



June 12, 2026

Department of Ecology
State of Washington
P.O. Box 47600
Olympia, WA 98504-7600

RE: Greeting Card Association Comments on Recycling Reform Act (Chapter 70A.208 RCW) – Classification of Greeting Cards

The Greeting Card Association (GCA) and our 8 undersigned Washington State members respectfully offer the following comments regarding the classification of greetings cards under the proposed rules implementing Washington State's Extended Producer Responsibility (EPR) law that would designate greeting cards as low-grade paper products. Instead, we urge that greeting cards be considered within the scope of archival-grade paper products exempted under the new law.

Since 1941, The GCA has served as the U.S. trade association for the greeting card and social expressions industry, with the mission of promoting the tradition of sending greeting cards, helping members grow their business through leadership and advocacy on industry issues, and celebrating creativity. The GCA represents more than 200 American and international publishers, including 11 members in the state, most of whom are start-ups and small to medium size businesses, as well as suppliers that provide production services and product distribution to the industry.

We believe that the proposed classification of greeting cards as low-grade paper products is not accurate and argue that due to numerous differences from the intended use and waste profile from such products, they are functionally equivalent to archival-grade products that are exempted under the law. While the text does not define archival-grade products, the function is

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to exempt material that is intended for long-term retention and we believe greeting cards clearly fall into that category for the following reasons:

Greeting Cards Are Manufactured and Purchased for Archival Purposes

Greeting cards are fundamentally different from disposable printed paper. Greeting cards are designed and manufactured with the intention of being retained, preserved, and cherished over time, rather than disposed of immediately after use. Their function, as often reflected in their price, is inherently different from disposable printed paper items such as mailers, flyers, or other low-grade printed materials. The majority of greeting cards are constructed using durable materials and artful features, and contain enduring messages, all of which contribute to their retention by the recipient. This distinguishes greeting cards from categories of quickly-discarded paper that are the focus of EPR programs—such as flyers, mailers, and catalogs—which are designed for immediate disposal and high-volume circulation.¹ Greeting cards are purpose-built with long-term retention and preservation in mind. Their production and intended use align closely with archival principles of permanence and long-term value, especially when supplemented by the addition of personal messages written by loved ones.

Minimal Impact on Recycling Systems

Greeting cards simply do not present the same system pressures or material flows as high-volume, disposable paper streams. Greeting cards do not contribute to contamination potential or recycling infrastructure challenges typically associated with low-grade paper. Their inclusion as “low-grade paper products” in no way accurately reflects their intended use, material composition, or compatibility with recycling systems. A simple test confirms this. How many pieces of paper did you discard yesterday and how many of them were greeting cards?

The RCW 70A.208.090(1)(b) evaluation framework prioritizes system compatibility, contamination potential, and market fit. The retention rates, durability, and non-disposable function of greeting cards is more closely aligned with the profile of archival grade paper products, and thus we urge they be exempt from the obligations and requirements imposed on

¹ [Waste & Toxics - Washington State Department of Ecology](#)

low-grade paper products because they do not perform similarly to disposable paper products across these criteria.

The Recycling Reform Act establishes a comprehensive EPR framework for packaging and paper products, but it also relies on appropriate product differentiation to ensure that obligations are applied where they are most impactful.² The inclusion of greeting cards within the classification of archival-grade paper will align implementation with statutory intent and avoid unnecessary regulatory burden on products that do not drive system costs while maintaining the appropriate focus on materials that meaningfully impact recycling outcomes.

For these reasons, GCA respectfully requests that greeting cards be removed from the “low-grade paper products” category and re-classified in the archival grade paper category. This action will ensure that the regulatory framework fairly and accurately reflects the unique qualities and usage patterns of greeting cards.

Thank you for your consideration. If additional information or clarification is needed, I am happy to provide further details.

Sincerely,



Mary Beth Sibert, President,
Greeting Card Association
Amicreative, LLC, Renton
Biely & Shoaf Co., Seattle
Honeyberry Studios, Arlington
Little Green, Tacoma
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² [Washington State Enacts EPR Program for Packaging and Paper Products | Insights | Holland & Knight](#)
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