCA used the 2015 actual collection data (as reported in the 2015 LightRecycle Washington Annual Report), as a baseline. As outlined in the Program Plan Update dated January 1, 2017, PCA established a collection goal of increasing collection by 10% annually. Table 2 below outlines the revised collection targets from 2016 – 2020, and the 2020 target is 1,591,908 units.

Table 2: 2016 - 2020 Collection Targets

Revised Targets	2015 Actual	2016	2017	2018	2019	2020
Total units collected	988,449	1,087,294	1,196,024	1,315,626	1,447,189	1,591,908
Annual Increase		10%	10%	10%	10%	10%

The amount of materials collected at registered collection sites and received by the Program processor in 2020 was 531,539 lbs. This weight includes any non-program materials that may have entered the collection system, however does not include lamps from Puget Sound Energy (PSE), who continue to operate an independent network of collection sites for CFLs and incandescent lights.

Upon receipt at the processor, each shipment is weighed. Weights are recorded separately for fluorescent tubes and mixed lamps, which are comprised of CFLs, HIDs and curved fluorescent tubes. Mixed lamps are sampled to determine the split of Program materials for those types. Weights of individual lamps were used to derive the number of units collected.

The total amount of program materials collected in 2020 was estimated at 526,644 lbs, which converts to 1,092,317 units, representing approximately 68.6% of the annual collection target of 1,591,908 units. The gap in collection volume in 2020, as compared to the target, is attributed to the decrease in collection site usage due to the Covid-19 pandemic; this is from both precautionary social measures and temporary site closures.

A breakdown of the materials collected in 2020 is provided in Table 3 and the graphic below:

Table 3: Program Materials Collected and Processed in 2020

Lamp Type	Weight Collected (lbs.)	Weight per Unit (lbs.) ¹	Units Collected
Fluorescent Tubes - 4' Straight	331,407	0.5	662,815
Fluorescent Tubes - 8' Straight	110,128	1	110,128
Fluorescent Tubes - Curved Shapes	13,030	0.25	52,118
CFLs (Compact Fluorescent Lamps)	65,761	0.25	263,044
HIDs (High Intensity Discharge)	6,318	1.5	4,212
Total	526,644		1,092,317
2020 Annual Target			1,591,908
Percentage of Goal			68.6%

5 Collection System

Collection Sites

By law, collection sites are required in every county and every city of 10,000 or more people. LRW met this requirement by establishing a collection network of close to 200 registered sites that collected all program products, and held collection events in areas where no permanent collection site could be placed. The program meets compliance requirements by holding collection events or advertising the locations of near-by collection sites. Ecology waived these compliance requirements, due to the pandemic.

At the end of 2020, LRW had a total of 281 registered collection sites, including:

- 187 sites that accept all program products
- 66 sites that accept CFLs only
- 28 additional sites that are unadvertised, that accept all program products

¹ Conversion rates used as outlined in the 2017 Program Plan Update, as approved by the Department of Ecology.

Only collection sites that are advertised and accept all program products meet the collection site requirements in the law. See Appendix C for a complete list of advertised collection sites by city and county.

Unadvertised sites include:

- Sites that accumulate lights but do not collect lights directly from residents or do not want to promote the collection of lights.
- Curbside collectors whose facilities are not suitable for public drop-off of lights for recycling.
-

Mercury-containing lights were collected at events that were held around the state that were either initiated or supported by the Program:

- King County Wastemobile
 - 12 locations, 63 days
 - 30,142 lbs. collected

Curbside Collectors

Two waste haulers that have curbside collection programs for mercury-containing lights are registered as LRW collectors. The names of the waste haulers and location of their corporate headquarters are:

- Recology/CleanScapes, Issaquah, WA
- Republic Services, Bellevue, WA

6 Processor

Name and Contact Information

EcoLights Northwest, LLC (“EcoLights”)
Contact: Davrin Miller
7021 South 220th Street,
Kent, Washington 98032
Phone: 206.388.5326

Total Mercury-containing Lights Processed

LRW collected 526,644 lbs. of program mercury-containing lights, all of which were processed by EcoLights.

Description of Processing Methods

Fluorescent Tubes: Fluorescent tubes are fed into a machine utilizing a controlled environment where the tubes are mechanically crushed and separated into the following components:

- Glass cullet
- Aluminum end caps
- Mercury phosphor powder

The glass cullet is sent to a Washington aggregate company for use in the manufacture of concrete. The aluminum endcaps are sold in Washington as scrap metal, and the mercury phosphor powder is shipped to an EPA regulated and approved mercury retort company in Indiana, where the mercury is removed from the powder and made available for future use in new products or processes such as the manufacture of fluorescent lamps. The clean phosphor powder is shipped for recovery of rare earth elements contained in the powder.

CFLs: Compact Fluorescent Lamps are fed into a separate processing machine designed to separate the glass from the CFL base, and capture the mercury, in a controlled environment. The glass portion is then fed into our straight tube processing machine and the bases are sent to a Washington-based electronics recycling company.

HIDs: High Intensity Discharge lamps are dismantled by hand or by machine. The outer glass envelope is removed, crushed and sent with other lamp glass to an aggregate company for use in concrete, the metal frame is sent to metal recyclers, and the mercury bearing glass ampules are sent to the same mercury retort for recovery of the mercury for use in new products or processes.

Other: Other types of lamps (U-tubes, circular, neon tubes, etc.) are processed in EcoLights straight tube recycling equipment, with components separated in the same manner into commodities to allow for further recycling.

Environmental Health and Safety

EcoLights processing equipment is equipped with pleated filters, HEPA filters, and sulfur impregnated carbon beds to capture dust and mercury vapor before the process air is returned to the processing room. The lamp processing room is also equipped with additional ventilation equipment designed to capture fugitive mercury that operates 24 hours per day. The building is not vented to the outside environment.

All technicians working in the lamp processing room are equipped with full face respirators designed to capture mercury and protect the employees. They also are equipped with personal protective equipment, including coveralls, steel toed boots, gloves and hairnets to minimize exposure to fugitive mercury in the processing room. All technicians undergo urine testing at hire to establish a baseline and every 6 months to ensure safe levels are maintained.

Transportation

Transportation is completed by these two methods:

1. Direct Dispatch – Collection sites contact EcoLights directly and pick-ups are scheduled to be completed by EcoLights or their parent company, Total Reclaim, or a third-party hauler.
2. FedEx – Box kits are sent out and returned via Fed-ex.

Compliance Audit Report

EcoLights Northwest provides PCA with an annual Compliance Audit Report completed by a qualified third party, which satisfies all the requirements of WAC 173-910-430 (6). Due to the associated risks of the Covid-19 pandemic a virtual audit was conducted.

EcoLights has not received any financial penalties, regulatory orders, or violations regarding the processing of lamps over the last three years.

7 Education and Outreach

Advertising and Promotion Completed

Due to the uncertainty of the financial sustainability of the program, as noted previously, and with the support of Ecology, advertising and promotion were limited in 2020.

- Collection sites and retailers were sent printed marketing materials on request.
- Print ads were run in seven newspapers to raise awareness of collection events or local collection sites as needed
- Printed marketing materials
 - Information cards (5" x 8") were provided to retailers, local governments and others.
 - Collection site posters were provided upon request.
 - Printed marketing materials can be ordered by phone, email or through the website and are provided at no charge.

Examples of marketing materials and advertisements used by the Program in 2020 are provided in Appendix D.

Assessment of Effectiveness

Advertising was designed primarily to create awareness of the program, drive the audience to the website and specifically to the collection site finder. However, the effectiveness of LRW outreach efforts cannot be gauged solely by the amount of website traffic or materials collected. Other factors such as the cumulative impact of advertising and outreach efforts in previous years can impact collection volumes. The long lifespan of program products also means that program use does not necessarily immediately follow a gain in program awareness.

8 Financial Report

The Program is funded through an EHC added to the purchase price of each mercury containing light sold at retail in or into Washington State. The EHC was \$0.25 per unit for all program product types from the start of the program until June 30, 2017. Due to declining sales volumes of mercury lights, particularly CFLs, the EHC was increased to keep the program financially viable, and the increase was approved by the Department of Ecology. The EHC, for all program product types was increased to \$0.50 per unit on July 2, 2017 and further increased to \$0.95 on February 1, 2018.

A breakdown of the revenue generated by the Program in 2020, as well as expenses for Program operations, communications, and administration is provided in Table 4.

Table 4 Program Financial Summary for 2020

Description	2020
Light Revenue	\$1,318,839
Retailer Offset	-\$8,007
Total Revenue	\$1,310,832
Program Expenses	\$706,612
Other Expenses	
Communication	\$14,042
Administration	\$129,509
Regulatory	\$84,062
Total Other Expenses	\$227,613
Total Expenses	\$934,225
Change in Net Assets	\$376,607
Net Assets, beginning of year	\$1,113,406
Net Assets, end of year	\$1,490,013

Appendix A: Participating Producers and Brands

The following table lists the Producers who participated in LightRecycle Washington during 2020.

Table 5: List of Participating Producers in 2020

	Company Name and Website	Phone	Address
1	Ace Hardware Corporation www.acehardware.com	630-990-6600	2200 Kensington Court Oak Brook, IL 60523
2	Apollo Horticulture www.apollohorticulture.com/	909-979-7392	2665 Pomona Blvd Pomona, CA 91768
3	Coleman Cable Inc. www.colemancable.com	800-323-9355	1530 Shields Drive Waukegan, IL 60085
4	Dolan Northwest LLC www.seattlelighting.com	503-972-5234	222 2nd Avenue Ext. South Seattle, WA 98134
5	Elong International USA Inc. (representing Do it Best Corp) www.elonginternational.com	972-247-7996	2425 McIver Lane #150 Carrollton, TX 75006
6	Energetic Lighting (Yankon Industries Inc.) www.energeticlighting.com	909-591-2345	13445 12th Street Chino, CA 91710
7	Eye Lighting International of North America, Inc. www.eyelighting.com	440-350-7000	9150 Hendricks Rd. Mentor, OH 44060
8	Feit Electric Company, Inc. www.feit.com	562-463- 2852	4901 Gregg Rd. Pico Rivera, CA 90660
9	General Electric Lighting www.gelighting.com	216-266-9729	1975 Noble Rd East Cleveland, OH 44112
10	Halco Lighting Technologies www.halcolighting.com	770-242-3612	PO Box 2834 Norcross, GA 30091-2834
11	Hawthorne Hydroponics LLC www.hawthorne-gardening.com	360-883-8846	3204 NW 38 th Circle Vancouver, WA 98660
12	LEDVANCE Corp www.ledvance.com	978-570-3000	200 Ballardvale Street Wilmington, MA 01887
13	Maxlite Inc. www.maxlite.com	973-244-7300	12 York Ave. West Caldwell, NJ 07006
14	OttLite Technologies, Inc www.ottlite.com	800-842-8848	220 W 7th Ave, Suite 100 Tampa FL 33602
15	Philips Lighting North America Corporation www.usa.philips.com	202-962-8567	200 Franklin Square Somerset, NJ 08873
16	Satco Products, Inc. www.satco.com	631-243-2022	110 Heartland Blvd. Brentwood, NY 11717

	Company Name and Website	Phone	Address
17	Technical Consumer Products Inc. www.tcpi.com	800-324-1496	325 Campus Drive Aurora, OH 44202
18	Ushio America, Inc. www.ushio.com	714-236-8600	5440 Cerritos Avenue Cypress, CA 90630
19	Venture Lighting International, Inc. www.venturelighting.com	800-451-2606	32000 Aurora Road - Suite A Solon, Ohio 44139
20	Westinghouse Lighting Corporation www.westinghouselighting.com	215-671-2000	12401 McNulty Road Philadelphia, PA 19154

The following brands were sold by producers who participated in LightRecycle Washington during 2020:

- | | |
|---|---------------------------------|
| 1. ACE | 32. MasterColor |
| 2. AllStart | 33. MaxLite |
| 3. ALTO | 34. Megalowmart |
| 4. Apollo Horticulture | 35. OSRAM |
| 5. Apollo Studios | 36. OttLite |
| 6. BEST CHOICE | 37. ParPro |
| 7. BRIGHT EFFECTS | 38. Philips |
| 8. Ceramalux Agro, Horticulture and HORTI | 39. ProLime |
| 9. Coleman Cable | 40. Purple Reign |
| 10. CVS | 41. Safeway – Bright Green |
| 11. Designers Edge | 42. Satco |
| 12. Destination Lighting | 43. Satco / HYGRADE |
| 13. Digimax | 44. SMART LIVING |
| 14. Do it Best | 45. Spectralux |
| 15. DOLLAR GENERAL | 46. Sunmaster |
| 16. Ecosmart | 47. Super Sprouter |
| 17. Eiko | 48. SYLVANIA |
| 18. Energetic Lighting | 49. TCP |
| 19. Energy Advantage | 50. Tospo Brand Lamps |
| 20. Energy Saver | 51. TuffGuard |
| 21. ENERGY SMART | 52. Ultra Sun |
| 22. EVERYDAY LIVING | 53. Urban Farmer |
| 23. Eye | 54. Ushio |
| 24. Eye Hortilux | 55. Utilitech |
| 25. Feit Electric | 56. Venture Lighting |
| 26. Finally | 57. Walgreen - Living Solutions |
| 27. GE | 58. Western Family |
| 28. GE Lighting Linear Fluorescent and CFLs | 59. Westinghouse |
| 29. Halco | 60. Woods |
| 30. Master | 61. Zoo |
| 31. Master SDW White SON | |

Appendix B: Collection and Processing Verification

The following letter from EcoLights confirms the amount of materials collected and processed by LightRecycle Washington during 2020.



7021 South 220th Street
Kent, WA 98032
T 206.343.7443
F 206.343.7445
ECOLIGHTS.COM

June 30th, 2021

LightRecycle Washington Program
PCA Product Stewardship Inc.

RE: 2020 Processing Volume

Dear LightRecycle Washington:

This letter is to acknowledge that Ecolights Northwest, LLC picked up or received the following volume of used fluorescent lamps and other materials from collection sites under the LightRecycle Washington program during 2020:

□ Total program material weight: 531,539 pounds

This volume includes some non-program materials, such as incandescent lamps in program containers.

Additional back-up documentation of these volumes is available.

We look forward to continuing to provide innovative lamp recycling services to PCA Product Stewardship Inc. and the residents and small businesses of Washington during the coming year.

If you have any questions, please contact me at 206-388-5200.

Sincerely,

Bobby Farris
CEO
EcoLights Northwest, LLC

www.EcoLights.com

REDUCE > REUSE > RECYCLE

Appendix C: Registered Collection Sites

The following tables list the registered LightRecycle Washington collection sites who participated in the Program during 2020. Please note, unadvertised sites have not been listed, to maintain confidentiality for those sites who wish to remain unadvertised.

Table 6: Registered Collection Sites who accept all Program Products:

	Collection Site Name	Street	City	State	ZIP Code	County
1	Othello Ace Hardware	420 E Main Street	Othello	WA	99344	Adams
2	Asotin County Regional Landfill	2901 6th Avenue	Clarkston	WA	99403	Asotin
3	Ace Hardware and Sporting Goods on Keene Road	103 Keene Road	Richland	WA	99352	Benton
4	Batteries Plus Bulbs	321 North Columbia Center Blvd.	Kennewick	WA	99336	Benton
5	Goodwill - West Richland	4034 W Van Giesen St. Suite B	West Richland	WA	99352	Benton
6	Grigg's Department Store Ace Hardware	1415 George Washington Way	Richland	WA	99354	Benton
7	Kennewick Ace Hardware and Sporting Goods	2831 W Kennewick Ave.	Kennewick	WA	99336	Benton
8	Patnode's True Value	600 9th St.	Benton City	WA	99320	Benton
9	Riders True Value	117 E Winew Country Rd.	Grandview	WA	98930	Benton
10	Lake Chelan Lighting Center	917 E Woodin Ave	Chelan	WA	98816	Chelan
11	Stan's Merry Mart	733 S. Wenatchee Ave.	Wenatchee	WA	98801	Chelan
12	Around Again	22 Gilbert Rd.	Sequim	WA	98382	Clallam
13	Central Transfer and Recycling	11034 NE 117th Avenue	Vancouver	WA	98662	Clark
14	Hi-School Ace Hardware	1605 W. Main Street	Battle Ground	WA	98604	Clark
15	Hi-School Ace Hardware	13009 NE Hwy. 99	Vancouver	WA	98686	Clark

16	Mt. Pleasant Transfer Facility	1111 MT. Pleasant Rd.	Washougal	WA	98671	Clark
17	Washougal Transfer Station	4020 S Grant Street	Washougal	WA	98671	Clark
18	West Van Materials Recovery Center	6601 NW Old Lower River Road	Vancouver	WA	98660	Clark
19	Columbia County Transfer Station	501 S Cottonwood Street	Dayton	WA	99328	Columbia
20	Bredfield's True Value Hardware	102 Cowlitz St West	Castle Rock	WA	98611	Cowlitz
21	Woodland Ace Hardware	1325 Lewis River Rd	Woodland	WA	98674	Cowlitz
22	City of Bridgeport	1007 Fairview Ave.	Bridgeport	WA	98813	Douglas
23	Rock Island Community Recycling Center	23 S Garden Ave.	Rock Island	WA	98850	Douglas
24	Town of Mansfield	Railroad	Mansfield	WA	98830	Douglas
25	Town of Waterville Community Recycling Center	720 N. Chelan Ave.	Waterville	WA	98858	Douglas
26	Ferry County Public Works - Solid Waste Div.	584 Torboy Dump Road	Republic	WA	99166	Ferry
27	Grigg's Department Store Ace Hardware	801 W Columbia St	Pasco	WA	99301	Franklin
28	Garfield County Public Works	19th and Arlington	Pomeroy	WA	99347	Garfield
29	Marty's True Value Hardware	205 E First Street	Mattawa	WA	99349	Grant
30	Skaug Brothers Ace Hardware	944 W Third Ave.	Moses Lake	WA	98837	Grant
31	LeMay's Central Transfer Station	4201 Olympic Highway	Aberdeen	WA	98520	Grays Harbor
32	Bayview Solid Waste Dropbox and Recycle Park	5790 S. Kramer Road	Langley	WA	98260	Island
33	Camano Island Transfer Station	75 E. Camano Hill Road	Camano Island	WA	98282	Island
34	Camano Plaza Ace	370 NE Camano Drive Ste #1	Camano Island	WA	98282	Island

35	Coupeville Solid Waste Complex	20018 State Highway 20	Coupeville	WA	98239	Island
36	Freeland Ace Hardware	1609 E. Main St.	Freeland	WA	98249	Island
37	North Whidbey Solid Waste Dropbox and Recycle Park	3151 Oak Harbor Road	Oak Harbor	WA	98277	Island
38	Oak Harbor Ace Hardware	150 SE Pioneer Way	Oak Harbor	WA	98277	Island
39	Jefferson County Disposal Site Quilcene	295312 Highway 101	Quilcene	WA	98376	Jefferson
40	Jefferson County Household Hazardous Waste Collection Facility	282 10th St., Bldg 19	Port Townsend	WA	98368	Jefferson
41	Jefferson County Recycle Center	325 County Landfill Road	Port Townsend	WA	98368	Jefferson
42	Bartell Drugs	23028 100th Ave W.	Edmonds	WA	98020-5080	King
43	Bartell Drugs	6939 Coal Creek Pkwy S.E.	Newcastle	WA	98059-3137	King
44	Bartell Drugs	7370 170th Ave NE	Redmond	WA	98052-4457	King
45	Bartell Drugs	526 228th Ave. N.E.	Sammamish	WA	98074-7226	King
46	Batteries Plus Bulbs	12816 SE 38th St.	Bellevue	WA	98006	King
47	Batteries Plus Bulbs	14917 NE 20th St.	Bellevue	WA	98007	King
48	Batteries Plus Bulbs	536 NE Northgate Way	Seattle	WA	98125	King
49	Batteries Plus Bulbs	17065 Southcenter Parkway	Tukwila	WA	98188	King
50	Bow Lake Recycling and Transfer Station	18800 Orillia Road S	Tukwila	WA	98188	King
51	City of Lake Forest Park	17425 Ballinger Way NE	Lake Forest Park	WA	98155	King
52	City of Snoqualmie	38624 SE River Street	Snoqualmie	WA	98065	King
53	Crescent Lighting	12629 NE 85th Street	Kirkland	WA	98033	King
54	Enumclaw Recycling and Transfer Station	1650 Battersby Ave E	Enumclaw	WA	98022	King

55	Factoria Household Hazardous Waste Drop Off Site	13800 SE 32nd St.	Bellevue	WA	98005	King
56	Fairwood Ace Hardware	14100 SE Petrovitsky Road	Renton	WA	98058	King
57	Hero Ace Hardware	1915 4th Ave	Seattle	WA	98101	King
58	Highlands Ace Hardware	4601 NE Sunset Blvd	Renton	WA	98059	King
59	Island Home Center & Lumber	17633 97th Pl SW	Vashon	WA	98070	King
60	Johnsons Home and Garden	26625 Maple Valley Black Diamond Rd.	Maple Valley	WA	98038	King
61	Junction True Value Hardware	4747 44th Ave S.W.	Seattle	WA	98116	King
62	Lake City Tweedy & Popp Hardware	3040 NE 127th St.	Seattle	WA	98125	King
63	Madison Park Hardware	1837 42nd Avenue East	Seattle	WA	98112	King
64	Maple Leaf Ace Hardware	9000 Roosevelt Way NE	Seattle	WA	98115	King
65	McLendon Hardware	23662 104th Ave. SE	Kent	WA	98031	King
66	McLendon Hardware	440 Rainier Ave. S	Renton	WA	98057	King
67	McLendon Hardware	10210 16th Ave. SW	White Center	WA	98146	King
68	McLendon Hardware	17705 130th Ave. NE	Woodinville	WA	98072	King
69	Mercer Island True Value Hardware	7707 SE 27th St. Suite 110	Mercer Island	WA	98040	King
70	North Bend Ace Hardware	330 Main Ave. S	North Bend	WA	98045	King
71	North Seattle Household Hazardous Waste Collection Facility	12550 Stone Avenue North	Seattle	WA	98133	King
72	Northshore Ace Hardware	35419 21ST Ave. S.W.	Federal Way	WA	98023	King
73	Northshore Senior Center	10201 E Riverside Dr.	Bothell	WA	98011	King
74	Pacific Supply	1417 12th	Seattle	WA	98122	King
75	Recolgy CleanScapes	317 NW Gilman Road #22	Issaquah	WA	98027	King
76	Recolgy CleanScapes	15235 Aurora Ave N. #102	Shorline	WA	98133-4416	King

77	Recology CleanScapes Burien Retail Store	16200 1st. S.	Burien	WA	98166	King
78	Recology CleanScapes Retail Store	22833 Bothell-Everett Hwy, #111	Bothell	WA	98021	King
79	Seattle Home Builders Center	1110 W Nickerson St.	Seattle	WA	98119	King
80	Second Use Building Materials	3223 6th Ave S	Seattle	WA	98134	King
81	Shoreline Recycling and Transfer Station	2300 N 165th Street	Shoreline	WA	98133	King
82	South Seattle Household Hazardous Waste Collection Facility	8100 2nd Avenue South	Seattle	WA	98108	King
83	Stoneway Hardware and Supply	4318 Stone Way N.	Seattle	WA	98103	King
84	Stoneway Hardware Ballard	4910 15th Ave NW	Seattle	WA	98107	King
85	Total Reclaim	7021 S 220th St	Kent	WA	98032	King
86	Town Center Hardware	6613 132 AVE N.E.	Kirkland	WA	98033	King
87	Town Center Hardware	17171 Bothell Way NE	Lake Forest Park	WA	98155	King
88	Vashon Recycling and Transfer Station	18900 Westside Hwy SW	Vashon	WA	98070	King
89	Wallingford Tweedy & Popp Hardware	1815 N 45th St. Ste. 112	Seattle	WA	98103	King
90	Crown Hill Tweedy and Popp Hardware	9000 Holman Rd. NW	Seattle	WA	98117	King
91	Bainbridge Island Ace Hardware	635 High School Road NE	Bainbridge Island	WA	98110	Kitsap
92	Household Hazardous Waste Collection Facility	5551 SW Imperial Way	Bremerton	WA	98312	Kitsap
93	Scott McLendon's Hardware	1692 Mile Hill Dr.	Port Orchard	WA	98366	Kitsap
94	Swain's General Store	602 E 1st St	Port Angeles	WA	98362	Kitsap
95	Thurman Supply	1807 East Front Street	Port Angeles	WA	98362	Kitsap

96	HopeSource	700 E. Mountain View, Suite 501	Ellensburg	WA	98926	Kittitas
97	Woods Ace Hardware	310 North Pearl Street	Ellensburg	WA	98926	Kittitas
98	Allyns Building Center	517 N Mill St.	Goldendale	WA	98620	Klickitat
99	BZ Corners Transfer Station	5 Firtee Rd	Husum	WA	98623	Klickitat
100	Dallesport Transfer Station	126 Tidyman Rd	Dallesport	WA	98617	Klickitat
101	Goldendale Transfer Station	1205 W Broadway St.	Goldendale	WA	98920	Klickitat
102	Lewis County Solid Waste	1411 So Tower Ave.	Centralia	WA	98531	Lewis
103	Mason County Landfill	501 Eells Hill Rd	Shelton	WA	98584	Mason
104	Scott McLendon's Hardware	51 NE State Route 300	Belfair	WA	98528	Mason
105	Ellisforde Transfer Station	65 Swanson Mill Rd.	Oroville	WA	98844	Okanogan
106	Lee Frank Mercantile	324 S. Whitcomb ave.	Tonasket	WA	98855	Okanogan
107	Methow Recycles	12 Twisp Airport Road	Okanogan	WA	98856	Okanogan
108	Okanogan County Central Landfill	241 North B&O Rd.	Okanogan	WA	98840	Okanogan
109	Pacific County Household Hazardous Waste Facility	318 N Second St.	Long Beach	WA	98631	Pacific
110	Ace Hardware	4816 Pt. Fosdick Dr. NW	Gig Harbor	WA	98335	Pierce
111	Bartell Drugs	2700 Bridgeport Wy W Suite D	University Place	WA	98466-4600	Pierce
112	Batteries Plus Bulbs	31830 Pacific Hwy S	Federal Way	WA	98003	Pierce
113	Batteries Plus Bulbs	10210 123rd St. Ct. E	Puyallup	WA	98374	Pierce
114	Batteries Plus Bulbs	4027 Tacoma Mall Blvd.	Tacoma	WA	98409	Pierce
115	Crescent Lighting	3214 20th Street East	Fife	WA	98424	Pierce
116	Graham Ace Hardware	9807 224TH ST E SUITE 108	Graham	WA	98338	Pierce
117	JBLM DPW Environmental Operations	Bldg. 1210 Mann Ave. Box 339500 MS #17	Joint Base LewisMcChord	WA	98433	Pierce
118	Lakewood Ace Hardware	8123 Steilacoom Blvd. SW	Lakewood	WA	98498	Pierce
119	Lincoln Hardware	3726 South G Street	Tacoma	WA	98418	Pierce

120	McLendon Hardware	11307 Canyon Rd. E	Puyallup	WA	98373	Pierce
121	McLendon Hardware	1111 Fryer Ave.	Sumner	WA	98390	Pierce
122	McLendon Hardware	1015 N. Pearl Street	Tacoma	WA	98406	Pierce
123	Ace Hardware of Friday Harbor	340 Argyle Avenue	Friday Harbor	WA	98250	San Juan
124	CT Recycling	6739 Roche Harbor Road	Friday Harbor	WA	98250	San Juan
125	Lopez Solid Waste	2449 Fisherman Bay Road	Lopez Island	WA	98261	San Juan
126	The Exchange/Orcas Recycling Services	3398 Orcas Road	Eastsound	WA	98245	San Juan
127	Ace Hardware of Anacortes	1720 "Q" Avenue	Anacortes	WA	98221	Skagit
128	Chuckanut Lighting	938 Fountain St.	Burlington	WA	98233	Skagit
129	City Recycling Center	315 Sterling Street	Sedro-Woolley	WA	98284	Skagit
130	Ekrem Hardware Do-It Center	237 E. Fairhaven Ave.	Burlington	WA	98233	Skagit
131	Kaptein's Ace Hardware	1420 Riverside Dr.	Mount Vernon	WA	98273	Skagit
132	Skagit County Household Hazardous Waste Facility	14104 Ovenell Rd	Mount Vernon	WA	98273	Skagit
133	Columbia Hardware	24 NE 2nd St	Stevenson	WA	98648	Skamania
134	J & L Farm & Home	961 Wind River Road	Carson	WA	98610	Skamania
135	Stevenson Transfer Facility	1332 Ryan Allen Rd.	Stevenson	WA	98648	Skamania
136	Underwood Transfer Facility	1402 Little Buck Creek Rd.	Underwood	WA	98650	Skamania
137	Ace Hardware	303 91st Ave NE	Lake Stevens	WA	98258	Snohomish
138	Ace Hardware of Evergreen Way	4835 Evergreen Way	Everett	WA	98203	Snohomish
139	Ace Hardware of Silver Lake	11014 19th Avenue SE Ste. 100	Everett	WA	98208	Snohomish
140	Airport Road Recycling & Transfer Station	10700 Minuteman Dr.	Everett	WA	98204	Snohomish
141	Bartell Drugs	6602 64th Street NE	Marysville	WA	98270-4834	Snohomish
142	Batteries Plus Bulbs	909 SE Everett Mall Way	Everett	WA	98208	Snohomish
143	Batteries Plus Bulbs	4028 196th St. SW	Lynnwood	WA	98036	Snohomish

144	Batteries Plus Bulbs	4008 172nd St NE, Suite D	Arlington	WA	98223	Snohomish
145	Cedar Plaza Ace Hardware	22803 44th Ave. West Suite D-2	Mountlake Terrace	WA	98043	Snohomish
146	City of Mill Creek	15728 Main Street	Mill Creek	WA	98012	Snohomish
147	City of Monroe	City Hall at City of Monroe	Monroe	WA	98272	Snohomish
148	Darrington Hardware & Supply	1220 SR 530 NE	Darrington	WA	98241	Snohomish
149	Dubuque Road Neighborhood Recycling & Disposal Center	19619 Dubuque Road	Snohomish	WA	98290	Snohomish
150	Edmonds Hardware and Paint	201 5th Ave. S Suite 206	Edmonds	WA	98020	Snohomish
151	Granite Falls Neighborhood Recycling & Disposal Center	7526 Menzel Lake Road	Granite Falls	WA	98252	Snohomish
152	Homegrown Hydros	1241 State Ave, #102	Marysville	WA	98270-4834	Snohomish
153	Household Hazardous Waste Drop-off Station	3434 McDougall Ave.	Everett	WA	98201	Snohomish
154	Mukilteo Ace Hardware	12680 Mukilteo Speedway	Mukilteo	WA	98275	Snohomish
155	North County Recycling & Transfer Station	19600 63rd Ave. NE	Arlington	WA	98223	Snohomish
156	Southwest Recycling & Transfer Station	21311 61st Place West	Mountlake Terrace	WA	98043	Snohomish
157	Stanwood Ace Hardware	26477 72nd Ave NW	Stanwood	WA	98292	Snohomish
158	Sultan Neighborhood Recycling & Disposal Center	33014 Cascade View Drive	Sultan	WA	98294	Snohomish
159	Ace Hardware and Paint	906 S. Monroe	Spokane	WA	99204	Spokane
160	Batteries Plus Bulbs	11101 East Sprague	Spokane	WA	99206	Spokane
161	Batteries Plus Bulbs	7704 North Division Suite C	Spokane	WA	99208	Spokane
162	City of Cheney Recycling Center	100 Anderson Road	Cheney	WA	99004	Spokane
163	Deer Park Ace Hardware	141 West H Street	Deer Park	WA	99006	Spokane

164	South Hill Ace Hardware	4416 S. Regal St.	Spokane	WA	99223	Spokane
165	Spokane Valley Ace Hardware	15405 E. Sprauge Ave	Spokane Valley	WA	99037	Spokane
166	Sunshine Disposal and Recycling	2405 N. University Rd.	Spokane Valley	WA	99206	Spokane
167	Wandermere Ace Hardware	12908 N. Hwy. 395	Spokane	WA	99218	Spokane
168	Waste Connections of Spokane	22123 N. Elk-Chattaroy Road	Colbert	WA	99005	Spokane
169	Waste Connections of Spokane	3941 North Sullivan Road	Spokane Valley	WA	99216	Spokane
170	Colville Hardware Do It Center	984 S. Main St.	Colville	WA	99114	Stevens
171	Sety's Ace Hardware	301 E. Main	Chewelah	WA	99109	Stevens
172	Batteries Plus Bulbs	2905 Capital Mall Dr. SW	Olympia	WA	98502	Thurston
173	Lincoln Creek Lumber/Ace Hardware	2421 93rd Ave SW	Tumwater	WA	98512	Thurston
174	Olympia Ace Hardware	400 Cooper Point Road	Olympia	WA	98502	Thurston
175	Thurston County Hazohouse	2420 Hogum Bay Rd NE	Lacey	WA	98516	Thurston
176	Batteries Plus Bulbs	632 South 9th Ave.	Walla Walla	WA	99362	Walla Walla
177	Sudbury Regional Landfill, City of Walla Walla	414 Landfill Rd.	Walla Walla	WA	99362	Walla Walla
178	Ace Hardware	1736 Front Street	Lynden	WA	98264	Whatcom
179	Ferndale Ace Hardware	5715 4th Ave.	Ferndale	WA	98248	Whatcom
180	Pacific Building Center - True Value Hardware	2677 Bell Road	Blaine	WA	98230	Whatcom
181	WFC Blaine Ace Hardware	1733 H Street Suite 700	Blaine	WA	98230	Whatcom
182	WFC Fairhaven True Value	3125 Old Fairhaven Parkway	Bellingham	WA	98225	Whatcom
183	WFC Fairway True Value	119 17th St.	Lynden	WA	98264	Whatcom
184	Whatcom County Disposal of Toxics Facility	3505 Airport Drive	Bellingham	WA	98226	Whatcom
185	Pullman Disposal Service	135 NW Harold Dr.	Pullman	WA	99163	Whitman

186	Whitman County Public Works Solid Waste Facility	252 Landfill Road	Pullman	WA	99163	Whitman
187	City of Sunnyside	818 East Edison	Sunnyside	WA	98944	Yakima

Table 7: Registered Collection Sites who accept CFLs only:

	Collection Site Name	Street	City	State	ZIP Code	County
1	Clark Public Utilities - Electric Center	1200 Fort Vancouver Way	Vancouver	WA	98663	Clark
2	Clark Public Utilities - Operations Office	8600 NE 117 Ave.	Vancouver	WA	98662	Clark
3	Bartell Drugs	3902 "A" St. S.E.	Auburn	WA	98002-8610	King
4	Bartell Drugs	10116 NE 8th Street	Bellevue	WA	98004-4148	King
5	Bartell Drugs	11919 NE 8th St.	Bellevue	WA	98005-3023	King
6	Bartell Drugs	3620 Factoria Blvd. SE	Bellevue	WA	98006-6128	King
7	Bartell Drugs	653 156th Ave NE	Bellevue	WA	98007-4823	King
8	Bartell Drugs	18001 Bothell-Everett Hwy, Suite 101	Bothell	WA	98012-1660	King
9	Bartell Drugs	22833 Bothell-Everett Hwy	Bothell	WA	98021-9385	King
10	Bartell Drugs	14901 4th Ave SW, Suite 100	Burien	WA	98166-1906	King
11	Bartell Drugs	21615 Pacific Hwy S.	Des Moines	WA	98198-7703	King
12	Bartell Drugs	27055 Pacific Hwy S.	Des Moines	WA	98198-9250	King
13	Bartell Drugs	5700 East Lake Sammamish Pkwy SE	Issaquah	WA	98029-8914	King
14	Bartell Drugs	12946 SE Kent-Kangley Rd.	Kent	WA	98030-7940	King
15	Bartell Drugs	10625 N.E. 68th	Kirkland	WA	98033-7054	King
16	Bartell Drugs	14130 Juanita Dr. N.E Ste. 107	Kirkland	WA	98034-0127	King
17	Bartell Drugs	14442 124th Ave. N.E.	Kirkland	WA	98034-4801	King
18	Bartell Drugs	6619 132nd Ave. N.E.	Kirkland	WA	98033-8627	King
19	Kirkland City Hall	123 5th Ave	Kirkland	WA	98033	King
20	Bartell Drugs	2518 196th St SW	Lynnwood	WA	98036	King
21	Bartell Drugs	22117 SE 237th St.	Maple Valley	WA	98038-8533	King
22	Bartell Drugs	248 Bendigo Boulevard South	North Bend	WA	98045	King

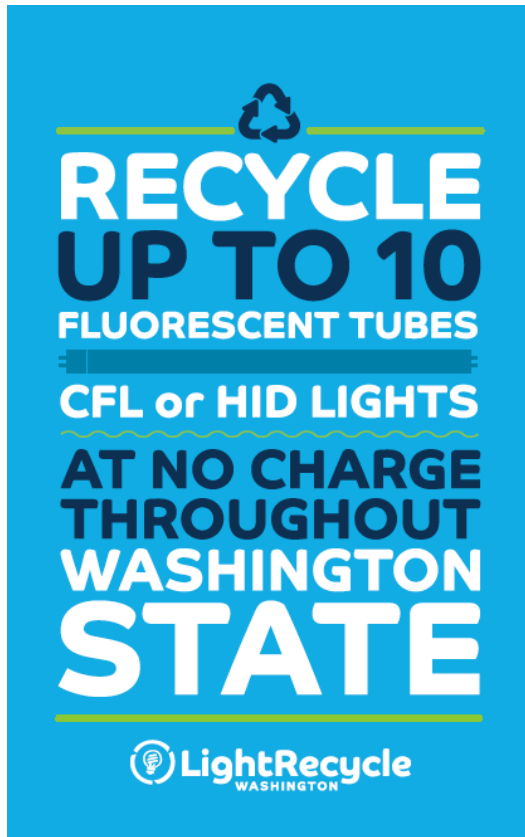
	Collection Site Name	Street	City	State	ZIP Code	County
23	Bartell Drugs	8862 161st Ave NE,Suite 102	Redmond	WA	98052-7553	King
24	Bartell Drugs	17254 140th Ave SE	Renton	WA	98058-7014	King
25	Bartell Drugs	4700 NE 4th Street	Renton	WA	98059-4800	King
26	Bartell Drugs	2222 32nd Ave. W.	Seattle	WA	98199-4044	King
27	Bartell Drugs	910 Fourth Ave	Seattle	WA	98164-1000	King
28	Bartell Drugs	100 N 85th St.	Seattle	WA	98103-3602	King
29	Bartell Drugs	1001 Mercer Street	Seattle	WA	98109-4234	King
30	Bartell Drugs	1101 Madison St.	Seattle	WA	98104-1306	King
31	Bartell Drugs	1404 Third Ave.	Seattle	WA	98101-2106	King
32	Bartell Drugs	1407 Broadway Ave.	Seattle	WA	98122-3854	King
33	Bartell Drugs	1500 NW Market Street, Suite 101	Seattle	WA	98107-5211	King
34	Bartell Drugs	1628 Fifth Avenue	Seattle	WA	98101-1606	King
35	Bartell Drugs	1820 N 45th St.	Seattle	WA	98103-6803	King
36	Bartell Drugs	1929 Queen Anne Ave. N	Seattle	WA	98109-2549	King
37	Bartell Drugs	2345 Rainier Ave. South	Seattle	WA	98144-5348	King
38	Bartell Drugs	2345-42nd Avenue SW	Seattle	WA	98116-2513	King
39	Bartell Drugs	2700 NE University Village St.	Seattle	WA	98105-5016	King
40	Bartell Drugs	3018 NE 125th Street	Seattle	WA	98125-4424	King
41	Bartell Drugs	4344 University Way N.E.	Seattle	WA	98105-5809	King
42	Bartell Drugs	4706 42nd Ave. S.W.	Seattle	WA	98116-4500	King
43	Bartell Drugs	600 First Ave. N.	Seattle	WA	98109-4001	King
44	Bartell Drugs	6401 12th Ave NE	Seattle	WA	98115-6754	King
45	Bartell Drugs	9600 15th Ave. S.W.	Seattle	WA	98106-2820	King

	Collection Site Name	Street	City	State	ZIP Code	County
46	Seattle City Light	1300 N. 97th St.	Seattle	WA	98103	King
47	Seattle City Light	3613 4th Ave. S.	Seattle	WA	98134	King
48	Bartell Drugs	400 S Jackson St Ste 300	Seattle	WA	98104	King
49	Bartell Drugs	5625 22nd AVE NW	Seattle	WA	98107	King
50	Bartell Drugs	18420 Aurora Ave N	Shoreline	WA	98133-4416	King
51	Bartell Drugs	14277 Pacific Hwy. S.	Tukwila	WA	98168-4124	King
52	Bartell Drugs	5500 Olympic Drive	Gig Harbor	WA	98335-1487	Pierce
53	Bartell Drugs	3601 6th Ave S	Tacoma	WA	98406-5405	Pierce
54	Orcas Power and Light Cooperative	183 Mt. Baker Rd.	Eastsound	WA	98245	San Juan
55	Orcas Power and Light Cooperative	1034 Guard St.	Friday Harbor	WA	98250	San Juan
56	Bartell Drugs	11020 19th Ave. S.E.	Everett	WA	98208-5155	Snohomish
57	Bartell Drugs	1825 Broadway	Everett	WA	98201-2348	Snohomish
58	Bartell Drugs	5006 132nd ST SE Building A	Everett	WA	98208-9517	Snohomish
59	Bartell Drugs	621 SR9 N.E.	Lake Stevens	WA	98258-8525	Snohomish
60	Bartell Drugs	17633 Highway 99	Lynnwood	WA	98037-3627	Snohomish
61	Bartell Drugs	3625 148th St., SW, Suite B	Lynnwood	WA	98087-5522	Snohomish
62	Bartell Drugs	22803 44th Ave. W.	Mountlake Terrace	WA	98043-5032	Snohomish
63	Bartell Drugs	1115 13th St.	Snohomish	WA	98290-2012	Snohomish
64	Bartell Drugs	7205 267th St. NW	Stanwood	WA	98292-6237	Snohomish
65	Everett Community College	2000 Tower Street	Everett	WA	98201	Snohomish
66	Bellingham Ace Hardware	356 36 th St.	Bellingham	WA	98225	Whatcom

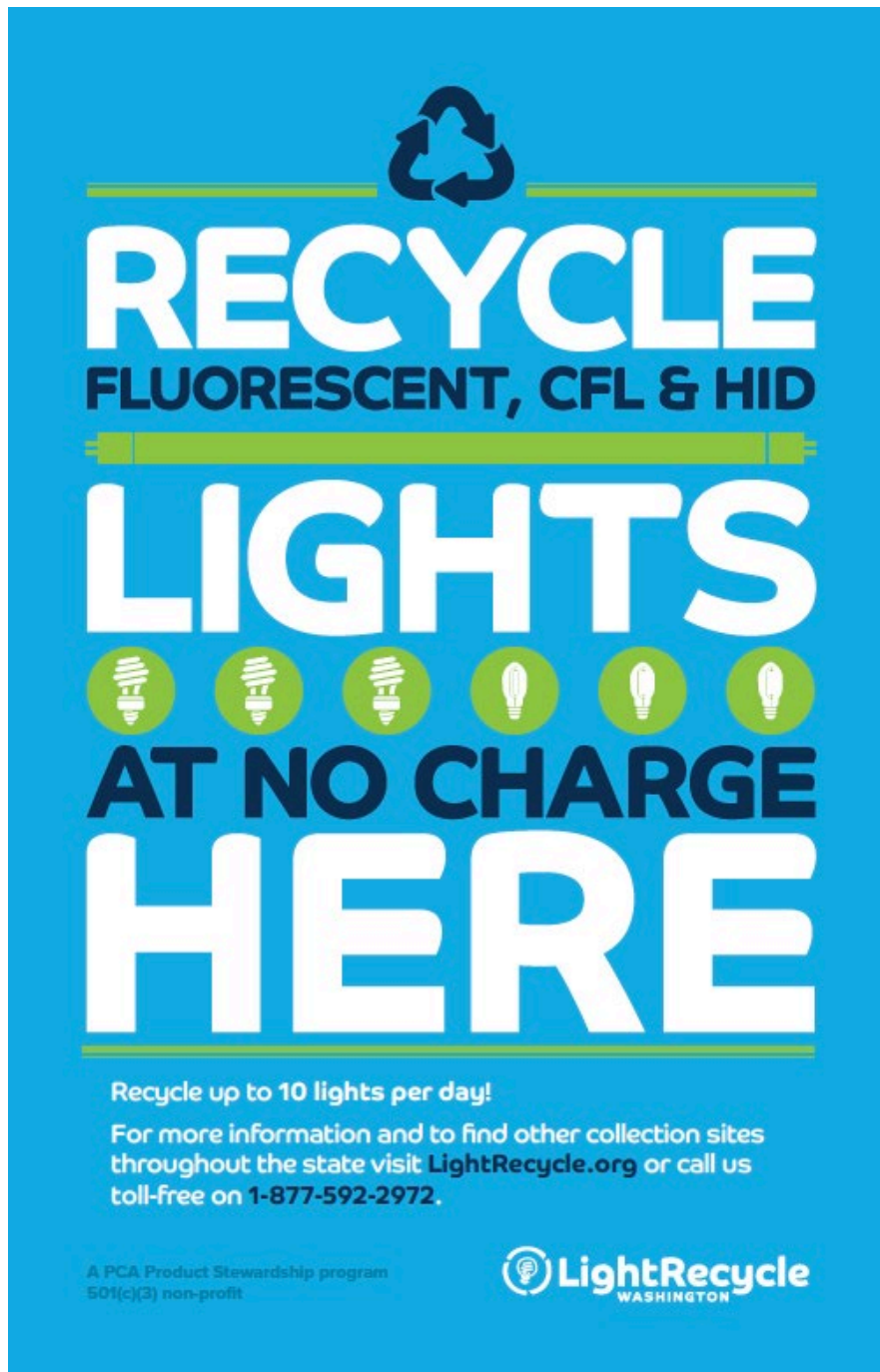
Appendix D: Advertising and Promotional Materials

The following images are examples of the advertising and promotional materials used by LightRecycle Washington in 2020.

Information Card, 5" x 8" Updated in 2017



Collection Site Posters, 11" x 17"



Newspaper Advertisements (exact dimensions vary)



Two cartoon light bulbs with faces and arms are standing on a blue background. The one on the left is a fluorescent tube, and the one on the right is a compact fluorescent bulb (CFL). Both are smiling and waving.

FREE Fluorescent Light and CFL Collection Event

**Ramm Hardware,
5 West 1st Ave. Odessa, WA
September 27 | 8am – 5pm**

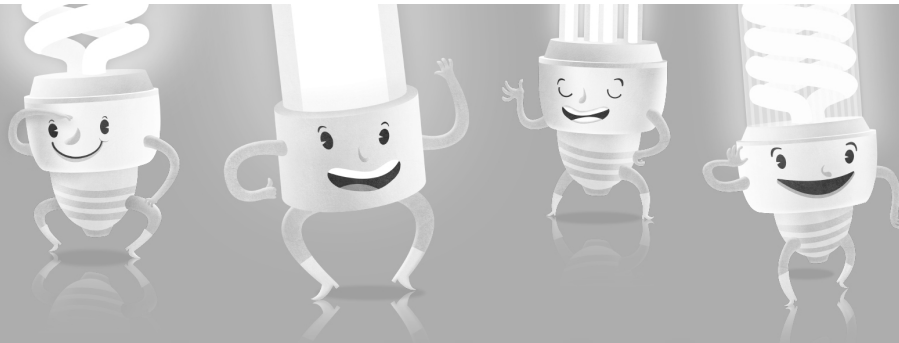
✓
Accepted Products



Five circular icons representing different types of light bulbs: a fluorescent tube, a U-shaped fluorescent tube, a pin-point fluorescent tube, a compact fluorescent bulb (CFL), and a standard incandescent bulb.

Fluorescent Tubes (all shapes), Compact Fluorescent Lights (CFLs)
and High Intensity Discharge (HIDs) Lights

LightRecycle.org  **LightRecycle**
WASHINGTON



Recycle your lights for free in Washington State!

It's never been easier to recycle fluorescent lights and CFLs. You can drop off up to 10 lights per day for free at:

1

Washougal Transfer Station
4020 S Grant Street
Washougal, WA

2

Mt. Pleasant Transfer Facility
1111 MT. Pleasant Rd.
Washougal, WA

lightrecycle.org

 **LightRecycle**
WASHINGTON



Recycle lights for free in Washington State!

**It's never been easier to recycle fluorescent lights
and CFLs. You can drop off up to 10 lights per day
for free at:**

Longview Ace Hardware
600 Triangle Mall
Longview, WA

lightrecycle.org



Appendix E: Third Party Financial Audit Report

The following report is the third party financial audit report for LightRecycle Washington revenue and expenses during 2020, and was conducted by Moss Adams LLP, certified public accountants.



REPORT OF INDEPENDENT AUDITORS
AND FINANCIAL STATEMENTS

PCA PRODUCT STEWARDSHIP, INC.

December 31, 2020

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Statement of financial position	3
Statement of activities	4
Statement of functional expenses	5
Statement of cash flow	6
Notes to financial statements	7–11

Report of Independent Auditors

To the Board of Directors
PCA Product Stewardship, Inc.

Report on the Financial Statements

We have audited the accompanying financial statements of PCA Product Stewardship, Inc., which comprise the statement of financial position as of December 31, 2020 and the related statements of activities, functional expenses, and cash flows for the year then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of PCA Product Stewardship, Inc. as of December 31, 2020, and the changes in its net assets and its cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Moss Adams LLP

Portland, Oregon
April 15, 2021

PCA Product Stewardship, Inc.
Statement of Financial Position
December 31, 2020

ASSETS

Cash and cash equivalents	\$ 1,452,291
Accounts receivable	97,844
Property and equipment, net	846
Other assets	<u>1,353</u>
Total assets	<u><u>\$ 1,552,334</u></u>

LIABILITIES AND NET ASSETS

LIABILITIES

Accounts payable	<u>\$ 62,321</u>
Total liabilities	62,321

NET ASSETS

Without donor restrictions	<u>1,490,013</u>
Total net assets	<u>1,490,013</u>
Total liabilities and net assets	<u><u>\$ 1,552,334</u></u>

PCA Product Stewardship, Inc.
Statement of Activities
Year Ended December 31, 2020

PROGRAM REVENUE	\$ 1,310,831
EXPENSES	
Program services	849,792
Supporting services	<u>84,432</u>
Total expenses	<u>934,224</u>
CHANGE IN NET ASSETS	376,607
NET ASSETS, beginning of year	<u>1,113,406</u>
NET ASSETS, end of year	<u><u>\$ 1,490,013</u></u>

PCA Product Stewardship, Inc.
Statement of Functional Expenses
Year Ended December 31, 2020

	Program Services	Supporting Services	
	Lightbulb Recycling	General and Administrative Expenses	Total Expenses
EXPENSES			
Processing	\$ 395,430	\$ -	\$ 395,430
Transportation	221,030	-	221,030
Supplies and maintenance	90,153	-	90,153
Regulatory compliance	84,062	-	84,062
Management fee	-	70,480	70,480
Professional fees	21,643	13,952	35,595
Advertising and promotion	12,000	-	12,000
IT services	10,058	-	10,058
Insurance	9,701	-	9,701
Depreciation	3,954	-	3,954
Dues, licenses, and fees	1,098	-	1,098
Awareness studies and other research	362	-	362
Miscellaneous	294	-	294
Travel	7	-	7
	<u>7</u>	<u>-</u>	<u>7</u>
Total expenses	<u>\$ 849,792</u>	<u>\$ 84,432</u>	<u>\$ 934,224</u>

PCA Product Stewardship, Inc.
Statement of Cash Flow
Year Ended December 31, 2020

CASH FLOWS FROM OPERATING ACTIVITIES	
Change in net assets	\$ 376,607
Adjustments to reconcile change in net assets to net cash from operating activities:	
Depreciation	3,954
Change in cash and cash equivalents due to:	
Accounts receivable and other assets	(47,121)
Accounts payable	<u>(94,225)</u>
Net cash from operating activities	239,215
CHANGE IN CASH AND CASH EQUIVALENTS	239,215
CASH AND CASH EQUIVALENTS, beginning of year	<u>1,213,076</u>
CASH AND CASH EQUIVALENTS, end of year	<u><u>\$ 1,452,291</u></u>

Note 1 – Organization

PCA Product Stewardship, Inc. (the Organization or PCAPSI), is a non-profit 501(c)(3) organization that formed in 2010 in the state of Oregon. The Organization's mission is to (a) operate environmentally sound and cost-effective product stewardship programs which include the collection, transportation, and processing of post-consumer products for end-of-product-life management; (b) assist in the development and implementation of strategies to reduce the generation of post-consumer household waste; and (c) engage in any other lawful related purpose. To advance such purposes, the Organization may also: (d) promote the reuse of post-consumer products, and (e) educate consumers about collection opportunities for post-consumer products and promote waste prevention, reuse, and recycling.

The Organization is controlled by Product Care Association of Canada, a Canadian-based not-for-profit corporation with similar organizational goals. See further discussion of related-party transactions in Note 5.

In January 2015, the Organization implemented an industry sponsored product stewardship program for light bulbs containing mercury in the state of Washington.

During 2016, the sunset date for the industry sponsored product stewardship program for light bulbs containing mercury in the state of Washington was extended to July 1, 2025. After July 1, 2025, the stewardship law and program will undergo a sunset review by the Joint Legislative Audit and Review Committee.

Note 2 – Summary of Significant Accounting Policies

Basis of accounting – The accompanying financial statements have been prepared on the accrual basis of accounting in accordance with accounting principles generally accepted in the United States of America.

Basis of presentation – Net assets, revenues, gains, and losses are classified based on the existence or absence of donor or grantor-imposed restrictions. Accordingly, net assets and changes therein are classified and reported as follows:

- **Net assets without donor restrictions** – Net assets available for use in general operations and not subject to donor-imposed stipulations.
- **Net assets with donor restrictions** – Net assets subject to donor-imposed stipulations that may or will be met, either by actions of the Organization and/or the passage of time. When a restriction is met, net assets with donor restrictions are reclassified to net assets without donor restrictions and reported in the statement of activities as net assets released from restrictions. There were no net assets with donor restrictions as of December 31, 2020.

PCA Product Stewardship, Inc.

Notes to Financial Statements

Note 2 – Summary of Significant Accounting Policies (continued)

Cash and cash equivalents – For purposes of financial statement classification, PCAPSI considers all unrestricted, highly-liquid investments with an initial maturity of three months or less to be cash and cash equivalents.

Accounts receivable – Accounts receivable as of December 31, 2020 is comprised of amounts due from members related to the prior month's light bulb recycling as these amounts are contractually due to PCAPSI. Management has concluded the accounts receivable balance is collectible and there is no need for an allowance for doubtful accounts. Furthermore, the Organization has not written off any such amounts during the year ended December 31, 2020.

Property and equipment – Property and equipment are stated at cost less accumulated depreciation and are depreciated using the straight-line method over their estimated useful lives, which generally range from three to five years. It is PCAPSI's policy to capitalize property and equipment over \$2,000.

Expense allocation – The costs of providing various programs and supporting services have been summarized on a functional basis in the statement of functional expenses. Accordingly, certain costs have been allocated among the programs and supporting services based on the relative benefit attributed to each of the programs and supporting services.

Advertising – PCAPSI expenses advertising costs as incurred. Advertising costs include activities to create or stimulate a desire to use services that are provided without charge. Advertising expense totaled \$12,000 for the year ended December 31, 2020.

Income taxes – PCAPSI is exempt from federal and state income taxes under Section 501(c)(3) of the Internal Revenue Code and is further classified as a public charity under Section 509(a)(2) and not as a private foundation. No provision for income taxes is made in the accompanying financial statements, as the Organization has no activities subject to unrelated business income tax.

PCAPSI recognizes the tax benefit from uncertain tax positions only if it is more likely than not that the tax positions will be sustained on examination by the tax authorities, based on the technical merits of the position. The tax benefit is measured based on the largest benefit that has a greater than 50% likelihood of being realized upon ultimate settlement. PCAPSI recognizes interest and penalties related to income tax matters, if any, in general and administrative expense. PCAPSI had no uncertain tax positions as of December 31, 2020.

PCAPSI had no unrecognized tax benefits as of December 31, 2020. No interest and penalties were accrued for the year ended December 31, 2020. PCAPSI files an exempt organization return in the U.S. federal jurisdiction.

Note 2 – Summary of Significant Accounting Policies (continued)

Use of estimates – The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires that management make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements, and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Recently adopted standards – The Organization's significant accounting policy for revenue was updated as a result of the adoption of Financial Accounting Standards Board (FASB) Accounting Standards Update (ASU) No. 2014-09 *Revenue from Contracts with Customers* (ASU No. 2014-09). The Organization recognizes revenue in accordance with the five-step model as prescribed by ASU No. 2014-09 in which the Organization evaluates the transfer of promised goods or services and recognizes revenue when its customer obtains control of promised goods or services in an amount that reflects the consideration which the Organization expects to be entitled to receive in exchange for those goods or services.

Revenue recognition – To determine revenue recognition for the arrangements the Organization determines are within the scope of ASU No. 2014-09, the Organization performs the following five steps: (1) identify the contract(s) with a customer, (2) identify the performance obligations in the contract, (3) determine the transaction price, (4) allocate the transaction price to the performance obligations in the contract and (5) recognize revenue when (or as) the entity satisfies a performance obligation.

Program revenue represents revenues related to the Mercury Containing Lights Product Stewardship Program. Revenue is recognized when participants report and remit the Environmental Handling Charges (EHCs) related to the sale of mercury-containing light bulbs as required by applicable provincial environmental legislation. Participants report and remit EHCs by the end of the month following the period the designated program mercury-containing light bulbs were sold by participants as required by the program's EHCs policy. There are no ongoing performance obligations the Organization must provide in order to recognize revenue; the Organization's performance obligations occur during the collection and processing of bulbs. There is no financing component. Therefore, revenue is recognized appropriately in the year the report is submitted, providing collection is reasonably assured.

Subsequent events – Subsequent events are events or transactions that occur after the statement of financial position date but before the financial statements are available to be issued. PCAPSI recognizes in the financial statements the effects of all subsequent events that provide additional evidence about conditions that existed at the date of the statement of financial position, including the estimates inherent in the process of preparing the financial statements. PCAPSI's financial statements do not recognize subsequent events that provide evidence about conditions that did not exist at the date of the statement of financial position but arose after the statement of financial position date and before the financial statements are available to be issued.

PCAPSI has evaluated subsequent events through April 15, 2021, which is the date the financial statements were available to be issued.

PCA Product Stewardship, Inc.

Notes to Financial Statements

Note 3 – Liquidity and Availability

Financial assets available for general expenditure, that is, without donor or other restrictions limiting their use, within one year of the statement of financial position date, comprise the following for the year ended December 31, 2020:

Cash and cash equivalents	\$ 1,452,291
Accounts receivable	<u>97,844</u>
	<u>\$ 1,550,135</u>

The Organization's cash flows have minimal seasonal variations during the year. The Organization typically maintains cash on hand equal to 3–6 months of operating expenses.

Note 4 – Property and Equipment

Property and equipment consisted of computers and software as of December 31, 2020. The computers and software are being amortized under the straight-line method over five years.

Note 5 – Related Party Transactions

PCAPSI is a wholly owned subsidiary of Product Care Association (PCA), a Canadian based company. PCA carries out similar operations in Canada and provides PCAPSI managerial services, such as maintaining financial books and records, creating financial reports, and other administrative duties for the Organization to carry out their mission. Fees paid to PCA totaled \$70,480 for the year ended December 31, 2020.

Note 6 – Concentrations

Concentrations of program operations – The Organization's program activities are concentrated in the state of Washington and could be impacted by legislative changes in the state.

Concentrations of credit risk – PCAPSI's cash and cash equivalents may subject them to concentrations of credit risk, and noninterest-bearing cash balances may exceed federally insured limits. The Organization has not experienced any losses in such accounts to date.

Note 7 – Risks and Uncertainties

In March 2020, the World Health Organization declared the novel coronavirus outbreak a public health emergency. Many of the long-term health effects of the virus remain unknown. The demand for light bulbs containing mercury in the state of Washington has been stable, and the Organization's program operations have not been significantly interrupted to date. The Organization will continue to monitor the situation closely, but given the uncertainty about the situation, the impact on future operations and the financial statements remains uncertain.

