



August 10, 2026

Washington State Department of Ecology
300 Desmond Drive SE
Lacey, Washington 98503

RE: Recycling Reform Act Preliminary Statewide Collection Lists

Dear Department of Ecology Team,

Thank you for the opportunity to submit comments on behalf of Upstream regarding the preliminary statewide collection lists for the Recycling Reform Act (RRA). Upstream is a US-based non-profit and leading change agency for the reuse movement in the US and Canada working towards normalizing reuse, growing and supporting the reuse industry, and creating an enabling policy environment for reuse.

We strongly support the goals of the RRA and recognize the considerable effort that has gone into compiling these statewide collection lists. Overall, we support Ecology's proposed lists, but do suggest one revision to strengthen the tracking and reporting of reusable packaging that will inevitably end up in the recycling stream.

Upstream suggests that for each material within each material class on the four lists, Ecology adds a subcategory to indicate if collected materials are reusable packaging. For example, under the Glass and Ceramic Packaging class on the Preliminary Residential Recycling Collection List, if a glass bottle is collected through the residential recycling system, there should be an option to mark whether or not this item is reusable packaging. Reusable packaging will eventually enter the recycling system, whether through consumer error or when it reaches its end of life.

Adding a "reusable" subcategory to the statewide collection lists would enable Ecology and CAA to more effectively track progress towards required reuse rate and return rate targets as well as streamline reporting by eliminating the need for a separate reporting process for reusable packaging. This approach would also provide valuable data on the types of reusable packaging being collected through the recycling stream and help identify where future investments in reuse infrastructure are needed the most. For an example, see Maine [Chapter 428](#), Appendix A: Packaging Material Types List.

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Thank you for the opportunity to comment on Ecology's preliminary statewide collection lists. For any questions, please feel free to contact melissa@upstreamolutions.org. We look forward to continuing to work with Ecology to support the incorporation of a strong reuse vision in Washington's packaging EPR program.

Sincerely,

Melissa Jung
Senior Policy Officer
Upstream