



TO: Washington Department of Ecology
Submitted via [online form](#)

RE: Foodservice Packaging Institute Comments on the Recycling Reform Act's Preliminary Statewide Collection Lists

DATE: August 19, 2026

To Whom it May Concern:

On behalf of the Foodservice Packaging Institute (FPI), we appreciate the opportunity to provide comments for your consideration regarding the Preliminary Statewide Collection Lists as a part of the Recycling Reform Act.

Founded in 1933, FPI is the leading authority on foodservice packaging in North America. We support the responsible use of all foodservice packaging and advocate for a fair and open marketplace for all materials. FPI's core members include raw material and machinery suppliers as well as packaging manufacturers, representing approximately 90 percent of the industry. Additionally, some distributors and purchasers of foodservice packaging are part of FPI's affiliate membership.

The foodservice packaging industry is committed to reducing the impact of its products on the environment and is dedicated to increasing their recovery. As you are aware, FPI has several special interest groups that bring together the supply chain to develop and promote economically viable and sustainable recovery solutions for foodservice packaging. These special interest groups include the Paper Recovery Alliance, Plastic Recovery Group, Paper Cup Alliance and Foam Recycling Coalition. You may access more information on these groups and their efforts [here](#).

FPI appreciates the thoroughness and inclusive approach Ecology has applied in developing the initial residential recycling and public place recycling collection lists. FPI appreciates Ecology's approach of evaluating materials against Washington's current recycling and composting capabilities while recognizing the potential for future system growth. This approach promotes collaboration and innovation and is reflected in the robust lists presented for consideration. FPI is encouraged by the comprehensive nature of the proposed lists.

Please find below our comments, questions and recommendations for your consideration.

FPI agrees with Ecology's objective to strengthen the technical basis for the lists and offers up a few specific items that may require additional consideration, beginning with material classes and names. Several material names on the Residential and Public Place Collection Lists refer to "food service" or "foodservice" specifically in both the Paper Packaging and Rigid Plastic Packaging material classes. In examining the statewide lists, it appears the categorical intention was to separate food packaging items from non-food packaging items. If this is the case, foodservice packaging items should be placed in the same categories as other food packaging items. It is our understanding that the underlying statute (Recycling Reform Act) does not differentiate between foodservice and other types of food packaging, and we would recommend the statewide lists not create an unnecessary subdivision.

FPI would also request the development of definitions for both “uncoated” and “coated” paper packaging. Without clear categorical definitions for these terms, ambiguity exists that may lead to different interpretations rather than a common understanding of the underlying intentions. Additionally, classifying clay coated materials as “uncoated” is confusing. Creating transparent definitions for these terms would be welcomed clarification.

Additionally, FPI identified inconsistencies in material names and covered material descriptions that may create uncertainty about how certain products should be categorized. For example, uncoated molded fiber is included in material number 6, Uncoated Food Service Paper and Molded Pulp Packaging. However, it is unclear where coated molded fiber foodservice products would be classified. Further, material number 8, Other Molded Pulp Packaging, specifically states that “molded pulp food service belongs in Uncoated Food Service Paper.” This leaves no apparent category for coated molded pulp or molded fiber foodservice products.

Similar questions arise in the compostable paper categories. Material number 9, Certified Compostable Coated Food Service Paper, which appears to capture certified compostable paper foodservice packaging but there is no category clearly indicated for certified compostable coated paper food packaging products. By comparison, material number 59 combines certified compostable plastic food and foodservice packaging within a single category.

FPI recommends reviewing the material categories and descriptions to ensure products can be readily and consistently classified and that similar food and foodservice packaging products are treated consistently across material classes.

In examining the Full Evaluation Matrix accompanying the lists for material number 10, Polycoated Fiber Food Packaging, the End Markets Key Notes describe the following: *Per RFI, 1 in state end market and 35 end markets in the United States and Canada that accept polycoat including 32 that accept polycoat cups in mixed paper bales. and 3 that accept polycoat bales containing cartons and cups. Could be strong end markets, with the caveat that there can only be negligible amounts of food residue.) Per RFI, 1 in state end market and 35 end markets in the United States and Canada that accept polycoat including 32 that accept polycoat cups in mixed paper bales. and 3 that accept polycoat bales containing cartons and cups.* This description has an inaccuracy. Per FPI’s response to the Department’s Request for Information submission, the 35 end markets mentioned in the notes accept polycoated paper cups, not “polycoat.” The description goes on to state “polycoat cups”, but the initial reference does not. This could lead to confusion and misinterpretation of end market acceptance for polycoated fiber food packaging.

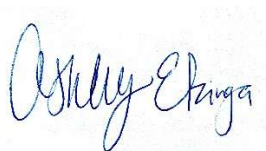
FPI’s would also like to make a few comments on the Statewide Recycling Lists Companion Document.

In 1.1 **Materials suitable for residential recycling collection**, reference is made to “materials identified as not suitable for residential collection.” FPI would encourage Ecology to be as comprehensive in their review as possible to ensure that collection services and thereby recovery of materials is not reduced in the state. Additionally, creating a process for defining exceptions and identifying pathways for those materials is critical.

Under 3.4.3 **Potential to cause contamination**, the statement that “Food service materials often bring contamination (food) into recycling” is of particular concern to FPI. As noted in FPI’s response to the Department’s Request for Information, FPI submitted three studies [attached with this submission] conducted with MRFs in different regions of the United States over a period of almost ten years. These studies found no appreciable differences in sortation, recovery, or processing between foodservice packaging and other commonly recycled food packaging products. A similar study conducted recently by the Sustainable Packaging Coalition also held similar conclusions.

Thank you for considering this feedback. FPI looks forward to continued collaboration as implementation progresses. We are hopeful that the forthcoming needs assessment will help identify additional opportunities to strengthen material recovery across the state.

Sincerely,

A handwritten signature in blue ink that reads "Ashley Elzinga". The signature is written in a cursive, flowing style.

Ashley Elzinga
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