



June 30, 2023

Shannon Jones  
Department of Ecology  
Solid Waste Management Program  
PO Box 47600  
Olympia, WA 98504-7600

RE: Post-Consumer recycled content rulemaking (Chapter 173-925 WAC)

Dear Ms. Jones:

On behalf of the members of the American Chemistry Council (ACC), thank you for the opportunity to comment on the Department of Ecology's (ECY) proposed post-consumer recycled content (PCR) rulemaking (Chapter 173-925 of the Washington Administrative Code (WAC)).

ACC supports efforts to create a more circular economy for plastics and we were among the first organizations to establish ambitious, forward-thinking goals that all plastic packaging in the United States is reused, recycled, or recovered by 2040 and that all U.S. plastic packaging is recyclable or recoverable by 2030. A key component of achieving these goals will be the establishment of sustainable end markets for recovered plastics.

As producers strive to meet the requirements of this statute and voluntary industry targets for increased use of recycled resin in new packaging, manufacturers will need access to recycled materials from a variety of sources. ACC supports the inclusion of proposed language in WAC 173-925-060 that recognizes varying recycling processes and requires that any data/claims be validated by recognized 3<sup>rd</sup> party certification systems.

The requirements in the proposed rule ensure materials are tracked through complex manufacturing systems in a verifiable and transparent fashion. Similar accounting and verification systems are used to track renewable energy, forest products, coffee, and other products. The proposed language will ensure transparency, consistency and that recycled content claims are attributed accurately.

ACC appreciates and thanks ECY for the past dialogue on this important issue. We look forward to working with ECY and other stakeholders to improve the recovery of plastics packaging so that more recycled material can be used as feedstock to manufacture new packaging. Thank you again for the opportunity to provide these comments. Should you have any questions, please contact me at [tim\\_shestek@americanchemistry.com](mailto:tim_shestek@americanchemistry.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Ti Shestek", with a long horizontal line extending to the right.

Tim Shestek  
Senior Director, State Affairs  
American Chemistry Council

