

Corumat, Inc.

I applaud the efforts of the plastic packaging study. I've worked in new materials and sustainability for 15 years and have tried to keep up to date what is working and what is not. In general, industry-led initiatives, incentives, and bans are effective. California's recycling efforts have hit major roadblocks and their recycling rates appear to be decreasing, so it may not be a good model.

Seattle and other municipalities that required compostable packaging by law created a "premium" market that has allowed for innovation in packaging (and banning PFAS may solve the issues in these markets). Walmart has been a leader in packaging sustainability by creating a scorecard and getting their suppliers to be more effective in reducing packaging by that scorecard. Developing a similar scorecard that creates subsidies for "good" behavior in all packaging would provide industry a "carrot" in order to change its behavior. Working to make this scorecard universal and perhaps incentive system up/down the West coast (working with BC, Oregon, and CA) would create a large enough market to really drive change.

I have a concern with EPR and reusability in that they may not lead to truly scalable solutions. Composting is great, but it costs ~\$120/ton and so convincing the world to replace their \$30/ton landfills with it will be hard. Developing holistic, scalable solutions and using local premium markets to incentivize small companies to develop new products was effective in composting. One way WA could help would be to develop a scorecard (or perhaps modify the SPC's and Walmart's) that includes LCA methodologies, and create financial incentives for innovation (even if just at the local level). Giving "points" for scalability in solutions worldwide would be great.

Plastic Packaging Management Study

Opportunity to Provide Feedback on Draft Recommendations

Background

The Plastic Packaging Evaluation and Assessment law (Chapter [70.380](#) RCW) states that producers of plastic packaging should consider the design and management of their packaging in a manner that ensures minimal environmental impact, and that producers should be involved from design concept to end-of-life management to incentivize innovation and research to minimize environmental impacts. Per the law, the Washington State Department of Ecology (Ecology) hired an independent third-party consultant team to study how plastic packaging is managed in Washington and assess various policy options to meet the following goals:

- **Plastic packaging sold into the state is 100 percent recyclable, reusable, or compostable by January 1, 2025.**
- **Plastic packaging sold into the state incorporates at least 20 percent post-consumer recycled content by January 1, 2025.**
- **Plastic packaging is reduced when possible and optimized to meet the need for it.**

The consultant team was tasked with **making recommendations to meet the goals of reducing plastic packaging waste, including through industry initiative or plastic packaging product stewardship, or both.** The law required the consultant team to consider the following when making recommendations:

- Implications and reality of meeting the above goals, including the system needed to support recycling and composting this much packaging.
- Expected costs and benefits of proposed recommendations to state and local government agencies for administration and enforcement, as well as to private persons or businesses.
- Consistency with federal Food, Drug and Cosmetic Act (21 U.S.C. Sec. 301 et. seq.)
- Recommended infrastructure necessary for the complete management of plastic packaging in the state according to the waste management hierarchy.
- Regulatory changes that would be required to achieve any of the recommendations, which may include regulatory changes pertaining to the following:
 - Washington Utilities and Transportation Commission-governed waste systems.
 - Local recycling contract systems.
 - Statute and rule updates including Chapter [81.77](#) RCW, Chapter [70.95](#) RCW, Chapter [480-70](#) WAC, and Chapter [173-350](#) WAC.

The team was also tasked with identifying legislative options to meet plastic packaging goals that can be established and implemented by January 1, 2022, as well as within two to five years.

Feedback Instructions

The consultant team has developed draft policy recommendations to propose to Ecology based on best practices and programs research, analysis of available data on current plastic packaging use and management in Washington, and stakeholder consultation.

After reading the [draft recommendations for managing plastic packaging in Washington State](#), please use the form below to submit specific input by 11:59 pm on August 26, 2020.

We are using this form to gather feedback on levels of support, suggested alternatives, and associated funding mechanisms for the draft policy recommendations. The consultant team will accept and review all feedback on the draft recommendations received via this form by **11:59 pm PDT on Wednesday, August 26** and use it to refine and finalize recommendations. The Study's final recommendations will be submitted to Ecology on Monday, September 14. Ecology will use these recommendations to submit a report to the Legislature.

We will also continue to accept general public comments via the Study's [public comment page](#) through September 4. These public comments, and all other input received throughout the course of the Study, will become part of the public record and be included in the task-level report summarizing the stakeholder consultation process. However, any public comments or forms received after August 26 on the draft recommendations may not be specifically considered by the consultant team as we finalize recommendations. The final recommendations and the report summarizing the stakeholder consultation process will be submitted to Ecology on September 14.

Steps to complete and submit the form:

1. Save a copy of this feedback form as a Microsoft Word document named with your organization (or your name in the case of private citizens) and date of submission. E.g., PlasticStudyFeedbackForm_JSmith_8-25-20.docx. OR PlasticStudyFeedbackForm_CompanyName_8-25-20.docx.
2. Enter your name and organization/affiliation in the grey form fields, and select the appropriate sector using the dropdown menu. For trade associations, lobbyists, nonprofits, community-based organizations, and other advocacy organizations, please enter the industry, interest, or issue area you represent in the grey form field.
3. For each recommendation, select the option in the dropdown menu in the "Support/Don't support" column that best describes your support for each proposed recommendation. If you do not support part or all of a recommendation, **please provide a specific change or alternative recommendation to meet the legislative goals, as well as a sustainable funding source (if applicable) to support your approach.**

Please keep in mind that proposed recommendations were each designed to meet the legislative goals summarized above and in the context of a financed system.

4. Save your completed feedback form and email it as an attachment to WAPlasticPkgStudy@cascadiaconsulting.com by 11:59 pm on August 26. Contact WAPlasticPkgStudy@cascadiaconsulting.com with any questions.

If you choose to provide additional comments in response to the questions in the “Suggested change or alternative” and “Sustainable funding source” beyond this form via the [public comment page](#):

- Please select an option in the “Support/Don’t support” column for your general opinion to be considered as the consultant team finalizes recommendations.
- You can then mention in the associated comment fields that you will be submitting additional comments under separate cover.

Additional comments must be submitted by **August 26** for them to be considered as the consultant team finalizes recommendations. Comments submitted via the [public comment page](#) through September 4 will be appended to the report to Ecology summarizing the stakeholder consultation process.

Draft Recommendations Feedback Form

Name: Michael Waggoner
Sector: Packaging or Packaged Goods Producer
Organization/Affiliation: Corumat, Inc.
Industry/Issue Area: (for trade associations, lobbyists, advocacy organizations, nonprofits, and CBOs)

#	Recommendation	Support/Don't support	Suggested change or alternative to recommendation that meets legislative goals	Sustainable funding source or mechanism for your change/alternative
Primary Recommendations (intended to be implemented as a package or in combination and cover all packaging, not just plastic)				
1	EPR Policy Framework for All Packaging	Could support with the following changes	Providing a tax or subsidy to support these efforts would be helpful	Providing a state-funded resource to help manufacturers find/obtain funding would be great.
2	DRS for Beverage Containers (part of or separate from EPR)	Could support with the following changes		
3	Recycled Content Requirements for Plastic Packaging	Support as is		
Interim Recommendations (could be implemented on their own as a first step toward adoption of the full suite of primary recommendations)				
4	Producer Registry and Packaging Reporting	Support as is		
5	Recycled Content Requirements for Plastic Beverage Containers	Could support with the following changes	Develop a scorecard (or adopt Walmart's/SPC's) that would reward producers for incrementally better behavior	
Complementary Recommendations (complementary to primary recommendations but narrower in scope)				
6	Recycled Content Requirements for Trash Bags	Don't support, suggest the following alternative	Doing nothing may be better	Historical efforts in this have resulted in products with higher environmental impact due to poorer performance
7	Ban on Problematic and Unnecessary Plastic Packaging	Could support with the following changes	Develop a scorecard including LCA methodologies to minimize harmful environmental effects	
8	Standard for Customer Opt-In for Foodservice Packaging & Accessories	Could support with the following changes	Develop a scorecard including LCA methodologies to minimize harmful environmental effects	

#	Recommendation	Support/Don't support	Suggested change or alternative to recommendation that meets legislative goals	Sustainable funding source or mechanism for your change/alternative
Recommendations for Agency Action (cover agency activities that should not require legislative action to implement)				
9	Strengthen Data Collection on Final Destinations of Materials Sent for Reprocessing	Support as is		
10	Support Development and Adoption of Reusable Packaging Systems	Don't support, suggest the following alternative		There's a pandemic, and this won't necessarily develop scalable alternatives. Support innovative, holistic solutions to plastic waste.