

Preliminary statewide collection lists, Recycling Reform Act (RRA) comments from Port of Seattle, SEA Airport

8/18/2026

Thank you for the opportunity to submit comments on WDOE's development of preliminary statewide collection lists under the RRA. The Port of Seattle supports the RRA's intent and appreciates WDOE's efforts implementing this significant legislation to improve, modernize, and expand WA's recycling systems through collaboration and oversight with packaging and paper product producers and other stakeholders involved in end-of-life material management.

General comment:

We encourage WDOE to align statewide collection lists with the RRA's intent to improve, modernize and expand WA's recycling and composting systems and increase statewide collection of covered materials from residential and public places with producer support and cooperation.

Developing collection lists with a progressive mindset focusing on RRA goals and a future-state Needs Assessment can identify current system gaps, collection challenges, and problematic materials while incentivizing producer investments in recycling systems, market development, and service provider expansion along with packaging redesign to meet anticipated performance targets.

On the other hand, limiting collection lists to only materials already successfully collected or excluding currently collected materials with perceived or moderately concerning challenges may hinder the Needs Assessment's ability to achieve intended goals and send appropriate signals to producers regarding necessary investments.

Similarly, taking a "lowest common denominator" or overly conservative approach to developing statewide collection lists based on current perceptions of recycling or composting system limitations anchored in current WA recycling systems or service availability in sparsely populated or rural WA communities could curtail potential producer investment in collection system improvements and responsible end-market development while discouraging successful collection of covered materials in urban or densely populated areas. By narrowly focusing on what's "safe" to collect today, WDOE may unintentionally hinder potential WA recycling system enhancements for tomorrow.

We recognize there will be tradeoffs and risks in developing key elements that shape the RRA and related outcomes. Therefore, we encourage WDOE to consider an appropriate balance of progressive and practical strategy in developing these lists to drive meaningful producer participation and achieve RRA goals with a view towards the future.

Specific comments:

Harmonize residential and public place collection lists

- We appreciate WDOE and the RRA Advisory Council's efforts to harmonize residential and public place collection lists to avoid confusion among WA residents regarding what can be recycled or composted at home and at eligible public places. The latest version of preliminary collection lists appears to embrace this concept while an earlier draft shared and discussed during the 7/22/2026 Advisory Council meeting did not.
- We recognize that distinct differences may exist between certain types of public places (e.g. parks, streets, transportation facilities) both in terms of scope and scale of generated materials and their managing entities' abilities to effectively collect and manage these materials. We encourage WDOE to consider these differences and potentially clarify guidance or define sub-lists appropriate for certain types of public places like transportation facilities that can demonstrate effective management of certain covered materials (e.g. certified compostable packaging).

Include certified compostable paper and plastic packaging, film (workbook material #68, #89, #9, #92, #59, #60) for evaluation on public place collection list

- We encourage WDOE to include these items for evaluation in the public place collection list or facility specific sub-list in addition to residential collection list and clarify what criteria or considerations will be used in the evaluation.
- Certified compostable packaging and products are currently used and collected for composting successfully at SEA airport (public transportation facility) through a long-term partnership with a local composting facility that accepts certified compostable products. Our intentional use of these products increases organics waste diversion for the travelling public at our region's busiest airport while simplifying sorting and reducing recycling contamination for the 52+ million travelers we serve annually. Paired with our primary focus on reusable dishware for sit-down restaurants, our use of certified compostable food service packaging reduces waste to landfill and enables 1,600 tons of organic material (63% food waste by weight) composting annually from SEA airport.

- The RRA clearly indicates that only covered materials included on the residential collection list will be eligible for producer reimbursements to service providers for the costs of managing these materials. However, the RRA is unclear whether excluding covered materials (e.g. certified compostable packaging and film) from the public place collection list would similarly prevent producer reimbursements and potentially disincentivize use of these materials through elevated producer fees determined through the eco-modulated fee setting calculations. We encourage WDOE to consider these implications in evaluations regarding inclusion of these items on the public place collection list, or creation of a potential sub-list for public places that can demonstrate successful collection and management programs, like SEA airport.