
Plastic post-consumer recycled content (PCRC) Workload Analysis for Fiscal Year 2026

Background

The law ([RCW 70A.245.020](#)) requires us, the Department of Ecology, to prepare a yearly Workload Analysis (WLA) for public review and feedback. This report explains the costs we expect to cover as we implement, manage, and enforce post-consumer recycled content (PCRC) requirements.

This WLA estimates costs for Fiscal Year (FY) 2026, which runs from July 1, 2025, to June 30, 2026. The fee amount is adjusted based on the actual overages (or underages) reported in FY 2024. The fee is spread across the producers registering in April 2025 and reporting their resin loads for calendar year 2024. The fees will be assessed in May of Calendar Year (CY) 2025.

Our work is divided into two main categories of costs:

- Program Administration Costs
- PCRC Oversight Costs

All covered producers are required to pay a percentage of Program Administration costs, and covered producers with products that must include post-consumer resin must pay a percentage of PCRC Oversight costs. Once recycled content requirements have taken effect for all product categories, both categories of costs will be split among all producers.

Below, you'll find a summary of our estimated costs for these activities. More details are provided on the following pages.

Table 1: Summary of estimated costs by cost category and workload type

Cost Object	Program Administration	PCRC Oversight	Total
Salaries	\$170,559	\$102,791	\$273,350
Benefits	\$57,478	\$34,641	\$92,119
Goods and Services	\$11,612	\$6,350	\$17,962
Travel	\$4,234	\$2,315	\$6,549
Equipment	\$2,469	\$1,350	\$3,819
Annual Data Purchase	\$0	\$30,000	\$30,000
Assistant Attorney General	\$4,000	\$4,000	\$8,000
Agency Administrative Overhead	\$68,183	\$41,092	\$109,275
Total Costs	\$318,535	\$222,539	\$541,074

Estimated costs for program administration

The Program Administration tasks include:

- Helping companies register and, if required, report, each year according to the requirements
- Creating and sharing the annual workload analysis and responding to public comments
- Calculating each producers’ fair share of the annual fee
- Maintaining the online registration system and database

Tables 2 and 3 show what we plan to do next year and how much it will cost.

Table 2: Estimated program administration workload by position and Full-Time Equivalent (FTE)

Position	Job Classification	Role	Standard Salary	FY 2025 FTE
Plastic Packaging Subject Lead	Environmental Planner 4	Provide oversight and coordination of program administration	\$95,652	0.45
Technical Assistance/Compliance	Environmental Specialist 3	Provide registration technical assistance, fee administration, and enforcement of registration and fee requirements	\$69,313	1.35
IT App Developer	IT Business Analyst - Journey	Maintain and improve the annual registration online platform and database	\$107,148	0.07
Workload Analysis Lead	Budget Analyst 4	Prepare the annual workload analysis and assist with fee calculation	\$93,348	0.05
Agency Administrative Overhead	See notes on costs in the table below			0.29
Total FTEs				2.21

Table 3: Estimated program administration costs by cost category

Cost Object	Description	Estimated Cost
Salaries	Salaries are based on the estimated staff time and the current biennium actual salary rates for the listed positions, at step L.	\$170,559
Benefits	Benefits are the agency average of 33.70% of salaries.	\$57,478
Goods and Services	Goods and Services are the agency average of \$6,048 per direct program FTE.	\$11,612
Travel	Travel is the agency average of \$2,205 per direct program FTE.	\$4,234
Equipment	Equipment is the agency average of \$1,286 per direct program FTE.	\$2,469
Assistant Attorney General	This estimate is for the workload in the Office of the Attorney General for Assistant Attorney General (AAG) legal counsel regarding rulemaking and enforcement of registration requirements.	\$4,000
Agency Administrative Overhead	Agency Administrative Overhead is calculated at the federally approved agency indirect rate of 29.90% of direct program salaries and benefits. Agency Administrative Overhead FTEs are included at 0.15 FTE per direct program FTE.	\$68,183
Total Costs		\$318,535

Estimated Costs for Post-Consumer Recycled Content (PCRC) Oversight

Post-Consumer Recycled Content (PCRC) Oversight tasks include the following:

- Providing Technical Assistance to producers for meeting PCRC requirements and submitting annual reports
- Reviewing and posting annual report data
- Developing and maintaining the annual reporting online platform and database
- Reviewing requests for PCRC rate adjustments and temporary exclusions
- Aiding compliance with PCRC requirements

Tables 4 and 5 summarize our workload assumptions for next fiscal year and the resulting cost estimates.

Table 4: Estimated program PCRC oversight workload by position and Full-Time Equivalent (FTE)

Position	Job Classification	Role	Standard Salary	FY 2025 FTE
Plastic Packaging Subject Lead	Environmental Planner 4	Implement a process for reviewing requests for PCRC rate adjustments and temporary exclusions; implement enforcement actions	\$95,652	0.40
IT App Developer	IT App Development - Journey	Maintain the annual reporting online	\$107,148	0.20
Technical Assistance/Compliance	Environmental Specialist 3	Provide technical assistance and compliance support for PCRC requirements and reporting; post required annual reporting data to the website	\$69,313	0.45
Agency Administrative Overhead	See notes on costs in the table below			0.16
Total FTEs				1.21

Table 5: Estimated PCRC oversight costs by cost category

Cost Object	Description	Estimated Cost
Salaries	Salaries are based on the estimated staff time and the current biennium actual salary rates for the listed positions, at step L.	\$102,791
Benefits	Benefits are the agency average of 33.70% of salaries.	\$34,641
Goods and Services	Goods and Services are the agency average of \$6,048 per direct program FTE.	\$6,350
Travel	Travel is the agency average of \$2,205 per direct program FTE.	\$2,315
Equipment	Equipment is the agency average of \$1,286 per direct program FTE.	\$1,350
Annual Data Purchase	To review requests for PCRC rate adjustments and temporary exclusions, Ecology will need to purchase data on market availability of recycled plastic resin from an independent third-party organization. Estimated annual cost for data on recycled plastic resin availability is \$30,000.	\$30,000
Assistant Attorney General	This estimate is for the workload in the Office of the Attorney General for Assistant Attorney General (AAG) legal counsel regarding criteria and procedures for PCRC rate adjustments and temporary exclusions, and enforcement of the PCRC requirements.	\$4,000
Agency Administrative Overhead	Agency Administrative Overhead is calculated at the federally approved agency indirect rate of 29.90% of direct program salaries and benefits. Agency Administrative Overhead FTEs are included at 0.15 FTE per direct program FTE.	\$41,092
Total Costs		\$222,539

Estimated costs by product category

The estimated costs for each covered product category are calculated using the latest available registration data submitted by producers in the calendar year 2024. Actual costs will be based on registration and reporting data submitted by producers by April 1, 2025

Table 6: Estimated costs by product category

Please note: the costs in the table below are estimates based on the best available data. The final producer fees for FY 2026 costs will be calculated using data submitted by producers for the registration and reporting period that closes on April 1, 2025.

Product Categories and Resin Weights Reported in Calendar Year 2024 Registration ¹			Estimated Program Administration Costs by Product Category		Estimated PCRC Oversight Costs by Product Category		Total Estimated Costs by Product Category
Product Category (PCRC Content Compliance Date)	Total Plastic Resin Weight (in Lbs.)	Plastic Resin Weights subject to PCRC Content Requirements ²	All Covered Categories % Total Plastic Resin Weight	Category Share of Program Administration Costs	PCRC Product Categories % Total Plastic Resin Weight	Category Share of PCRC Oversight Costs	
Trash Bags (Jan 1, 2023)	49,093,672	49,093,672	29%	\$91,285	32%	\$70,197	\$161,482
Beverage Containers (Jan 1, 2023)	85,844,244	85,844,244	50%	\$159,619	55%	\$122,747	\$282,366
Household and Personal Care (Jan 1, 2025)	20,697,288	20,697,288	12%	\$38,485	13%	\$29,595	\$68,080
Delayed Beverage Containers (Jan 1, 2028)	15,675,578	-	9%	\$29,146	0%	\$0	\$29,146
Total	171,310,781	155,635,204	100%	\$318,535	100%	\$222,539	\$541,074

¹The weights in this table are based on data producers submitted during the CY 2024 registration period. We will calculate final individual producer fees using the registration data submitted by April 1, 2025 for the CY 2025 registration period.

During registration, producers will report the plastic resin weights they sold or brought into Washington State in 2024. This table shows cost estimates based on the data we have so far.

Plastic Producer Annual Fees

The fee calculation

FY 2025 producer fees are calculated based on the producer's reported total pounds of covered product plastic resin data submitted during the annual registration or reporting with Ecology by April 1, 2025. The calculation formulas are provided in the rule and the [Guidance Document](#).

The values for the Program Administration Cost and the PCRC Oversight Cost will be the total estimates in the workload analysis.

The law requires each non de-minimis producer to pay a fair share of the costs outlined above. Ecology has created a rule ([Chapter 173-975 of the Washington Administrative Code](#)) that explains how we calculate and fairly distribute these fees.

For Fiscal Year (FY) 2025, we will calculate producer fees based on the total pounds of covered plastic resin products reported during annual registration or reporting. Producers must submit this data to Ecology by April 1, 2025. The rule (Chapter 173-925 WAC) and the [Guidance for post-consumer recycled content law](#) provide the formulas for these calculations.

The Program Administration Cost and PCRC Oversight Cost will be based on the total estimates from this workload analysis.

Fee “rate” per total pound of plastic resin

Using the current cost estimates for FY 2026 and the plastic resin weights reported for calendar year 2023 during the 2024 registration period, we’ve estimated the fee “rates” per pound of plastic in covered products. These rates can help producers estimate fees due in May, 2025 based on their knowledge of their products’ plastic resin weights.

As a reminder, the actual fees for FY 2026 (due in May 2025) will be calculated using plastic resin weight data from calendar year 2024, submitted by April 1, 2025. While the total cost estimate won’t change, the weights of plastic resin may vary.

We’ll calculate fees after registration closes on April 1, 2025. Invoices will go out by mid-May 2025, and fee payments will be due by mid-June 2025.

- Estimated Program Administration Cost per pound of plastic resin: \$0.0011/lb
- Estimated PCRC Oversight Cost per pound of plastic resin: \$0.0013/lb

More information

Public Comments on this document are open until March 3, 2025. To provide comments, visit our [comments webpage](#).

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