



WASHINGTON REFUSE & RECYCLING ASSOCIATION

August 26, 2020

Solid Waste Management Program
Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Solid Waste Management Program:

The Washington Refuse and Recycling Association (WRRA) is the oldest Solid Waste Trade Association operating on the West Coast of the United States, founded 73 years ago. WRRA represents the private sector solid waste and real recycling industry in Washington, from curbside collection service, 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 work in their communities every day and provide essential services. 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 Task 1 Plastic Packaging in Washington: Assessing Use, Disposal, and Management report. This report contains many interesting data points but the short comment window does not provide an opportunity for stakeholders to evaluate and provide detailed responses. WRRA offers the following high-level comments on the report.

Since the onset of National Sword, plastic packaging made from resins #3, #4, #6, and #7 from residential sources has lost value or now has a negative value. The Department of Ecology's (Department) 2016 Waste Characterization Study numbers demonstrate the small quantity of these materials in the waste stream by weight:

- #3 PVC Plastic Packaging 0.002% at 123 tons
- #4 LDPE Plastic Packaging 0.002% at 96 tons
- #6 PS Plastic Packaging 0.025% at 1165 tons
- #7 Other Plastic Packaging 0.2% at 6890 tons

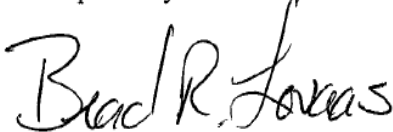
The 2020 report uses the same underlying data as the 2016 study, but changes the presentation in a way that overstates the presence of problem materials. The report cites the Department's 2016 Waste Characterization Study in tables that show the amount of plastic packaging in Washington's material stream (Ex: Table 2, Page 21). However, the report does not use the detailed categories from the Waste Characterization Study. Instead, the current report groups categories together. For example, the 2016 report breaks out plastic packaging from residential & commercial sources by resin type. The 2020 report takes the same data but only lists plastics #1, #2, and #5 by resin type. Other materials are grouped into broad categories like "other rigid plastic packaging" in the 2020 report.

Plastics #3, #4, #6, and #7 lack markets but represent less than 1% of the waste stream by weight and less than 0.1% of greenhouse gas (GHG) reductions from recycling. Nearly 90% of GHG reduction benefits from recyclables collected through municipal solid waste systems are from fiber (including paper and old corrugated cardboard or OCC). The increased system costs of collection and processing marginal materials requires substantial investment with almost no measurable environmental benefit ([See 2018 Waste Management Sustainability Report](#)). The 2016 Waste Characterization Study provides an honest accounting of plastic packaging in the material stream from residential sources and the 2020 report distorts and overstates that data. ¹

WRRRA supports transparency in the waste and recycling stream. A lack of mandatory reporting requirements for recyclables is also cited in the report as a barrier to data collection. In addition to better data, Washington needs timely data. As of August 2020, the most recent statewide recycling data available from the Department is from 2017. This data pre-dates National Sword and similar measures adopted around the world. Washington cannot make meaningful decisions without current data.

The report places demand for recyclables first when discussing the necessary infrastructure needed to create a plastic packaging recycling system that delivers environmental benefits. WRRRA agrees. Real recycling requires markets. More so than any other policy, developing strong markets for recyclables is crucial. WRRRA also supports harmonizing program material lists to reduce contamination in the waste stream and using life-cycle analysis to make decision about what materials are collected. As discussed in our other comments on this report, WRRRA supports several of the Department's recommendations that can be accomplished within the existing regulatory structure.

Respectfully submitted,



Brad R. Lovaas

Executive Director

¹ The report claims on page 36 "Due to data limitations, it is impossible to completely distinguish between packaging and non-packaging plastic or plastic products in generation estimates for various categories, but this distinction has been made where possible." The underlying data does distinguish between packaging and non-packaging plastic products in many cases.