City of Vancouver, Washington (Matt Bucy)

Please see attached letter from the City of Vancouver Solid Waste Services. Please let me know if you have any questions.

Thank you,
Matt Bucy
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August 6, 2026

Thank you for the opportunity to comment on the Recycling Refund Community Engagement Study DRAFT Report (hereafter, "draft report") and Recycling Refunds Engagement Study DRAFT Technical Appendix (hereafter, "draft technical appendix"). The City of Vancouver Solid Waste Services offers the following comments on the draft report.

Upon review of the draft technical appendix, we have found noteworthy limitations in how the surveys were constructed that must be considered when evaluating the responses collected. General concerns are presented first, followed by specific concerns for specific survey questions. Questions for the survey team are bolded. Finally, we conclude with other considerations to be mindful of when evaluating a potential deposit-return system for beverage containers (hereafter, "bottle bill"), and the extent to which it could improve recycling access and outcomes compared to the expected improvements under the already-passed Recycling Reform Act (RRA).

General Survey Feedback

1. No information was provided to respondents on the Recycling Reform Act (RRA).

Per the draft technical appendix, the survey for each audience asked the respondents about their familiarity with a deposit-return system for beverage containers. The residential survey also provided respondents with information on how deposit-return systems typically work and their goals. However, no survey asked the respondent about their familiarity with the RRA, and no survey provided information about the RRA.

As stated in the text of the RRA, the intent of the legislature was that, if a deposit-return system for beverage containers were enacted, it would be harmonized with the RRA.[1] Whereas a bottle bill has not been passed into law by the legislature, the RRA has, and the Department of Ecology has begun implementing it. The RRA will increase residential access to curbside recycling, and increase recycling rates for paper and

[1] RCW 70A.208.250(1).

packaging products, including beverage containers. In assessing whether a bottle bill would increase the recycling rate for covered beverage containers, the potential increase should therefore be compared to the increase expected under the RRA.

As indicated in Figure 15 in the draft report, increased recycling was the potential outcome of a bottle bill most frequently identified by respondents. <u>However, no respondent was informed that the legislature has already enacted a law expected to make curbside recycling accessible to more communities and to increase recycling rates for covered beverage containers.</u> It is reasonable that many respondents, particularly those that responded to the residential survey, did not know about the RRA. Therefore, they could have approached this survey assuming the state had not recently taken action to improve recycling rates, and that a deposit-return system for beverage containers was the only opportunity available to do that. This could have caused the data to indicate a greater willingness to support a bottle bill, because respondents were comparing a bottle bill to status quo, instead of comparing a bottle bill to the improvements expected under the RRA.

The fact that familiarity with the RRA was not assessed, and that this survey was not presented with the context that the RRA has already been passed, is a significant limitation that must be considered when interpreting survey results.

2. Whether a respondent had access to curbside recycling likely impacted survey responses

It would have been valuable to analyze how survey responses differed among two populations: Washingtonians with access to curbside recycling and Washingtonians without access to curbside recycling.

For example, looking at the residential survey, Question B6b.6 asks “What factors would make it most difficult or inconvenient for you to return containers for a refund?” Of the respondents who provided their own response to “Other (please explain),” **how many respondents responded that returning containers for a refund would be inconvenient because they have access to curbside recycling?**

Similarly, Question B11 asks “How likely would you be to return containers for a refund, assuming a 10-cent refund, if this program becomes available?” It would have been valuable to see how the likelihood of returning containers differed between those with curbside recycling and those without it. Returning beverage containers will never be as convenient as curbside recycling, but it could be more convenient than dropping off recycling at a transfer station, depending on the location of the redemption site. Respondents without curbside recycling could seem more willing to return containers. However, it is important to note that more communities will gain access to curbside recycling as the Department of Ecology continues to implement the RRA. This information was not provided to survey respondents, which likely influenced survey results.

3. Several questions were phrased in a way that presupposed a bottle bill was desired by or beneficial to the respondent

Throughout the surveys, several questions were worded in a way that presupposed a bottle bill was a desired or beneficial program to the respondent. This includes qualifying questions about financial concerns with “if any” but not doing the same for financial benefits, explicitly asking about financial benefits but not financial concerns, or wording selectable answers as if there is an existing problem this new program would fix. This is especially limiting given that respondents were not asked about their familiarity with RRA specifically or paper and packaging extended producer responsibility (EPR) generally, and therefore respondents may not have known about existing or potential alternative recycling programs.

As stated at RCW 70A.208.240(2)(b), one of the purposes of the statewide engagement was to “assess consumer sentiment, awareness, and perceptions of a recycling refunds program.” Effectively evaluating sentiment, awareness, and perceptions requires collecting information on both perceived benefits and perceived concerns. To collect the best data, survey questions should be phrased to give equal opportunities to express both benefits and concerns. Please keep our question-specific feedback in mind when considering the responses received to those questions, and please consider how the data may be different had those questions been clarified or revised as suggested.

Question-specific feedback

Residential survey

4. Question B9: “In what ways, if any, could a recycling refunds [*sic*] program affect your household finances or provide financial value to your community? (Select up to three.)”

There were several listed answers a respondent could select. We would like to provide the following feedback and ask the bolded questions:

- "Helping reduce overall household costs if refunds are regularly collected." Even if a household were to regularly return the containers they purchased, they would only get back the per-container deposit they already paid, minus additional transportation and time costs to return the containers. **What was the intended meaning of this answer?**
- "Providing income opportunities for people who collect and return containers." In many municipalities, it is unlawful to remove recyclables from a container that is not your own.[2] It is also unsafe to do so, especially when retrieving recyclables from larger receptacles like dumpsters. It does not appear that this was disclosed to the respondents. It does not appear that it was clearly communicated that respondents would be limited to returning containers voluntarily provided to them or collected by litter pickup. Having this knowledge could have influenced their answer.
- **What did the survey authors mean by "Encouraging containers to be returned instead of thrown away (which may help reduce waste related costs over time)?"** Under a deposit-return system, each household would pay more than they do now when buying covered beverage containers, and they would then receive that deposited amount back if they returned the containers (minus transportation and time costs). **In what way would this lower their waste-related costs?**
- **One of the selectable answers was "No meaningful financial impact expected." Why was this not phrased as "No meaningful financial *benefit* expected?"** This question specifically asks about how a bottle bill could "provide financial value," and all other answers on the list are financial positives. The corresponding answer to question B8, regarding financial costs and concerns, is "No significant financial concerns," not "no significant financial impact." For any program, a program could have no meaningful financial benefit and still have a meaningful financial impact. It does not appear that residents had the option to explicitly state that they did not expect to receive a financial benefit from the program. Everyone who would pay a deposit would experience a financial impact. Not everyone who chooses to redeem their containers would view getting their deposit back as a financial *benefit*, because they are just recovering the amount they deposited, minus transportation and time costs.

[2] For example, see VMC 6.12.216

5. Question B11a: “What are the main reasons you would be likely to return containers for a refund? (Select your top three.)”

Why was there not a selectable response for “I would be unlikely to return containers for a refund?” Of the five selectable responses, four imply that the respondent is willing to return containers and the other is that they already recycle containers. No selectable response is applicable to someone who disposes of their containers in the garbage. **Of the respondents who selected “Other (please explain),” how many of those responses were “I would be unlikely to return containers?”** Even though the next question, B12, asks why a respondent would be unlikely to return containers, they should have been able to state that as a response to B11 and then provide details in B12.

Community Survey

6. Financial concerns, if any, vs. financial benefits

Question C6a uses the phrasing “...what financial costs or concerns, **if any**, would be most important for the communities you serve?” (emphasis added). However, Question C6b uses the phrasing “...what are the top potential benefits participation in a recycling refunds program could provide?” For the purposes of parallelism and to ensure neutrality in phrasing, potential benefits should have also been qualified with “if any.” The lack of qualifier presupposes the program will offer a financial benefit.

7. Question C7: “Based on your experience working with the communities you serve, what factors would make it most difficult or inconvenient for community members to return containers for a refund?”

Of the people who provided their own response to “Other (please explain),” how many answered that community members already have access to curbside recycling? This was not a selectable response but is a valuable factor to consider, especially given that more communities will gain access to curbside recycling as the RRA is implemented.

8. Question C8: “Based on your experience, what factors would make community members more likely to return beverage containers for a refund?”

Of the people who provided their own response to “Other (please explain),” how many answered “members in my community would not be likely to return beverage containers?” This was not a selectable response.

9. Question C9: “Thinking about the communities you serve, how far would community members be willing to travel to a redemption site location and still consider it convenient?”

There was not an option for a respondent to type their own response. Of the list from which a respondent could select an answer, there was not an option for “not willing to travel.” This presupposes community willingness to participate. Respondents should have been provided the option to select “Not willing to travel.”

City and County Surveys

10. Questions D1a-7d “Government staff workload or administrative effort” and Question D1b-6d “County administrative workload.”

It would have been helpful to allow cities and counties to state the anticipated impact to different programs in their city or county. City and county responses were likely submitted by their solid waste programs. However, a bottle bill would impact programs beyond their own. For example, city grounds crews would see increased workload because they would spend more time cleaning litter around public garbage receptacles that had been scavenged for bottles and cans. Similarly, the planning/permitting department would see increased workload associated with siting and permitting redemption sites. Allowing cities and counties to parse out anticipated workload by program would have provided more granular data.

11. Question D1a-8: “Which of the following would you consider to be the top benefits of a recycling refunds program for your city or local jurisdiction? (Select your top five.)” Question D1a-9: “What are the top potential challenges your jurisdiction might face if a recycling refunds program were implemented in Washington? (Select your top five).”

There was not a question explicitly asking for top concerns about a bottle bill. Cities were asked about potential benefits of a bottle bill (D1a-8; D1b-7) and potential challenges to implementing a bottle bill (D1a-9; D1b-9), but not about potential concerns.

12. Question D1b-7: "What are the top potential benefits that a recycling refunds program could provide at the county or regional level? (Select your top three.)" Question D1b-8: "D1b-8. What potential challenges might your county face if a recycling refunds program were implemented? (Select your top five.)"

There was not a question explicitly asking for top concerns about a bottle bill. Counties were asked about potential benefits of a bottle bill (D1b-7) and potential challenges to implementing a bottle bill (D1b-9), but not about potential concerns.

13. County contracts

Cities were asked to indicate how they believed a bottle bill would impact existing recycling or solid waste contracts (D1a-7e). There was not an equivalent question for counties. While garbage may be handled through a certificate issued by the Washington Utilities and Transportation Commission, a county could still have a recycling contract with a hauler and that contract could be impacted by a bottle bill. This question should have also been asked of counties.

Recycling System Operators

14. Question D2-9: "What are the top potential financial benefits that a recycling refunds program could provide for your organization?"

There was not a question explicitly asking for top financial concerns. Some financial concerns were included in the list of possible answers to Question D2-11, in addition to non-financial concerns. For the purposes of parallelism, it would have been helpful to separately ask about financial vs. non-financial concerns.

15. Question D2-10: "Beyond financial considerations, what other top benefits could a recycling refunds program provide?"

The phrasing of this question presupposes that recycling system operators will receive financial benefits under this program. This is particularly problematic for this audience, given that aluminum cans are a valuable commodity that could become less prevalent in the curbside stream if a bottle bill were implemented. This question should have been phrased as "What non-financial benefits could a recycling refunds program provide, if any?"

Two of the possible answers on the list are "clearer system roles and responsibilities" and "Improved coordination across the recycling system."

- "Clearer system roles and responsibilities" assumes that, currently, system roles and responsibilities need to be clarified. This potential answer is confusing, given that there is no deposit-return system for beverage containers in Washington, and therefore no redemption sites or deposit-return system Producer Responsibility Organization (PRO). Therefore, there is no system. How can roles and responsibilities in a system become clearer when the system itself is nonexistent? **Please clarify the intended meaning of this answer.**
- "Improved coordination across the recycling system." Like above, this implies that coordination in the recycling system needs to be improved. Given that a bottle bill would introduce a new party to the system and a new network of recycling sites, it is unclear how that newness would improve existing coordination between existing participants in the existing system. **Please clarify the intended meaning of this answer.**

The other two potential listed answers, other than "Not sure" and "No significant non-financial benefits anticipated," do not seem specific to recycling operators:

- "Environmental or litter reduction benefits." For many recycling operators, litter reduction is not their primary service. Receiving fewer bottles and cans from the curbside stream would not be an environmental or litter reduction benefit.
- "Improved public understanding of recycling." For a recycling operator, it is important that the public knows *what they can recycle through that operator's system.* It is not necessarily relevant to the recycling system operator whether the public knows of an alternative system they can use.

Respondents had the option to enter their own response via "Other (please specify)." **Were there any commonalities or trends in those responses?** It is unclear how relevant the listed possible answers are to recycling system operators.

Retailers and potential site hosts

16. Question D3-13: “What are the top potential benefits that participating in a recycling refunds program could provide your organization? (Select your top three.)”

We appreciated that the list of selectable answers for this question was very specific to retailers and potential site hosts. If Question D2-10 were to be revised in the future, we encourage the selectable responses to be to this level of specificity.

However, the survey does not have a question specifically asking retailers and potential site hosts for their top concerns about participating in the program. While there was an earlier question asking about factors that would influence willingness to participate (D3-9), that is not the same thing as explicitly asking for their concerns. If a bottle bill were implemented, co-location of redemption sites with retail facilities could provide a convenient return option. However, it is important to know the concerns that could prevent a retail site from wanting to host a redemption site, and it would have been valuable to explicitly solicit those concerns in this survey.

Producer survey

17. Question D4-9: “What are the top potential benefits participating in a recycling refunds program could offer to your organization? (Select your top five.)”

Producers are explicitly asked about the potential benefits of the program but not explicitly asked for their potential concerns. We have the following feedback on the selectable answers:

- “Greater consistency across recycling systems.” Most states do not have a bottle bill. Bottle bill redemption values can vary across states, and different states can have different PROs for their bottle bill. **What was the intended meaning of this answer?**
- “Opportunities for innovation in packaging or logistics.” **Is this alluding to eco-modulated fees? How many states have this as a component of their bottle bills?**
- “Reduced litter or environmental impacts associated with beverage containers.” This is not an outcome specific to this group of respondents (beverage producers). Litter reduction and clean-up is not one of their core functions.

Concluding Remarks

On page 7, the draft report states:

> "The Engagement Study did not evaluate implementation costs, funding mechanisms, engineering or infrastructure plans, or whether Washington should adopt a recycling refunds program. Nevertheless, participants consistently emphasized that implementation costs and funding approaches would be important considerations if a recycling refunds program were pursued. Participants also frequently raised other topics outside the study's scope, including impacts on existing recycling services, interactions with producer responsibility programs, infrastructure needs, workforce considerations, and overall recycling system performance. Although these topics were not evaluated directly, they informed the key themes, validation findings, and draft recommendations presented in this report."

While some of these concerns may not have been within the scope of the study as stated in RCW 70A.208.240, they are crucial factors to consider in deciding whether a bottle bill would increase recycling rates and access. For example, in the 2023 Washington Recycle, Reuse, and Source Reduction Target Study and Community Input Process Report to the Washington State Legislature, changes to recycling rates relative to a 2021 baseline were modeled under several scenarios, including a scenario with an extended producer responsibility law (which Washington now has through RRA), and a scenario in which Washington has an extended producer responsibility law and a bottle bill. Per that model, from a baseline overall recycling rate of 40%, the overall recycling rate would increase to 66% in 2032 with an EPR law or to 70% in 2032 with an EPR law and a bottle bill. Under this model, adding a bottle bill would only increase the overall recycling rate by 4% compared to the overall recycling rate expected by 2032 under the RRA. The modeled changes to recycling rates per material are shown in the table below. One explanation the 2023 report provided for the high increase in the glass recycling rate is that "glass includes the largest proportion of beverage containers out of all the material categories, so the [bottle bill] therefore impacts the total glass category the most."[3]

[3] 2023 Washington Recycle, Reuse, and Source Reduction Target Study and Community Input Process Report to the Washington State Legislature, page 57.

Material	2021 statewide recycling rate	Projected 2032 statewide recycling rate under RRA alone	Projected 2032 statewide recycling rate under RRA and a bottle bill	Change in projected statewide recycling rate: RRA and bottle bill vs RRA alone
Overall	40%	66%	70%	+4%
Aluminum	45%	69%	78%	+9%
Steel	35%	65%	65%	No change
Glass	31%	60%	86%	+26%

Furthermore, Figure 15 in the draft report indicates that 57% of respondents believed a bottle bill would increase recycling. However, the draft technical appendix and draft report indicate that:

- 66% of respondents currently recycle their bottles and cans curbside and 16% currently recycle their bottles and cans through their apartment's recycling dumpster (Figure E-4),
- 60% of respondents consider returning bottles and cans less convenient than curbside recycling (Figure E-25), and
- Only 58% of respondents would be very likely to participate in a bottle bill system (Figure 15).

<u>Therefore, the data show that most respondents are already recycling their bottles and cans, would prefer to continue to recycle them through their existing curbside system, and would not be very likely to return them if a bottle bill were implemented</u>. The draft report should be revised to connect the perceived benefits of the system reported by respondents with respondent-provided data on their own current behaviors. Modest increases in recovery rates, fewer people being very likely to participate than recycle through the existing system, and the unclear extent to which the public knows about RRA and how that will improve the recycling system should all be considered when interpreting the results of the engagement study.

Finally, it appears that not all respondents responded to all questions. For example, in the draft technical appendix, Figure 19 states that there were 20 respondents to the recycling system operator survey, while Table B-2 in the draft report states there were 41 responses to that survey. Similar discrepancies exist between Figure 19 and Table B-2 for local government survey responses (48 in Figure 19, 40 in Table B-2) and community-based organizations (31 in Figure 19, 33 in Table B-2). **Please publish the raw results from each survey, including total number of respondents, as well as a question-by-question breakdown of the responses received and a list of the open-ended responses received.**

The City of Vancouver Solid Waste Services responded to the survey. Several times in our survey response we extended the opportunity to sit down with the survey team for an interview. We were not contacted for an interview. Being a community that borders a state with an existing bottle bill, we have unique lived experience that could inform the survey's stated goals of determining how a bottle bill could work in Washington. We remain willing to be interviewed for this study if that is still a possibility.

If you have any questions about these comments, please contact me at 360-947-1268 or Will.Elder@cityofvancouver.us.

Sincerely,

Will Elder

Environmental Services Manager

Cc: Bethanie Velasco, Amanda Zodrow; Clark County

Josh Brown, Waste Connections