

Coalition for High Performance Recycling (Allison Kustic)

Please see attached document for comments from the Coalition for High Performance Recycling (CHPR)

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

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, which 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

WA 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 1-2 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.

In addition to integration with the Recycling Reform Act, a recycling refunds system has an important role to play in supporting the state's existing recycled content mandates for plastic. Washington law requires 25% recycled plastic in beverage

containers. Food-contact packaging like beverage containers can only use recycled plastic from an extremely clean recycling stream, that produced by recycling refund programs. Beverage containers sold in Washington must source material out of state to meet the state's own law, but a recycling refund program could change that.

Contact

For questions or additional information, please contact the Coalition for High Performance Recycling at info@chprecycling.org