



October 10, 2022

Senator Christine Rolfes
State Representative Joe Fitzgibbon
State Representative Liz Berry
Former State Representative Beth Doglio

Washington State Capitol
416 Sid Snyder Ave SW
Olympia, WA 98504

Dear Legislators:

As representatives of the metal, plastic, and glass beverage container packaging industry, we have closely monitored and participated in recent legislative processes focused on modernizing recycling systems in states across the country, including the discussions in Washington. Our industries rely greatly on the creation of public policy that supports and expands recycling systems, protects the quality of recyclable materials throughout the process, and improves recycling rates to ensure both the availability of a domestic supply of material, and that more material is recovered and available to become recycled content in new products.

With Washington likely to again consider extended producer responsibility (EPR) legislation for packaging and paper products in 2023, we wanted to reach out to you as leaders in this policy space and strongly encourage you to include an industry-operated recycling refund program (also known as a deposit return system [DRS]) within any proposed EPR framework, to serve as the EPR solution for beverage containers. Well-designed recycling refund programs provide consumers with an incentive to return their empty containers through convenient take-back options (like a bulk bag program) and receive a refund value in exchange. With public policy, industry, and consumers working together, these systems can recapture 80-90% of containers included in the program, which far exceeds the recovery rates of containers in any non-recycling refund system in the country.

According to the Container Recycling Institute, the national average recovery rate for beverage containers in the United States is only 35%. Contrast that with the system just to your south, in Oregon, where the recycling refund program recovers 80-90% of beverage containers each year, not even including what is also recycled through the curbside system. There's a real opportunity for Washington to take a similar approach and collect more beverage cans and bottles by simultaneously implementing a recycling refund program along with an EPR system to collect other consumer goods, packaging, and paper.

In addition to recovering a much higher percentage of beverage containers, recycling refund programs also reduce carbon emissions, enhance the local recycling economy and create green jobs, and protect the quality of material throughout the process, which helps ensure maximum circularity in our recycling

systems. That's particularly important for us because our industries produce food-grade packaging, which requires an available supply of high-quality recyclable material to be used as content in our products.

While curbside recycling systems are critically important components of our broader recycling efforts, they are often prone to contamination. The contamination and single-stream process impacts our materials differently, but with the same results—a degradation of quantity and quality needed to make new beverage containers and food grade-packaging. In a well-designed recycling refund program, by contrast, beverage containers are separated with just other beverage containers throughout the redemption process. For glass, this means much higher yield and less passive loss to landfills. For aluminum and plastic, it means both higher yield and that they remain Grade-A materials, allowing all material types to more often be recycled back into bottles and cans again.

As you know, Washington has adopted some of the most aggressive minimum recycled content laws in the nation for plastic packaging, and in addition to packaging-specific requirements, we are all working to achieve our own sustainability goals and policies for the packaging we produce and use. In order to be successful in this endeavor and meet those goals and policies, we need access to a sufficient supply of recycled material to use in the production of new products. A recycling refund program in Washington would greatly increase the amount, and quality, of material available to meet these requirements and goals.

Finally, adoption of an EPR law without the inclusion of a deposit return system would effectively preclude a beverage container deposit program from ever occurring in Washington, which would affect the state's ability to meet its recycling goals. With strong deposit systems in both Oregon and British Columbia, there is an opportunity to further build and support a strong regional recycling economy around the clean material available for processing. The markets for any beverage container materials that have been contaminated in single-stream system are not nearly as viable. If an EPR law is adopted without a recycling refund solution for beverage containers, the curbside recycling systems in Washington will become dependent on EPR revenue from beverage manufacturers. That means that the future creation of a recycling refund program (which would produce even better recycling outcomes) would require that the Legislature effectively take funding away from curbside recycling, creating an unnecessary dichotomy and discouraging positive reforms to, and expansions of, the recycling system.

We applaud your interest in modernizing Washington's recycling system, and we share your goal of increasing recycling rates and convenience. An efficient recycling refund program is an advanced form of producer responsibility, where the beverage industry is tasked with providing and operating the entire system. Consumers who participate pay nothing to enjoy the system's litter reduction, environmental, and recycling outcomes, and in an industry-operated recycling refund program, the beverage industry assumes full responsibility to meet statutory recycling targets and consumer access/convenience requirements.

We believe that a well-designed recycling refund program is a good complement to curbside recycling systems, and the combination helps collectively achieve the highest recycling outcomes possible. Therefore, we strongly encourage you to advance a recycling refund program as part of any other

recycling policy under consideration during the 2023 Legislative Session. As industry partners, we need your help to ensure that sufficient recyclable material is available to support the truly circular economy we all hope to see.

Sincerely,



Scott Breen
Can Manufacturers Institute



Scott DeFife
Glass Packaging Institute



J.P. Toner
International Bottled Water Association



Curt Wells
Aluminum Association