July 24th, 2026

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

Re: Comments on EITE Allowance Allocations from 2035-2050

The Glass Packaging Institute (GPI) offers the following comments on Ecology's *Report and Recommendations to the Legislature on EITE Allowance Allocation for 2035-2050*

GPI is the North American trade association for the glass food and beverage manufacturing companies, glass recycling processors, raw material providers and other supply chain partners within the industry. GPI and its members work closely with local and state governments throughout the country on issues surrounding sustainability, recycling, packaging manufacturing and energy use.

In the state of Washington, O-I Glass operates a container manufacturing facility in Kalama. Their facility is among the covered EITES across the state. Similar to many glass container manufacturing plants in states along the West Coast, the bottles are sensitive to, and impacted by, empty glass container imports from under-regulated countries across the Southeast Asian region. Ensuring a maximum number of credits remains available after 2034 is a priority for the Kalama plant operations.

Glass Container Recycling Background

The most effective and direct way to reduce energy-use and emissions at the plant level is by increasing the amount of recycled glass in the batch mix.

The glass container manufacturing industry has a significant stake in the effectiveness of glass recycling programs. Recycled glass is a key component of the manufacturing process. The industry purchases about 2.1 million tons of recycled glass each year and the average bottle or jar produced in the U.S. contains about 25 percent post-consumer recycled glass.

For every 10% of recycled glass added to the batch mix, energy usage can be reduced 2-3 percent, with additional corresponding reductions in greenhouse gas emissions. When you add the benefit of what is a better than 1 to 1 offset of raw materials saved by using recycled glass to make new containers, it is clear that using recycled glass has significant benefits to the environment in the state and region.

Increasing and improving glass recycling should be prioritized within the Cap and Invest Program. This could be investments in dedicated glass collection programs, grant or matching funding for sorting technology, consumer education, bar and restaurant recycling programs or other avenues to get more glass back.

Trade Exposure & Future Emissions Allowance

For Washington and the broader domestic glass container manufacturing industry, exposure to bottle imports from less expensive, under-regulated countries is present now and is likely to be in the future.

With trade exposure for glass particularly concentrated on the West Coast, plants in Washington, Oregon and California face the highest levels of leakage. For smaller covered entities within the program (including glass containers) we urge the Department to consider ensuring an adequate number of allowances continue to be provided.

Thank you for your consideration of our comments. We look forward to working with the Department in the coming years on the Cap and Invest and other manufacturing and recycling focused programs.

Sincerely,

Scott DeFife
President