

KC SWD Comments

- We commend Ecology’s efforts to prioritize equity, accessibility, and community perspectives in the development of a beverage container deposit return system (DRS) in Washington State.
- While the following comments may relate to aspects that are considered out of the scope of the Recycling Refund Study, they relate to *“potential statewide impacts of a recycling refunds program”* and should have been considered to *“develop recommendations to ensure that a recycling refunds program is [...] responsive to community needs across all regions of the state.”*
 - If it is not convenient to redeem beverage containers, consumers would end up paying more for beverages. This would have a disproportionate impact on low-income, overburdened and underserved communities. This should be clearly stated for why equitable access is important.
 - The study overlooks “inconveniencies” that might arise with a DRS compared to the current curbside recycling system, e.g.:
 - Dumpster diving in bins to retrieve redeemable bottles and cans that may leave a mess and create litter in neighborhoods.
 - Redemption sites in disadvantaged, underserved, and overburdened communities may become more frequented by those experiencing homelessness resulting in some residents feeling unsafe or leading to increased litter.
 - The study should provide data, consult with community members, and address any issue that may arise from such “inconveniences.”
 - Safety is listed as a concern to participants. This is an important aspect of accessibility, while at the same time we have concerns of how surveillance systems such as Flock Safety that might be misused to endanger some community members – particularly immigrants.
 - Some of the recommendations relate to transparency and accountability of the program. It is important that all deposits collected under the program go to funding the program and continuous improvement – or be returned to communities, i.e., no funds paid by consumers should be diverted to producers.

Response to the specific questions for Public Review:

- *Do the preliminary recommendations appropriately reflect the engagement findings and community priorities identified through this study?*
 - Yes
- *Should any preliminary recommendations be modified, expanded, combined, or removed?*
 - Yes, modified and / or expanded - see above
- *Are there additional considerations that should be reflected in future program planning or implementation?*
 - Yes:

- How does the Recycling Refund Program impact individuals with disabilities (mental, intellectual or sensory), e.g., visually impaired or neuro-divergent individuals?
 - Compensation and benefits (e.g., living wages) for those that work as part of the Program
 - Worker conditions and rights (e.g., ability to unionize) in the organizations that are part of the Program
 - Opportunities within the Program for women, minorities, veterans, small businesses, and independent operators, including policies and practices that promote diversity and inclusion (e.g., equal pay and opportunities)
 - Impacts on small, independent grocery stores
- *Are there specific recommendations that may affect certain communities, geographic areas, or groups differently?*
 - Recommendations in relation to specific impacted groups:
 - Individuals with disabilities (mental, intellectual or sensory)
 - Workers
 - Small independent grocery stores, business owners and operators – particularly women, minorities, and veterans
 - Individuals experiencing homelessness and others that might become canners (people who collect cans and bottles for income)
- *Are there additional implementation considerations that should be evaluated before final recommendations are developed?*
 - Yes:
 - Addressing issues related to concerns about dumpster diving for redeemable bottles and cans; safety, privacy, and litter around redemption sites, and impacts on workers and small / women / minority / veteran owned or operated businesses.
 - Proposing strategies and solutions that might avoid or mitigate some of the issues.