

Washington Beverage Association

"Recommendations for Managing Plastic Packaging Waste in Washington:"
Comments from the Washington Beverage Association

We greatly appreciate the opportunity to engage with the Cascadia team as it developed this draft report: "Recommendations for Managing Plastic Waste in Washington," as well as the opportunity to now provide comments on the initial recommendations. First, we thank and applaud the state for exploring stronger recycling systems that can ultimately produce a circular economy for multiple materials and keep all recyclable materials ♦ including consumer goods packaging and paper ♦ from ending up in the environment. We commit to working with the state, lawmakers and stakeholders on building a system that serves Washington's citizens and its environment for many generations.

Today, we would like to focus our comments on the draft report's review of Extended Producer Responsibility and a Deposit Return System, two worthy pathways that will certainly recover more materials (including our bottles and cans), enhance their recycling and reduce their impact on the environment. We understand Cascadia's interest in exploring each of these systems. The perspective we offer is built upon the decades of experience our global companies have working with communities and recyclers around the world on successful programs to collect and recycle valuable plastic bottles, cans, and other materials.

First, our association and its members support a strong, efficient and convenient Extended Producer Responsibility (EPR) system built on core principles for successful operation. Extended Producer Responsibility provides the opportunity to create a more efficient, financially sustainable collection and processing system for recovering all recyclable materials used to package consumer goods and printed paper, enabling those materials to be turned into new products and not end up as waste in the environment. For our industry, that means collecting and recycling more of our 100% recyclable plastic bottles, aluminum cans, and glass containers so they can be remade into new ones. In Washington, EPR does so by building upon and strengthening the existing recycling infrastructure already in place throughout the state. This includes keeping recycling convenient to consumers by taking advantage of existing curbside recycling systems. A high functioning EPR system will have profound environmental benefits by promoting circularity, minimizing environmental waste, and reducing the carbon emissions associated with unnecessary materials production.

A successful EPR system in Washington needs to:

- o Have strong environmental outcomes that collect all recyclable materials in an efficient manner
- o Be convenient to consumers so they recycle consistently and properly
- o Be financially sustainable, allowing the private sector to operate and fund the system with government setting the scope of the program and providing oversight. The system must ensure that private sector fees paid into the system go solely toward operating and investing in the system and not other causes
- o Provide producer access to recovered material to ensure that producers have access to their recyclable materials for making new products and creating a closed loop, as well as ensuring this

material does not go to entities that are not financially contributing to operation of the system.

Our association and its members share your concern that too much plastic and other recyclable packaging ends up as waste in the environment and are committed to working with Washington policymakers to address this significant challenge. We believe an EPR system built upon these principles offers a strong approach for Washington to protect the environment and create a truly circular economy for these materials in a sustainable fashion. More importantly, we are eager to invest in a high functioning system guided by this experience.

An EPR system built on the principles above has proven successful elsewhere, but it has never been tried in America. This provides Washington a ground-breaking opportunity to become the first state in the US to create an EPR system for packaging and printed paper and show the path to a modern, financially sustainable recycling system that other states can follow.

Attached to this response is our more detailed position paper in support of EPR.

While we support EPR and believe it has many advantages, we appreciate that this study also looks at a Deposit Return System (DRS) for beverage containers. If built right and constructed on similar essential principles, a DRS can also improve the collection of more materials for recycling. Our experience in other countries shows that special caution must be taken when jurisdictions evaluate constructing both an EPR and DRS to avoid inefficiencies that could complicate efforts to achieve a truly circular economy.

With regards to recycled content standards, many ABA beverage manufacturers voluntarily use and have established global goals to use recycled PET content in their plastic bottles with the overall goal of reducing the amount of virgin plastic that is introduced into the environment. For this reason, we would be interested in engaging in conversations about how we can help design appropriate recycled content requirements for beverage containers in Washington in keeping with the already-aggressive goals set by our member companies. It is important, however, that we have a fully optimized system designed to fit local needs to collect and recycle more consumer packaging to support minimum content goals within any one state. This includes ensuring that beverage manufacturers participating in the system have first access to recycled materials (rPET) that can be used to meet minimum recycled content requirements.

Additionally, we fully recognize the current budget and resource challenges presented by the COVID-19 pandemic and are supportive of using interim steps to help create awareness and accountability of the packaging used in Washington to better inform long-term policy decisions.

The bottom line is that we want to work closely with state leaders, lawmakers and other stakeholders on building and participating in a stronger recycling system for Washington. It's a challenging endeavor, but a worthy and essential one. Again, we appreciate the opportunity to be part of this important work and look forward to further collaboration.