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Submitted via viriniageneralassembly.gov

Virginia House Bill 826 – Beverage Container Deposit and Redemption Program

The Aluminum Association is submitting this comment in support of Virginia House Bill 826 *Beverage Container Deposit and Redemption Program* and appreciates the opportunity to provide input on it. Based in Arlington, VA, the Aluminum Association represents U.S. suppliers of primary aluminum, aluminum recyclers, and producers of fabricated aluminum products, as well as industry related businesses. Our members represent 100% of the US aluminum can sheet manufacturing capacity and they are well aware that beverage container deposit return programs provide the highest quantity and quality of used beverage cans back into the supply chain for their remanufacture into new aluminum cans. For that reason, the Association is supportive of well-designed deposit return programs such as that proposed in VA HB 826. From a review of the proposed legislation, the Association finds that many of its [best practices in deposit system design](#) are integrated into the legislation, specifically:

- **Differential pricing:** Send price signals to both brands and consumers that reflect the actual cost to recycle different types of beverage containers. These signals should reflect which materials the recycling system is best equipped to sort and process. This will reward those packaging types that the recycling system can process at scale, incentivize the leading packaging types to further build on their strengths and lead others to improve the sustainability attributes of their packaging.
- **One nonprofit to manage the system:** Create a single beverage container recycling organization that brands pay for and help lead. This will reduce net system costs and create efficiencies. If the government sets mandatory recycling rates, the organization should be focused on meeting these targets.
- **Easy and convenient redemption:** Ensure that the system is developed with consumers in mind to incentivize material recycling. In most cases, a hybrid system featuring both stand alone redemption centers and retail store access is the most effective approach. Reverse vending machines and innovations like Oregon's [BottleDrop](#) program should be considered to make the system as user-friendly as possible.

- **Including all beverage containers:** Apply the deposit requirement on all beverage containers. Excluding certain container types could incentivize consumers to avoid deposit containers and reduce recycling rates overall.
- **Using unredeemed deposits on recycling systems:** Ensure that revenues from unredeemed deposit funds are applied back to recycling infrastructure, access, education and similar programs. This revenue should not go into a general fund. Since consumers paid the deposit as part of a recycling initiative, the benefits from unclaimed deposits should be directed at improving the recycling system itself.

Again, the Aluminum Association appreciates the opportunity to express its support for VA HB 826 and is happy to provide further perspective on that support if there are questions or a need to discuss any of these issues in greater detail. If so, please do not hesitate to contact me at 703-358-2976, 804-385-6351 or cwells@aluminum.org.

Sincerely,



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The Aluminum Association