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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.

Since the onset of National Sword, plastic packaging made from resins #3, #4, #6, and #7 from residential sources have lost value or now have a negative value. The Department of Ecology's 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 plastics 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 plastics 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 provides an honest accounting of plastic packaging in the material stream from residential sources and the 2020 report distorts and overstates that data.

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. Real recycling requires markets. More so than any other policy, developing strong markets for recyclables is crucial.

Harmonizing program material lists to reduce contamination in the waste stream and using

life-cycle analysis to make decision about what materials are collected makes all the sense in the world.

One way to approach the outlined legislative goals while minimizing the costs on businesses is to work within the existing waste management regulatory and institutional framework which exists in the state today. Several of the recommendations would require additional expensive and significant upgrades to how the state manages our waste streams. Based on the definition of "producer" adopted in the final report, this represents a massive increase in the costs of doing business in Washington and will have a certain and detrimental impact on the business environment in this state.

There appears to be some minor scope creep in the recommendations which do little to address the outlined legislative goals which directed this report. It is unclear why paper products are included in this report as they fall outside of any of the listed legislative goals to examine plastic packaging in Washington state. The report goes so far as to superficially call for the inclusion of all paper products in the state, which is far outside the intended scope of this report. In addition, there is nothing in the report to underscore the need for necessary exemptions where governed by other regulatory bodies.