

Lautenbach Recycling (Carolyn Moulton)



Thank you for the opportunity to comment on the Department of Ecology's Deposit Return System Model Study and Community Engagement Study.

We respectfully oppose the creation of a statewide recycling refund program.

Washington is currently implementing the Recycling Reform Act (RRA), one of the most significant changes to the state's recycling system in decades. Before introducing another major recycling policy, the state should fully implement and evaluate the RRA.

Major questions remain about the costs of a deposit return system: its interaction with our emerging RRA framework, impacts on local recycling programs and material recovery facilities, and long-term administrative and operational expenses. Implementing multiple reforms simultaneously will make it difficult to measure outcomes and identify the unintended consequences of each. Additionally, states implementing new Extended Producer Responsibility (EPR) programs currently face significant legal, administrative, and stakeholder challenges.

Consumers will face additional costs and inconveniences under a deposit return system, including upfront deposits, travel to redemption locations, storage of containers, and time spent redeeming deposits. Education is another concern. Significant changes to recycling rules, collection programs, accepted materials, and deposit requirements occurring simultaneously could create confusion rather than participation.

Washington should take a deliberate, step-by-step approach: implement the RRA, establish baseline performance metrics, evaluate the results, and then determine whether additional measures are necessary.

Thank you for considering our comments.

