

Snohomish County Solid Waste (Sage Schmalz)

TO: Department of Ecology, Recycling Refund Program Group – public comment forum

Thank you for the opportunity to comment on 3SHB 1607, the Recycling Refund Program. Snohomish County Solid Waste supports improved recycling outcomes statewide but the program, as currently drafted, presents operational, financial, and regulatory challenges for local governments.

Washington is in the midst of implementing two major statewide systems—the Organics Management Law and the Recycling Reform Act—and key rulemakings and infrastructure planning are underway. Introducing another large producer responsibility program now risks creating conflicting requirements, overlapping material categories, and confusion for producers, local governments, and recyclers. The program may also undermine investments made to support the Recycling Reform Act by removing high-value materials like aluminum and PET from curbside programs, reducing commodity value that helps offset recycling costs, potentially increasing costs for the County and ratepayers.

Operationally, Snohomish County Solid Waste does not have the facility capacity, staffing, or security resources to host redemption centers at our Transfer Stations or Drop Boxes. Other states' experiences show that redemption sites often create safety issues, illegal dumping, and complex cash-handling risks – burdens we are not equipped to absorb. Future versions of the program must give the County the option to decline operating redemption centers.

We also request clarity on the financial structure. Unclaimed deposits should support local solid waste systems by helping manage landfill diversion, stabilize recycling programs, and address impacts from redemption infrastructure. Additionally, requiring redemption centers in rural or low-income areas may place disproportionate pressure on those communities without guaranteeing equitable benefits.

In summary, while we support the goals of improved recycling and litter reduction, the Recycling Refund Program is not feasible for Snohomish County without major revisions. We encourage the Legislature to align the program with existing laws, protect investments made for the Recycling Reform Act, provide maximum local flexibility for hosting redemption sites, and dedicate unclaimed deposits to local solid waste programs. Strengthening current statewide systems before adding new obligations will create more stable and equitable outcomes.

Snohomish County Solid Waste welcomes continued discussions and is committed to providing data, operational insights, and local perspectives to help refine effective, workable policy solutions.