



## WASHINGTON REFUSE & RECYCLING ASSOCIATION

June 14, 2023

Department of Ecology  
300 Desmond Drive SE  
Lacey, WA 98503

To Whom it May Concern:

The Washington Refuse and Recycling Association (WRRA) is the oldest Solid Waste Trade Association operating on the West Coast of the United States, founded 76 years ago. WRRA represents the private sector solid waste and real recycling industry in Washington, from curbside collection service and state of the art recycling facilities to landfills. WRRA member companies and the solid waste industry serve a vital role in public health, safety, and environmental protection.

Our members provide essential services in their communities every day. Washington's solid waste system is a successful public-private partnership. Washington's regulated and municipal solid waste collection system provides for excellent service, has consistently beat the national recycling rate by double digits, and maintains family wage jobs in every community in which we operate— all at a transparent and affordable price. We have an obligation to serve and to provide universal service as directed by the state and local governments.

Thank you for the opportunity to comment on the Draft Phthalates Chemical Action Plan (CAP). WRRA is supportive of the department's efforts to measure and reduce phthalate exposure. WRRA members that own and operate recycling facilities, compost facilities, or landfills in Washington may also comment on the draft plan.

### **The Waste Industry Does Not Manufacture Phthalate Containing Products**

WRRA members and their operations neither manufacture nor use phthalates or phthalate containing products. WRRA members receive waste containing phthalates from the communities and industries they serve. The most effective way to manage phthalates in the environment is to reduce the presence of phthalates in products in the first place. Upstream reductions targeted at the producers of phthalates containing products will always be the most effective means to reduce public exposure to phthalates.

Initiatives that help phthalate-intensive industries reduce use of these chemicals are the most effective means of reducing phthalates in the waste stream. Crucially, state policy must be grounded in an understanding that phthalates cannot be eliminated from the waste stream unless producers eliminate them from their products and packaging. Phthalates will persist in landfill leachate, recycled products, and compost as long as significant sources of phthalates are present in the waste stream, such as food packaging, construction materials, household products, manufacturing byproducts, and other goods.

### **Focus Upstream on Producers of Phthalates**

Any plan for the management and reduction of phthalates must also address exposure to phthalates and management of phthalate containing waste. Landfills receive phthalates in various wastes, but this does not equate to public exposure. Members of the public are exposed to phthalates at a much higher frequency through the products they purchase. State of the art lined and heavily regulated landfills, like those operated by WRRRA members, play a role in sequestering and limiting public exposure to phthalate containing products at their end of life. The waste disposal industry is an obvious partner in developing sound recommendations for the management of phthalates in the long-term.

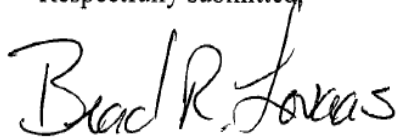
Recycling facilities, or Material Recovery Facilities (MRFs) accept recyclable materials from curbside recycling programs across the state on a daily basis. At Washington's MRFs, those recyclables go through a process called mechanical recycling, which separates curbside recyclables into bales of individual commodity streams. Mechanical recycling does not change the chemical composition of materials and phthalates present in material entering a MRF will typically be present, unchanged, in bales that exit the MRF.

For Compost, WRRRA supports the recommendation to develop and implement a plan to evaluate compostable containers and service wear for phthalates. Phthalates will always be present in any waste that contains phthalates containing products. The Department should look upstream to the producers of phthalate containing products to reduce the presence of these materials in the waste stream.

### **Conclusion**

Thank you for the opportunity to comment on this important topic and developing the plan in conjunction with a stakeholder group that included representation from the solid waste industry. Please direct any questions or comments to Rod Whittaker at [rod@wrra.org](mailto:rod@wrra.org). Thank you for the opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink that reads "Brad R. Lovaas". The signature is written in a cursive, slightly slanted style.

Brad R. Lovaas

Executive Director