October 30, 2026

Washington State Department of Ecology
300 Desmond Drive SE
Lacey, Washington 98503

RE: Recycling Reform Act Draft Preliminary Needs Assessment

Dear Ecology Team,

Thank you for the opportunity to submit comments on behalf of Upstream regarding the draft preliminary needs assessment for the Recycling Reform Act (RRA). Upstream is a US-based nonprofit and leading change agency for the reuse movement in the US and Canada working towards normalizing reuse, growing and supporting the reuse industry, and creating an enabling policy environment for reuse.

We strongly support the goals of the RRA and recognize the considerable effort that has gone into compiling the draft preliminary needs assessment. We appreciate that the report expanded the scope of data collection beyond recycling and organics to include an analysis of reuse and refill programs and infrastructure. A thorough understanding of Washington's existing reuse and refill programs and infrastructure is essential to assisting a more comprehensive evaluation in the full needs assessment. We believe the draft preliminary needs assessment is still missing important clarification, information, and recommendations regarding reuse and refill. Please see our comments outlined in detail below.

Clearly Define and Distinguish Different Refill and Reuse Models:

Reuse and refill systems are commonly divided into four models[1]:

- Refill at home: users refill their reusable containers at home
- Refill on the go: users refill their containers away from home
- Return from home: packaging is picked up from home by a pickup service
- Return on the go: users return the packaging at a store or drop-off point

Section 9.3.4 has identified how each of these models operate in Washington; however, the report does not clearly distinguish between them. **Please revise Section 9.3.4 to properly and clearly differentiate between refill at home, refill on the go, return from home, and return on the go, addressing each in a**

[1] Ellen MacArthur Foundation. "Reusable Packaging Business Models." Ellenmacarthurfoundation.org, March 3, 2023. https://www.ellenmacarthurfoundation.org/reusable-packaging-business-models.

separate paragraph. These four reusable packaging models operate differently and should be evaluated and treated as individual and unique pathways to reuse and refill.

Additional detail should also be added to the description of each model in order to clearly identify the differences between them. Please see our recommended language below:

- ***Refill at home*** *means when a consumer owns a reusable container, purchases refills (either online or in store), and refills their reusable container at home.*
- ***Refill on the go*** *means when a consumer owns a reusable container and refills that container away from home through either in-store bulk dispensers or bring your own programs.*
- ***Return from home*** *means when a consumer uses reusable packaging that is owned by a producer or third party and is then collected from the consumer's home for reuse.*
- ***Return on the go*** *means when a consumer brings reusable packaging that is owned by a producer or third party to a collection point, such as a drop-off bin, store, or deposit return machine to be collected and reused.*

Revising Section 9.3.4 to clearly define and distinguish between the four different reusable packaging models will ensure that the full needs assessment correctly evaluates programs and infrastructure for each different type of reuse and refill systems.

Include Existing Wash Hubs in Reuse Infrastructure Analysis:

The draft preliminary needs assessment provides a broad overview of the reuse and refill infrastructure in Washington, but fails to identify wash hubs that are operating in the state. Both return from home and return on the go reuse systems rely on washing and sanitization infrastructure for returnable reusable packaging. Four wash hubs[2] currently operate in Washington, run by r.World, Encora, Bold Reuse, and Perennial Zero Waste. **Please strengthen Section 9.3.4 to explicitly identify these existing wash hubs that represent essential infrastructure for reuse.**

Include Additional Recommendations in Section 13.0:

Reuse and refill systems cannot grow without sufficient infrastructure, including collection points for consumers to return used, empty packaging; sorting and washing facilities to capture and sanitize reusable packaging; and transportation - both to bring returned packaging to sorting and washing facilities and to ensure empty packaging is returned to producers for recirculation. Upstream believes that there are immense opportunities to leverage existing and expanding recycling infrastructure and investments, as well as existing business-to-business reuse infrastructure, to support reuse systems, reduce costs, and increase efficiencies. **An additional recommendation should be added to Section 13.0**

[2] Upstream. "Wash Hub Map for the U.S. & Canada." Upstreamsolutions.org, September, 2026. https://upstreamsolutions.org/reuse-service-provider-map.

that explicitly directs the full needs assessment to evaluate opportunities to accommodate increasing amounts of reusable packaging by leveraging current recycling and business-to-business infrastructure in the state. Opportunities for cost savings and efficiencies for reuse systems should also be evaluated (e.g., utilizing business-to-business reuse infrastructure, co-location of material recovery facilities and wash facilities, co-packing infrastructure, and utilization of excess capacity on existing wash or fill lines). Effectively scaling reuse requires shared infrastructure and interoperable systems, and the full needs assessment should assess these opportunities in Washington.

Thank you for the opportunity to submit comments on the draft preliminary needs assessment for the RRA. We appreciate the initial incorporation of reuse and look forward to seeing a more extensive evaluation of reuse programs and infrastructure in the full needs assessment. For any questions, please feel free to contact melissa@upstreamsolutions.org.

Sincerely,

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