



## Joint EITE Advisory Group meeting summary

Meeting notes for Thursday, May 1, 2025 | 9:30 a.m. – 11:00 a.m.

References: [Zoom recording](#); [Meeting presentation](#)

### 1. Welcome and introductions

- 23 out of 33 advisory group members attended the meeting.
- Ecology staff offered a welcome and advisory group members were introduced to the facilitation team from Ross Strategic and the Washington Department of Ecology (Ecology) staff.
- Advisory members were reminded about key provisions in the charter, including that the groups are not asked to reach consensus, they are not a decision-making body, participation does not imply endorsement for any actions taken by Ecology, and members should notify Ecology if they need to send a delegate to attend a meeting or if they change employment/affiliation.
- Ecology staff also reminded attendees that Ecology is dealing with market-sensitive information, and they will exercise due diligence to ensure all potentially market-influencing information is managed appropriately. Draft materials for the report will be released on the mornings of joint advisory group meetings, including May 29<sup>th</sup>, June 26<sup>th</sup>, and July 30<sup>th</sup> going forward. The materials will be posted on the [EITE webpage](#) and a notice will be sent to the [EITE email list](#).

### 2. Background and context for EITE allocation

- Ecology staff provided some background information on EITE allowance allocation and the report to the legislature. They also described the meeting format and feedback cycle for the advisory groups, including joint advisory meetings where Ecology will present draft materials, answer any clarifying questions, and record initial comments. The Industries and Policy Advisory groups will then meet the following week to discuss and provide additional feedback, which Ecology will integrate into draft materials ahead of the following meetings.
- Interim feedback on the presented documents is due on the Monday after each advisory group meeting (May 12<sup>th</sup> for this meeting) and the final deadline for feedback will be **September 3<sup>rd</sup>, 2025**.

### 3. Draft materials for discussion

- Ecology staff provided an overview of the two documents released the morning of this meeting, which contain literature review and analysis of policies related to EITE. They described the key findings and best practice policies for avoiding leakage and economic harm to businesses.
- Ecology also reviewed alternative methods for developing greenhouse gas benchmarks for EITE facilities and explained that the best available technology was used to develop the most stringent benchmarking for EITEs.
- References:
  - o [Document 1: Leakage policies](#)
  - o [Document 2: Benchmarking methods](#)

#### 4. Member questions or initial comments on draft materials

- *Question:* Where is output-based allocation currently being implemented?
  - *Ecology Response:* noted that output-based allocation is used in Québec, Canada (QC), but not in the European Union (EU). He added that the literature generally supports output-based allocation as a best practice approach based on experiences in other jurisdictions.
- *Question:* What mechanism does California use to fund the electricity credits for EITEs?
  - *Ecology Response:* can't speak to the specifics of the CA program, but will look into it.
- *Question:* Could a combination of best available (BAT) and reasonably available technology (RAT) be considered for benchmarking?
  - *Ecology Response:* responded that it depends on how those terms are defined, noting that while there's nuance between them—they are typically used in the air pollution context rather than for greenhouse gas emissions.
- *Question:* A member raised a question about carbon capture, noting that their organization is conducting a short feasibility study of this: What the incentive would be for reducing CO<sub>2</sub> through carbon capture if doing so results in no longer receiving credits to sell (because the facility no longer have covered emissions above 25,000 MT)? They highlighted the potential implications of this for facilities adopting proposed practices.
  - *Ecology Response:* acknowledged this is an important question and said it could be discussed further in the following week's separate advisory group meetings, and noted that facilities staying below the 25,000 MT emission thresholds may no longer be considered a covered entity, and not eligible for no cost allowances.
- *Question:* A member raised a point about product-based benchmarking, noting that they thought California had given a presentation on the topic and had existing benchmarks for sectors like refineries. Has Ecology considered how product-based benchmarks could be applied in Washington?
  - *Ecology Response:* responded that they have not assessed existing California benchmarks in detail but has reviewed what other jurisdictions have done, and explained that any work to apply product-based benchmarking in Washington would likely need to occur through a formal rulemaking process and is not within the current scope of the report, which is focused more broadly on whether benchmarks are appropriate at all.
- *Question:* What is the distinction between BAT and RAT (noting that Washington has an existing process for making that distinction)? Could it be leveraged here?
  - *Ecology Response:* acknowledged the point but did not provide a detailed response in this meeting.
- *Comment:* A member commented on product-based, sector-level baselines using the example of container glass in California. They explained that California used an industry average from 2006–2011 to determine product-specific benchmarks by averaging emissions across facilities. They noted uncertainty about how such benchmarks could be applied when accounting for fuel source variability.
  - *Ecology Response:* responded that there is optionality in how product-specific benchmarks can be developed and applied.
- *Comment:* A member raised concern about leakage and the broader policy implications of encouraging industrial electrification. They noted that if new, large industrial loads cannot be served by Bonneville Power Administration (BPA), industries will have to purchase electricity

on the open market, which must comply with clean energy standards and hedging requirements. They argued that this puts industries in a difficult position and raises broader questions about where affordable, clean energy will come from.

- o *Ecology Response*: responded that electricity system-related issues are expected to be covered in greater depth in future meetings, including at the June 26<sup>th</sup> joint meeting, and acknowledged the importance of considering electricity sector policies alongside policies targeting industrial emissions.

## 5. Next Steps

- Ecology staff reminded members and attendees how to submit comments using the [CCAETEIndustries@ecy.wa.gov](mailto:CCAETEIndustries@ecy.wa.gov) email and [Public Comment Form](#). Ecology noted that members are not required to provide written feedback, but the option is available.
- Interim feedback from members on the materials presented at the joint meeting is due the Monday following each advisory group meeting (May 12<sup>th</sup> for this meeting).
- The online public comment platform will close on September 3<sup>rd</sup>, 2025.
- Upcoming Meetings include:
  - o EITE Policy Advisory Group meeting: [May 7 from 9:00 a.m. to 11:00 a.m. \(meeting link\)](#)
  - o EITE Industries Advisory Group: [May 8 from 9:00 a.m. to 11:00 a.m. \(meeting link\)](#)

## 6. Public comment opportunity

- Facilitators made space for public comments and noted that members of the public may also provide written comments by email at [CCAETEIndustries@ecy.wa.gov](mailto:CCAETEIndustries@ecy.wa.gov).
- There were no public comments made during this meeting.

## Resources and Assistance

- Contact Adrian Young at [CCAETEIndustries@ecy.wa.gov](mailto:CCAETEIndustries@ecy.wa.gov)
- [EITE Industries Advisory Group webpage](#)
- [EITE Policy Advisory Group webpage](#)
- [Cap-and-Invest EITE webpage](#)
- [Public Comment Form](#)