



June 23, 2026

Submitted via Department of Ecology Comment Portal
RE: Recycling Reform Rulemaking – Chapter 173-950 WAC (Comment Period #1)

To Whom It May Concern:

The Greeting Card Association (GCA) and its Washington State members listed below respectfully submit the following comments on the Department of Ecology's draft rule language implementing the Recycling Reform Act (Chapter 70A.208 RCW), as part of the Chapter 173-950 WAC rulemaking.

These comments build upon GCA's June 12, 2026 letter to the Department of Ecology and focus specifically on the classification of greeting cards within the proposed framework. As Ecology develops statewide material lists and related definitions, it is critical that greeting cards are not inappropriately categorized alongside low-grade, disposable paper products.

I. RULEMAKING CONTEXT

Chapter 173-950 WAC will guide implementation of Washington's Extended Producer Responsibility (EPR) program for packaging and paper products. This program covers a broad range of paper products such as flyers, brochures, catalogs, and magazines, which are designed for immediate disposal and high-volume circulation.

The rulemaking must therefore carefully distinguish between these high-volume disposable materials and specialty paper products that have fundamentally different use profiles and lifecycle characteristics.

II. GREETING CARDS ARE NOT LOW-GRADE PAPER

Greeting cards are categorically distinct from the types of materials the statute and rulemaking are designed to address. Unlike flyers, mailers, and catalogs—which are mass-produced and intended for immediate disposal—greeting cards are designed, purchased, and received for long-term retention.

Greeting cards:

- commemorate meaningful life events such as birthdays, anniversaries, and milestones;
- often include handwritten personal messages, signatures, or photographs; and
- are frequently kept, stored, or displayed as keepsakes.

This functional purpose is wholly inconsistent with classification as low-grade paper. Treating greeting cards as equivalent to ephemeral printed materials would not accurately reflect their lifecycle or consumer use behavior.

PO Box 3406 | Englewood, CO 80155 | Tel: 303.848.2522 | Fax: 303.200.7099
gca@greetingcard.org | www.greetingcard.org
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III. ALIGNMENT WITH STATUTORY EVALUATION CRITERIA

RCW 70A.208.090 directs Ecology to evaluate materials based on key criteria including volume, compatibility with recycling systems, contamination potential, and life-cycle considerations.

Greeting cards do not meet the profile of materials that drive recycling system costs or inefficiencies:

- Volume: greeting cards represent a small, occasion-based category rather than a high-volume waste stream.
- Compatibility: they are paper-based and compatible with existing recycling infrastructure.
- Contamination potential: they do not meaningfully contribute to contamination.
- Lifecycle: their retention rates are substantially higher than disposable printed paper.

For these reasons, greeting cards do not align with the materials that the EPR program is intended to regulate under a low-grade paper framework.

IV. POLICY CONSIDERATIONS

Including greeting cards in a low-grade paper category would impose regulatory obligations without corresponding environmental benefit. The EPR system is intended to focus on materials that meaningfully impact recycling system costs, contamination, and performance.

Applying EPR obligations to greeting cards would:

- divert program resources away from higher-impact materials;
- misalign regulatory treatment with actual material behavior; and
- create disproportionate burdens on small and medium-sized creative businesses that make up a significant portion of the industry.

By contrast, excluding or appropriately classifying greeting cards within the scope of archival-grade paper products exempted under the new law supports the statute's intent while maintaining focus on high-volume, problematic material streams.

V. REQUEST FOR RULEMAKING OUTCOME

Accordingly, GCA respectfully requests that Ecology:

- clarify in rule or guidance that greeting cards are not considered low-grade paper products;
- recognize greeting cards as archival-grade or otherwise exempt paper products intended for long-term retention;
- ensure that greeting cards are not subject to EPR obligations applicable to disposable printed paper; and
- reflect this distinction in statewide material lists and related definitions developed under Chapter 173-950 WAC.

VI. CONCLUSION

The success of the Recycling Reform Act depends on accurate material classification and appropriate targeting of high-impact waste streams. Greeting cards are not disposable printed paper and should not be regulated as such.

We appreciate the Department's consideration of these comments and stand ready to provide additional information as needed.

Sincerely,

Mary Beth Sibert
President, Greeting Card Association

Amicreative, LLC, Renton
Baby Buddha Studio, Seattle
Biely & Shoaf Co., Seattle
Honeyberry Studios, Arlington
Little Green, Tacoma
Paper Luxe, Tacoma, Gig Harbor
Pioneer Square Press, Seattle
Queen Fayzel, Seattle
Yardia, Seattle

CC: Jory Kate Haslett, Chair, GCA Public Affairs Committee
Rafe Morrissey, GCA Vice President, Public Affairs
GCA Public Affairs Committee