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Washington Department of Ecology's rulemaking authority under this chapter is well suited to require that the plan-approval and cost-recovery-fee provisions incorporate specific measurement and reporting discipline before a plan can be approved, framed as procedural and definitional requirements tied to the rule's two stated purposes, rather than as freestanding new substantive standards.

On this point, it is worth noting that even the EU's Packaging and Packaging Waste Regulation, the most comprehensive packaging framework currently being phased in worldwide, anchors its recyclability grading to a weight-based calculation, with design-for-recycling and recycled-at-scale criteria layered in only from 2035. As global measurement standards continue to evolve in this direction, will the Department consider whether particle size and count should be tracked alongside weight when a plan's contamination-measurement methodology is reviewed for completeness — particularly given that weight-based accounting is known to under-represent lightweight film and fragment contamination relative to its effect on sortation and market quality?

Washington's own Organics Management Law (HB 1799, 2022) already establishes generator-threshold reporting obligations for organic waste; given that precedent, is there an opportunity for this rulemaking to clarify, even briefly, how contamination of organics and compostable streams by non-compostable packaging will be reconciled between the chapter 173-950 program and the Department's existing organics management framework, rather than leaving that coordination to be worked out after both programs are already operating in parallel?