August 10, 2026

Kara Steward
Recycling Market Development Center
Washington Department of Ecology
kara.steward@ecy.wa.gov

Re: Deposit Return Study Comments

Dear Kara Steward:

The Washington Refuse and Recycling Association (WRRA) appreciates the opportunity to provide comments on the Department of Deposit Return System Engagement Study. WRRA is the longest-serving solid waste and recycling trade association on the West Coast, representing the private-sector solid waste, recycling, and composting industry throughout Washington State since 1947. Our members provide essential public health and environmental protection services, including the collection, transportation, and processing of municipal solid waste and source-separated recyclables and organics.

WRRA Members own and operate the material recovery facilities that process and sort the recyclables collected from communities throughout Washington every day. Waste Management operates three MRFs, Waste Connections operates two, and Republic Services and Recology also operate MRFs in King County. All of these MRFs were designed to sort and process beverage containers, some of the most valuable materials in the recycling stream. Washington's industry has invested for decades to sort and process beverage containers collected from convenient curbside recycling programs.

Below WRRA responds to the questions in the study. WRRA understands the limitations and scope of the study but also offers additional commentary on perspective that should be considered and addressed alongside implementation issues raised in the study.

I. Response to Questions in the DRS Engagement Study

1. Do the preliminary recommendations appropriately reflect the engagement findings and community priorities identified through this study?

- It is difficult to fully evaluate whether the preliminary recommendations reflect community priorities because the structure of the engagement process appears to have encouraged supportive responses toward a deposit return system rather than objectively evaluating whether such a system should be implemented.
- Anecdotally, WRRA received comments that many survey questions were framed in terms of identifying potential benefits or preferences for program design, while providing relatively few opportunities for participants to express concerns about the underlying policy or potential

negative impacts. As a result, the findings of how respondents would prefer a deposit return system to operate if implemented does not truly grapple with the public opinion question of whether Washington should adopt such a system in the first place.

2. Should any preliminary recommendations be modified, expanded, combined, or removed?

- The equity recommendations should be expanded to include affordability and financial equity. While the report appropriately considers transportation, language access, and differing community needs, it does not reckon with the financial impacts of requiring consumers to pay deposits upfront through an equity and affordability lens. A deposit return system is likely to have the greatest impact on households least able to absorb additional costs and may disproportionately affect overburdened communities.
- The report should also more directly address the challenges faced by individuals who rely on public transportation who may be required to transport large quantities of uncrushed containers in order to redeem deposits.

3. Are there additional considerations that should be reflected in future program planning or implementation?

- Future planning should give greater consideration to practical barriers faced by many Washington residents. These include individuals who rely on public transportation and may face significant challenges transporting beverage containers to redemption sites, as well as residents living in apartments, multifamily housing, or other residences with limited storage space for accumulating containers prior to redemption. These practical considerations affect both convenience and participation and should be incorporated into future planning.

4. Are there specific recommendations that may affect certain communities, geographic areas, or stakeholder groups differently?

- Yes. The report gives limited attention to the documented experiences of communities surrounding beverage redemption centers in other states. Oregon, in particular, has experienced well-publicized issues involving homelessness, scavenging, theft from curbside recycling, invasion of privacy, open-air drug use, and other neighborhood impacts associated with redemption sites that provide immediate cash refunds. These issues may disproportionately affect communities selected to host redemption centers and should be more thoroughly evaluated before recommendations are finalized.
    - Oregon's Bottle Bill crisis: How a landmark environmental law became entangled with Portland's drug problem OregonLive.com
    - 2 downtown Portland bottle return locations suspend service to fight fentanyl crisis, Oregonian

5. Are there additional implementation considerations that should be evaluated before final recommendations are developed?

- WRRA understands the scope of the study, but additional evaluation should be conducted regarding the overall cost-benefit relationship of a deposit return system. Specifically, the final report should examine the total cost to Washington residents, the expected increase in recycling attributable to the program, and whether those benefits justify the associated costs.
- The report should also evaluate who receives the primary economic benefit from the system, including whether the program primarily benefits beverage manufacturers, system administrators/operators, or consumers.

- The report should address why consumers must finance the deposit through upfront payments rather than requiring producers to bear the primary financial responsibility, particularly given the producer responsibility framework already established under the Recycling Reform Act.

II. General Comments on the Draft Recycling Refunds Engagement Study

WRRA understands the scope and limitations of the DRS Engagement Study, but offers the following broader commentary on more study and evaluation necessary while considering a Deposit Return System. The study does not evaluate whether a deposit return system would materially improve recycling outcomes beyond those expected under the Recycling Reform Act, whether the anticipated benefits justify the costs, whether unintended consequences could outweigh expected gains, whether consumers would participate at projected levels, or how existing recycling businesses would be affected.

A. Equity Discussion Focuses on Access but Should Include Affordability: The study gives comparatively little attention to the affordability implications of a deposit return system. It does not evaluate whether lower-income consumers would disproportionately finance deposits, and greater burdens transporting containers to redemption sites. The study defines equity primarily in terms of accessibility rather than the financial equity implications of the deposit itself.
B. Reduced Consumer Convenience: Although convenience is a central theme throughout the Engagement Study, the analysis focuses primarily on redemption site locations, site accessibility, and operating hours. It does not meaningfully evaluate whether requiring consumers to pay deposits and separately redeem beverage containers reduces convenience in the first instance. The study evaluates how consumers might redeem containers without considering whether the deposit system itself creates additional inconvenience and financial burdens.
C. Public Safety Concerns Receive Limited Analysis: Media reports from existing bottle bill states have documented concerns involving crime around redemption centers, fentanyl activity, scavenging, theft from curbside recycling containers, neighborhood impacts, and the need for additional on-site security. While the Engagement Study briefly identifies safety as one component of convenient redemption site design, it does not evaluate these documented experiences or analyze potential law enforcement impacts, neighborhood compatibility issues, security costs, challenges from existing deposit return systems.
D. Impacts on Existing Recycling Infrastructure: The Engagement Study recommends coordinating a future deposit return system with Washington's existing recycling infrastructure and minimizing duplication. However, it does not evaluate the potential consequences of removing aluminum and PET beverage containers from curbside recycling programs.
E. Environmental / Greenhouse Gas Impacts Are Not Evaluated: The Engagement Study does not evaluate the potential environmental tradeoffs associated with requiring millions of additional trips to redemption centers. Additional vehicle travel could increase traffic, congestion, fuel consumption, and greenhouse gas emissions compared to the scaling benefits delivered by Washington's existing curbside collection system.

Conclusion

Meaningful public engagement and equitable policymaking require transparency from beginning to end. Transparency means providing Washington residents with a complete understanding of both the potential benefits and the costs, tradeoffs, and unintended consequences of a deposit return system while the report simply asks how such a system should be implemented if adopted. It also means evaluating the impacts on consumers, existing recycling infrastructure, local governments, businesses, and communities alongside any anticipated recycling gains.

Washington has already enacted the Recycling Reform Act (RRA), a comprehensive extended producer responsibility framework designed to improve recycling outcomes through investments in the state's existing curbside collection and processing system. The RRA should be fully implemented, evaluated, and given the opportunity to achieve its intended results before policymakers consider layering on an additional deposit return system that could undermine those investments and create duplicative costs and infrastructure.

WRRA respectfully urges the Department to ensure that its final report reflects these broader considerations and recognizes that true equity and meaningful engagement are only possible when decision-makers and the public have a transparent, complete, and balanced assessment of all policy options. A transparent evaluation, coupled with successful implementation of the RRA, will provide the strongest foundation for achieving Washington's shared environmental and recycling goals.

Please contact Rod Whittaker, rod@wrra.org with any questions or follow-up.

Sincerely,

Brad Lovaas
Executive Director