

August 19, 2026

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via electronic submission

Subject: HCPA Comments on Washington Preliminary Collection Lists

The Household & Commercial Products Association (HCPA)¹ appreciates the opportunity to provide input on the preliminary collection lists under Washington's 2025 Recycling Reform Act² put forth by the Washington Department of Ecology (Ecology). We look forward to continuing to work with Ecology to support a strong waste management system and a more circular economy in Washington.

Background

HCPA represents approximately 240 member companies engaged in the manufacture, formulation, packaging, distribution, and sale of products for household, commercial, institutional, and industrial use. HCPA members are continuously working to improve products and packaging in line with the principles of a circular economy to decrease waste and enable economic growth without greater resource use. Companies utilize several different materials for packing and shipping their products to ensure that products arrive undamaged, uncontaminated, safe for use, meet user expectations, have a lower environmental footprint, and generally enhance the quality of life of the consumers and workers who depend on these products daily. We have many members who sell products into Washington or otherwise have a presence in the state and are committed to ensuring that all residents have access to high-quality products with reduced environmental impacts.

In addition to representing various categories of formulated products, HCPA represents products packaged in the aerosol delivery form. The aerosol delivery form is used to dispense a wide range of products, including but not limited to adhesives, air fresheners, antiperspirant,

¹ The HCPA is the premier trade association representing companies that manufacture and sell \$227 billion annually of trusted and familiar products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 308,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives.

² Chapter 70A.208 RCW

asthma inhalers, body spray, cleaners, degreasers, deodorant, disinfectants, dry shampoo, hair spray, insect repellent, insecticides, lubricants, paints, pan sprays, sealant, shaving creams and gels, sunscreen, and whipped cream. HCPA has represented the U.S. aerosol products industry since 1950 through its Aerosol Products Division, which includes companies that manufacture, formulate, supply, market, and recycle a variety of products packaged in an aerosol form.

Aerosol Recyclability

HCPA appreciates the thoughtful approach Ecology has taken to evaluating each material category and Ecology's robust analysis of each criterion. We are concerned, however, that Ecology's preliminary list assignments inappropriately equate aerosols with pressurized cylinders, despite Ecology's own analysis highlighting several key differences.

Aerosols have a history of being accepted in curbside recycling systems throughout the U.S. (including in Washington and all Extended Producer Responsibility (EPR) states that have made "recyclable" lists to date), are used to contain a wide variety of common household products, are generally smaller than pressurized cylinders, and pose a much lower risk to recycling facilities. Pressurized cylinders, to HCPA's knowledge, have not historically been accepted at curbside in Washington's recycling programs or those of other EPR states.

The aerosol industry is seeking to have aerosol cans accepted in curbside recycling programs within packaging EPR frameworks, recognizing the high engagement rate of consumers with curbside programs and the value of a unified system for driving recycling improvements.

HCPA, in partnership with the Can Manufacturers Institute (CMI), launched the Aerosol Recycling Initiative³ in 2022 with the support of nearly 20 companies throughout the aerosol value chain with two goals for the U.S. market: increasing access to aerosol recycling and improving aerosol labeling to include instructions on how to recycle these products. Through this initiative, HCPA and CMI have been exploring the recyclability of aerosol containers, the environmental and economic benefits of recycling more aerosols, the real and perceived risks of accepting them for recycling, and actions the industry can take to move aerosol recycling forward.

HCPA previously described the activities of the Aerosol Recycling Initiative, including studies and results, in our comments on Washington's Request for Information to inform list development and so we will not reiterate them here. Instead, we will highlight specific concerns with Ecology's evaluation of aerosols and encourage Ecology to consult our past RFI comments for a more holistic perspective on aerosol recycling.

³ <https://www.thehcpa.org/Aerosol-Recycling-Initiative/>

Access:

HCPA is not clear on the source of the data for Ecology's statement that 77% of Washington does not have access to recycle aluminum aerosols. This would equate to 23% of Washington having aerosol recycling access. Relatedly, HCPA is confused by the statement that steel aerosols are assumed to have an unspecified low access rate based on "internal RRS data."

Washington's own data (local recycling program survey from July 2022) indicates that 35% of Washingtonians have access to recycle aerosols.⁴ This number is similar to other data on Washington state aerosol access that HCPA has seen from The Recycling Partnership (which includes steel and aluminum aerosols at 38% and 37% access, respectively).

HCPA is concerned that Ecology has cited a number substantively lower than other existing data for aluminum aerosols and has not included any number for steel aerosols. We recommend that Ecology be transparent about the data sources used to identify access rates and provide a clear rationale for why Ecology has elected to rely on a particular data source.

Compatibility:

Empty aerosol cans do not pose the same safety concerns as aerosol containers that still contain product. The safety concerns of the recycling industry and material recovery facility (MRF) operators generally stem from the potential for consumers to leave pressurized contents inside the containers before they enter the recycling stream, which can lead to issues during the sortation process. Other packaging EPR states such as California, Colorado, and Maine have recognized that empty aerosols are not likely to cause concern in the recycling system and that aerosol containers are currently collected in many communities via curbside comingled collection. With appropriate education and outreach, consumers can appropriately empty the cans such that they do not need to be treated as pressurized cylinders. MRFs do not require special equipment to manage empty aerosols.

Responsible End Markets:

Steel aerosols do not have material quality issues that prevent mills from accepting them. As described in a study by RRS that HCPA shared in our previous comments on Washington's RFI, there are no penalties, price downgrades, or rejections for steel bales that contain aerosols, and steel manufacturers are agnostic to plastic components that may prohibit recyclability in other products.⁵ HCPA is aware of a steel mill refusing to accept aerosols because the mill does

⁴ Local Recycling Program Survey (35% is calculated based on the total population of jurisdictions that said they accept aerosols for recycling, divided by Washington's population of 7.7 million in 2021).

⁵ Resource Recycling Systems. Surveying State of MRFs and End Market Barriers to Recycling Steel and Aluminum

Aerosols and Pet Food Cans and Identification of Solutions. 2021. Available at https://www.thehcpa.org/wp-content/uploads/2024/03/RRS_CMI_Results_Feb2021_FINAL.pdf.

not have a shredder, but this is an equipment problem with the mill, not a material quality issue with the aerosol can. HCPA recommends that Ecology be transparent about the source of statements that steel aerosols are considered lower material quality.

As described above, only *empty* aerosol cans should be advertised as accepted in the recycling system. Flammable residues are minimal with appropriate consumer education and outreach.

Yield Loss:

HCPA questions why steel aerosols are rated “moderate” for yield loss with no information or explanation given. As described in the above-mentioned RRS study, steel aerosols are combined with other steel before being sent to end markets.⁶ HCPA would not expect steel aerosols to have a substantively worse yield loss than other steel cans since they are processed together.

Harmonization:

HCPA notes that Maine also includes steel and aluminum aerosols as curbside recyclable on Maine’s statewide recyclable list.⁷ Both steel and aluminum aerosols are considered recyclable in all EPR states that have developed lists to date.

Design Guides:

HCPA agrees with Ecology’s assessment. HCPA is currently working on developing an aerosol-specific Design for Recycling guide for the U.S. but until that is complete, the Steel Container Design Guide for Recyclability from CMI is the most appropriate reference.

Identification and Preparation:

HCPA notes that separation of any steel from any aluminum requires a magnet (and separation of any aluminum from other materials requires an eddy current). The use of a magnet and eddy current are not identification steps unique to aerosol cans and aerosol cans should not be penalized relative to other metal packaging.

HCPA agrees that aerosols must be fully emptied (and thus depressurized) by the consumer in order to be acceptable in the recycling system.

⁶ Resource Recycling Systems. Surveying State of MRFs and End Market Barriers to Recycling Steel and Aluminum Aerosols and Pet Food Cans and Identification of Solutions. 2021. Available at https://www.thehcpa.org/wp-content/uploads/2024/03/RRS_CMI_Results_Feb2021_FINAL.pdf.

⁷ Code of Maine Rules, Chapter 428, available at <https://www.maine.gov/dep/waste/rules/index.html>

Unlikely to Cause Contamination:

HCPA believes the explanation for this criterion may inappropriately bucket steel and aluminum aerosols together. Aluminum aerosols typically end up in mixed aluminum bales, specifically those targeted for remelt scrap ingot (RSI) and deox end markets, as described in the above-mentioned RRS study.⁸ Sheet mills consider aluminum aerosols contamination as they prefer pure Used Beverage Can (UBC) bales, but RSI and deox producers do not have issues with aluminum aerosols. Steel aerosols typically end up in tinned can bales or scrap metal; they are not typically separated from other steel as steel mills are willing to accept a wider range of materials than aluminum mills.

Environmental Health & Safety:

HCPA agrees that aerosols must be fully emptied (and thus depressurized and without residuals of concern) by the consumer in order to be acceptable in the recycling system.

Through our joint Aerosol Recycling Initiative with CMI, HCPA worked with CAA and local governments in the Metro region of Oregon to support proper aerosol recycling practices and contribute to recycling education for Oregonians, with the aim of increasing the amount of empty cans received by MRFs (as opposed to cans with pressurized contents). CAA's RecycleOn Oregon website contains a specific page on "**How to Recycle Aerosols**"⁹ for the Portland Metro region. Metro is using messaging developed by the Aerosol Recycling Initiative on how to properly recycle an aerosol can: *Press It, Shake It, Recycle It!*

The Aerosol Recycling Initiative worked with CAA and Oregon MRFs to collect aerosol cans for testing both before and after the education and outreach campaign. The testing aimed to assess whether the campaign successfully increased the number of aerosols sent for recycling and lowered the amount of residue in the cans. While HCPA is still reviewing the results with our implementation partners in Oregon, the preliminary results indicate that the number of cans increased and the amount of residue decreased, as hoped for. We hope to have final results by the end of August.

CMI and HCPA would welcome the opportunity to share results and lessons from Oregon with Ecology and how engagement with CAA, MRFs, and local governments have improved consumer behavior to drive safe aerosol recycling.

⁸ Resource Recycling Systems. Surveying State of MRFs and End Market Barriers to Recycling Steel and Aluminum Aerosols and Pet Food Cans and Identification of Solutions. 2021. Available at https://www.thehcpa.org/wp-content/uploads/2024/03/RRS_CMI_Results_Feb2021_FINAL.pdf.

⁹ <https://recycleon.org/oregon/aerosols/>

Conclusion

HCPA appreciates the opportunity to provide input on Ecology's preliminary collection lists for Washington's packaging and paper EPR program. We appreciate the care that Ecology is taking to solicit stakeholder input. HCPA looks forward to continuing to engage with Ecology to support successful implementation of Washington's Recycling Reform Act. We invite any questions about this submission and look forward to Ecology's response.

Sincerely,

A handwritten signature in black ink, appearing to read "Molly R. Blessing".

Molly R. Blessing
Vice President, Sustainability & Product Stewardship