

Molly Pfaffenroth

August 10, 2026

Department of Ecology
recyclingreform@ecy.wa.gov

RE: Comments Preliminary Draft Report – Recycling Refund Engagement Study

Thank you for the opportunity to provide feedback on the Recycling Refund Community Engagement Study. The Washington Food Industry Association (WFIA) represents independent grocers, convenience stores, distributors and suppliers throughout Washington state. We have been actively engaged in conversations regarding a deposit return system (DRS) for the last several years and appreciate the requirement to complete a more thorough analysis as future legislation is considered.

Overall, the engagement study provides a comprehensive summary of community engagement. The report is clear and attempts to carefully capture all the comments made by stakeholders while creating overarching themes and patterns. However, the study is flawed from the outset due to the decision to base the questions off the model study conducted in 2025. The questions, and therefore the responses, assume a DRS is active in Washington. If a DRS is automatically considered active, respondents have little opportunity to make the statement that a DRS system is not wanted. Additionally, our read of the engagement study request by the Legislature does not require that the model study is used to influence the engagement study.

As mentioned, the original study is flawed, which creates significant concern about its use in generating feedback for the community engagement questionnaire. The model study fails to consider the current curbside system, fails to evaluate or estimate the cost of a DRS for consumers, and does not generate a cost for drop sites. The study also proposes a network of drop sites over 5 times greater than Oregon's site network, which has operated a DRS for 40+ years.

Using the model study to inform the community engagement study creates issues in two specific categories: convenience and system integration. The study claims "convenience emerged as one of the strongest and most consistent findings across engagement activities." We believe this theme is consistent based on the assumptions in the model study. It is natural for consumers to want a convenient method of recycling and receiving their refunds. Convenience is an incentive to participate in the program. However, the most convenient way to recycle is simple: utilize a curbside recycling system. This option is not included in the study because of the hypothetical scenario outline in the model.

In the same vein, the request for system integration is well captured and repeated throughout the report but fails to address WFIA's comments. Our request for system integration is to consider what happens to the current system, rather than how drop sites complement recycling and waste management. The study does not contemplate if respondents would opt for curbside instead of a drop site, regardless of convenience. Interestingly, the study states, "Across engagement methods, participants also emphasized that financial incentives alone are unlikely to drive participation if redemption opportunities are inconvenient or difficult to use." While we wholeheartedly agree, we

also argue that the most convenient method for recycling of any type is curbside recycling, but this option is omitted from the discussion.

Additionally, when addressing convenience, mobile sites and return vending machines are both listed as potential options for future drop sites. Does the waste management system in most cities and counties not count as a mobile drop site? Would local governments be expected to add a new fleet of additional trucks that provide the same function? Reverse vending machines may be appealing to customers who want instant gratification for their returns, but they have proven to be a public safety hazard for consumers and hosts. Offering either of these options as forms of convenience does not capture the challenges presented by sites like this.

Finally, the conclusion is incredibly misleading as it claims the "findings support the general direction of the model study and its recommended scenarios." Our read of this type of statement is that stakeholders are supportive of moving forward with a DRS in Washington. This could not be further from the truth. The overall analysis fails to address the very real concerns we shared about using the model study to produce the engagement study. We respectfully request an acknowledgement of these concerns in the report.

We look forward to continuing the dialogue on this topic and being a resource for critical feedback.

Sincerely,

Molly Pfaffenroth
Government Affairs Director
Washington Food Industry Association



Washington Food
Industry Association

Supporting and representing the neighborhood grocers, convenience and specialty retail stores, suppliers and distributors that make up the fabric of our communities in Washington State.

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