

Public Comments on the ERG Engagement Study, August 2026

Sustainable Tri-Cities, WA

Introduction

Sustainable Tri-Cities supports Extended Producer Responsibility (EPR) and the goal of creating a stronger, more effective recycling system in Washington.

At the same time, the success of recycling reform depends on more than selecting a policy model. It depends on whether the system improves actual recycling outcomes, maintains public trust, is convenient for residents, and can be successfully implemented statewide. If these factors are not fully considered, even a well-intentioned policy could face challenges in adoption and effectiveness.

Our comments are intended to strengthen the proposed recycling reform by encouraging a broader evaluation of the available policy options before a preferred model is selected.

1. Individual redemption should not be assumed to be the best model.

The concept of individual container redemption dates back to the mid-20th century and was adopted in Oregon decades ago. However, it should not be assumed that this remains the optimal approach without evaluating it against today's circumstances, including changes in packaging, consumer behavior, municipal recycling systems, climate considerations, and available recycling technology.

Rather than asking, "*Should we copy Oregon?*", the more relevant question is:

"Given today's context, what system delivers the highest recovery rates, the best material quality, and the lowest overall cost to residents and producers?"

This evaluation should include alternatives where EPR funding reimburses municipalities or contracted recycling entities for verified collection and processing, rather than individual redemption. Examples include British Columbia's producer responsibility system and Oregon's Recycling Modernization Act.

2. The focus doesn't seem to be on the overall recycling goal.

The report spends a lot of time discussing impacts on overburdened communities. Those are important considerations, but at times they appear to become the main driver of the discussion instead of finding the best overall recycling system for Washington.

If those impacts are a key reason for recommending one option over another, it would be helpful to explain how they were weighed against other factors such as recycling performance, costs, convenience, and long-term effectiveness. I also wonder why Model 1, which relies on redemption at the nearest retailer, was not carried forward for further consideration.

3. Public distrust of plastic recycling is not addressed.

One of the biggest questions we hear from the public is, "*Is plastic really recycled?*" There is widespread skepticism about plastic recycling. In our area, even some solid waste professionals tell residents that "plastic is not recycled."

Since most beverage containers are now made from plastic, this issue cannot be ignored. If Washington asks residents to help fund a new recycling system, it also needs to clearly demonstrate that the plastic collected is actually being recycled into new products. Without rebuilding public confidence, it will be difficult to gain broad public support.

4. Some of the most important questions are considered "out of scope."

Both the Model Study and the Engagement Study identify several topics as being outside the scope of the analysis, including costs, effects on curbside recycling, and recycling markets. However, these are exactly the kinds of questions the public wants answered before supporting major recycling reform.

For example, the cost of operating a statewide redemption network is highly relevant. If approximately 20% of deposits are never redeemed, that could represent roughly \$112 million annually (based on 700 beverage containers per resident, 8 million residents, and a \$0.10 deposit). How would those unredeemed deposits be used, and to what extent would they offset the cost of operating the redemption system?

Likewise, the impact on existing curbside recycling is important. Many Washington residents already have curbside recycling that includes beverage containers. How would removing those materials affect municipal recycling programs?

Finally, changes to recycling markets should not be considered out of scope. The public should understand the likely impacts, including both the potential benefits of cleaner beverage containers and the possible effects of removing valuable materials from the existing recycling stream.

Without this information, the public cannot fully evaluate the tradeoffs between the different policy options.

5. Interpreting the engagement results.

The report acknowledges that the engagement results are not statistically representative of Washington residents. That is important to recognize when interpreting statements such as *"participants generally supported the proposed option."*

At the same time, many of the themes raised by participants reinforce the concerns above:

- **Convenience:** Participants repeatedly asked for a convenient system, suggesting that the impact on existing curbside recycling deserves more attention.
- **Transparency:** Participants wanted more transparency, highlighting the need to address public confidence in plastic recycling.
- **Effectiveness:** Participants emphasized an effective system, making costs and overall system performance relevant considerations.

Interestingly, many of the concerns raised by participants align with the points above, suggesting these issues deserve more attention before a preferred policy option is selected.

References

- [Oregon Department of Environmental Quality – Recycling Modernization Act](#)
- [Government of British Columbia – B.C.'s Extended Producer Responsibility \(EPR\) Recycling System](#)
- [Government of British Columbia – Advancing Recycling in B.C.](#)