August 10, 2026

Washington Department of Ecology - Recycling Development Center

Re: Washington Department of Ecology's Draft Recycling Refund Community Engagement Study

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Dear Department of Ecology Staff:

The Glass Packaging Institute (GPI) offers the following comments on Washington's Department of Ecology's (Department) Draft Recycling Refund Community Engagement Study, which summarizes statewide community engagement efforts to understand potential impacts of implementing a deposit return system (DRS).

GPI is the North American trade association for the glass food and beverage manufacturing companies, glass recycling processors, raw material providers, and other supply chain partners within the industry. GPI and its members work closely with local and state governments throughout the country on issues surrounding sustainability, recycling, packaging manufacturing, and energy use. We are working nationally and, in most states, to improve the glass recycling infrastructure and system to help achieve a 50 percent consumer glass recycling rate, and advance policies that further that goal.

GPI is also a member of the Coalition for High Performance Recycling (CHPR), which represents a diverse group of consumer brands, environmental nonprofits, material manufacturers, packaging suppliers, and trade associations united in a shared mission to improve recycling systems across the country. GPI and CHPR colleagues appreciate the opportunity to provide the following comments to the Department for consideration.

Convenience

A dominant theme throughout stakeholder comments and reflected in the findings and recommendations is the importance of convenience, measured in multiple ways. Common refrains for convenience measurements were travel times, wait times, language accessibility, and ability to integrate returns into existing routines.

CHPR advocates for a centralized, producer stewardship model of recycling refunds that supports system optimization to maximize consumer convenience. We support setting convenience criteria in statute, for which a producer responsibility organization must submit a plan outlining how they will deliver a convenience system and seek approval from the Department.

CHPR emphasizes that a variety of collection methods should be established by the PRO to meet the unique needs of consumers and support all aspects of convenience. While some recycling refund programs rely solely on a return in retail requirement to provide return opportunities, CHPR believes the PRO should be empowered to outline convenience in the program plan and highlighting multiple collection locations and methods, including bulk sorting equipment in depots, bag drop kiosks, valet pick-up from peoples' homes, etc.

Transparency and Fiduciary Responsibility

Washington residents expressed their desire for a financially sustainable program that is cost effective and transparent in how funds are used. They emphasized the need for continuing education, outreach, and partnerships.

CHPR supports a recycling refunds model in which unredeemed deposits remain with the PRO and are reinvested to improve the recycling refunds system through education and outreach, investing in existing and new redemption facilities and technologies, and other requirements outlined in their program plan, as approved by the Department of Ecology.

Governance

The initial Recycling Refunds model study did not include principles of governance, implementation, operations, and long-term management, nor system integration.

These were considerations CHPR raised in our interview with study consultants and many of our recommendations and reflected in the draft engagement study report. We appreciate the recommendations to consider establishing effective governance and clear roles, ensuring operational feasibility and cost effectiveness, and planning for administration, enforcement, and continuous improvement.

Integration with Existing Law

The draft report notes that a recycling refunds program would need to be integrated into the state's existing recycling system, including coordination with implementation of the Recycling Reform Act. The report notes study respondents citing hardships, including the loss of valuable material, impacts on contracts, capital and infrastructure costs, and operations complexity.

CHPR notes that while there would be some adjustments and potential challenges in implementing a recycling refunds system, there are significant benefits to be gained from the program. Implementing a recycling refunds system in the next one to two years would allow for integration with the Recycling Reform Act, planning shared infrastructure and coordination between PROs from the outset. CHPR recommends this important nuance be reflected in the final report.

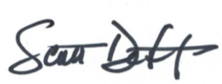
The report primarily notes environmental benefits such as decreased litter. Additionally, recycling yields lower greenhouse gas emissions compared to extracting and producing new materials. Recycling also supports local jobs and enables a circular economy.

Specific to Glass

Finally, we would like to add a couple points that may not have been fully realized in the report but that are important reminders of the benefits of a recycling refunds program (deposit return) in Washington as it relates to glass and the Recycling Reform Act.

- Glass is primary package format, directly containing the product, and over 70 percent of glass containers are used with beverages. Putting the vast majority of beverages in a DRS system will create a more consistent glass recycling system across the state.
- Consumers know and trust glass as recyclable and want to recycle glass – our data shows a consistent desire above 80 percent for consumer interest in recycling glass.
- DRS/Recycling Refund programs usually double and often can triple the glass recycling rate as compared to curbside recycling, and can usually create four times more yield of high quality glass cullet compared to commingled curbside due to the high contamination rate of commingled material recovery facility (MRF) glass streams.
- DRS glass has higher commodity value and can travel farther with a larger number of glass processing options at lower processing costs.
- The strong presence of the wine industry in Washington and the PNW creates strong opportunities to benefit the state wine industry with better glass recycling.
- Glass is tailor made for reuse and refill programs, and the DRS benefits that possibility greatly due to being able to keep the reusable bottle intact upon recovery.
- Stronger possibilities for reusable bottle programs for wine, beer, and mineral water, especially in the hospitality setting, are enhanced with a DRS program that could work across state borders with Oregon.

Sincerely,



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