

August 19, 2026

Submitted electronically via Public Comment Form

RE: Recycling Reform Act, Preliminary Collection Lists (open August 5, 2026)

Dear Department of Ecology:

The Association of Plastic Recyclers (APR) is committed to improving plastics recycling in Washington and supporting the effective implementation of the Recycling Reform Act. We appreciate the opportunity to provide comments on the Preliminary Collection Lists.

APR is a U.S.-based, international non-profit association and the only North American organization focused exclusively on improving the recycling of plastics. APR members are the entirety of the plastics recycling industry from design to collection to recovery to remanufacturing. APR represents 80+% of the processing capacity for post-consumer plastic packaging in the US and Canada, including the plastic recyclers that process most of the plastics collected from Washington's programs.

We respectfully submit the following recommendations specific to the plastics categories:

Recommendations

1. **Add common industry practices to the evaluation criteria.** APR recommends the evaluation criteria also include "alignment with common industry practices and available data." Many of the plastic categories do not align with how MRF sort plastics into industry bale specifications or how plastic reclaimers process materials. This means it will be difficult to gather data on some of these product categories. Alignment with existing MRF and reclaimer practices will ensure better data to better inform the Program Plan.
2. **Combine several plastic categories:** We encourage you to review several of the plastic categories that do not align with industry practices or other states, specifically the "large" container categories, the plastic lids categories, and the PE film categories (see below).
3. **Emphasize alignment with other states:** While this is included in one of the evaluation criteria, we encourage the Department to put additional weight on this criterion. Creating distinct categories for Washington will increase costs for producers, reclaimers, haulers, and other entities without providing clear benefits to residents. We recommend further discussion on when, and why, it would be truly

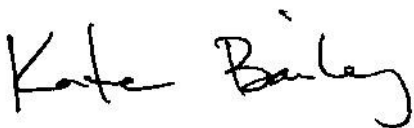
necessary to create a Washington specific product category or definition, and the disadvantages of custom categories to overall program efficiency.

4. **Add PE film (#66) to the Alternative Collection List.** The distinction between categories #65 and #66 for PE plastic film does not accurately reflect the recyclability of this packaging. The products should be evaluated based on their recyclability, not on whether or not it is food packaging. APR would appreciate the opportunity to discuss how we evaluate film plastics for recyclability and how to drive companies to design film plastics toward greater recyclability.

APR specifically thanks the ECY team and the Advisory Board for recognizing the importance of product design in assessing plastics recyclability and for referencing the APR Design Guide. APR would welcome the opportunity to discuss how and when the specifications of the Design Guide—such as definitions, sizes, film types, and more—can be most appropriately integrated into the collection lists, CAA reporting categories, ecomodulation, and other parts of the law.

APR staff and members are available at your convenience to discuss these comments and share further information. Please contact Kate Bailey, Chief Policy Officer, at katebailey@plasticsrecycling.org.

Sincerely,



Kate Bailey

Chief Policy Officer

Association of Plastic Recyclers (APR)