

The Recycled Materials Association (Cory Bloom)



Recycled Materials
Association

August 4, 2026

Washington Department of Ecology Solid Waste Management Program
P.O. Box 47600
Olympia, WA 98504 - 7600

Re: Feedback on Washington State's Recycling Refunds Study

To Whom It May Concern,

The Recycled Materials Association (ReMA) appreciates the opportunity to comment on the Recycling Refund Community Engagement Study. The Recycled Materials Association (ReMA) represents more than 1,700 companies in over 40 countries that transform end-of-life products into essential, high-quality raw materials the world relies on every day. Across metals, paper, plastics, glass, textiles, rubber, and electronics, ReMA members safely and efficiently process recycled materials into the building blocks that power manufacturing, strengthen and secure global supply chains, and conserve natural resources. In the United States alone, our members deliver \$183 billion in economic activity each year and contribute 603,000 jobs in communities nationwide.

ReMA appreciates the opportunity to provide input to the Washington Department of Ecology on its study regarding a potential Recycling Refunds Program.

Legislative Text:

ReMA is pleased to see outreach to recycling system operators as part of the community engagement process and offers to put the selected consultant in touch with ReMA members who operate recycling systems within Washington State.

Section 1.0 – Purpose and Study Overview:

ReMA appreciates Ecology's recognition that the engagement study is intended to evaluate convenience, accessibility, equity, and implementation considerations rather than advocate for a particular policy outcome. ReMA also appreciates the reports acknowledgement that additional analyses regarding operational impacts, costs, and broader policy considerations would be necessary before the implementation of a recycling refunds program.

Ecology should consider future analyses to evaluate the impacts on the existing recycling system, including municipal curbside programs, material recovery facilities, processors, brokers, and end markets. These stakeholders represent key actors in Washington state's recycling infrastructure and should remain a core part of information gathering and program planning.

Section 1.2 – Overview of the Model Study

As Ecology continues evaluating a potential recycling refunds program, ReMA recommends that future analyses examine:

- Financial impacts on municipal programs and MRF operations
- Operational impacts on processors and end markets
- The end destination of beverage containers collected through the redemption network, ensuring continuation of the competitive marketplace for recycled materials

Section 2.2 – Engagement Audiences

As Ecology continues refining recommendations, ReMA encourages ongoing engagement with recyclers, processors, brokers, and manufacturers that consume recycled materials. These stakeholders possess practical operational expertise regarding collection systems, commodity markets, material quality, and end-market demand that will be critical to designing an effective recycling refunds program.

Section 3.1 Program Understanding, Access, Convenience, and Participation

ReMA agrees that convenience extends beyond travel distance and includes operating hours, accessibility, reliability, safety, and integration into residents' daily routines. ReMA encourages Ecology to consider the effects that a redemption system would have on existing collection programs to avoid reducing participation in established recycling systems.

Section 3.3 Operational Considerations and Conditions for Success

ReMA recommends that Ecology consider the following topics for the implementation of a successful redemption program:

- Long-term financial sustainability
- Operational impacts on existing recyclers
- Material flow changes
- Impacts on municipal recycling funding
- Workforce and infrastructure needs
- Effects on domestic recycled materials

Section 6.0 Assessment and Validation of the Model Study

ReMA is glad to see the report add Recommendation #7: *Evaluate Implementation Costs, Funding, and System Impacts* to the model study. A recycling refunds program would not exist in a vacuum but would have spillover impacts to curbside recycling programs, private metal recyclers, event recycling programs, public drop-off centers, and more. Fully understanding these ripple effects and the financial impacts of system implementation and of shifting material volumes from other systems will be critical as the state continues its consideration of this program.

7.2 Redemption Site Placement and Management

ReMA supports the recommendation to coordinate redemption sites with Washington's existing recycling system, and would underscore participants' emphasis that the program should not compete with existing recycling infrastructure.

Whenever practical, implementation should leverage existing recycling infrastructure and private-sector expertise to minimize duplication, reduce unnecessary costs or negative impacts to established recyclers, and improve overall system efficiency.

7.4 Planning, Reporting, and Accountability

ReMA agrees that clear governance, accountability, and defined stakeholder responsibilities are essential to the successful implementation of any recycling refunds program. ReMA encourages continued engagement with recyclers and other recycling system participants to ensure reporting requirements are practical, avoid unnecessary administrative burdens, and protect confidential business information.

As Ecology develops future reporting requirements, ReMA encourages the Department to minimize unnecessary administrative burdens by leveraging existing reporting frameworks where practical. ReMA also encourages Ecology to ensure that any reporting requirements appropriately protect confidential business information and collect only information necessary to administer and evaluate the program.

ReMA encourages Ecology to view [ReMA's position on beverage container deposit legislation](#) which advocates for beverage container deposit initiatives to be carefully crafted to prevent negative repercussions on the current recycling ecosystems and consumers.

Justin Short
AVP of State Affairs
Recycled Materials Association (ReMA)
1250 H Street NW, Suite 400
Washington, DC 20005
(202) 662-8508
JShort@RecycledMaterials.org

Natalie Messer Betts
VP, Sustainability & Materials Systems
Recycled Materials Association (ReMA)
(202) 662-8551
NBetts@RecycledMaterials.org

Cory Bloom
Manager, State and Local Government Relations
Recycled Materials Association (ReMA)
(202) 662-8546
CBloom@RecycledMaterials.org