

## Carton Council (Brendon Holland)

Thank you for the opportunity to provide comment regarding the preliminary statewide collection lists. Our full comments are attached. We look forward to future communication and collaboration.

TO: Washington Department of Ecology  
(via online form at <https://ecology.commentinput.com/?id=UbJksKTgh>)

RE: Carton Council Comments Regarding Preliminary Statewide Collection Lists

DATE: August 19, 2026

Dear Washington Department of Ecology:

The Carton Council is composed of four leading carton manufacturers – Elopak, Novolex, SIG, and Tetra Pak. Formed in 2009, the Carton Council works to deliver long-term collaborative solutions to divert valuable cartons from the landfill.

The Carton Council would like to offer comments regarding the preliminary lists document made available to the public on August 5, 2026, at <https://fortress.wa.gov/ecy/ezshare/SWM/RRR/StatewideListsForPublicComment8-3-2026.xlsx>. The Carton Council appreciates the work that has gone into this evaluation and supports the recommendation of the Advisory Council to include food and beverage cartons (Material #12 and #13) on the Residential Recycling List and the Public Place Recycling List. The following comments are provided in reference to the Evaluation + List Assignment tab of the document:

1. **Access rating factor and key notes** (cells H15 and I15 (aseptic cartons) and H16 and I16 (gable top cartons)). These cells indicate that for both types of cartons the recycling access rate is 25%, which results in assigning a rating of “challenging.” [The Statewide Lists Companion Document](#) indicates that the “RRS Program Access Database (Note: not accessible by the public)” would be one resource used for this access evaluation. The RRS Database, which includes a Carton Council database module, indicates that 48.7% of Washington households have cartons recycling access. The Carton Council also provided this figure to Ecology and the consulting team as part of our response to the RFI submitted on May 8, 2026. In our RFI response we also stated that Ecology’s database may be out of date and does not appear to be accurate regarding current acceptance of cartons for recycling in the state. It appears that RRS’ data was not used for this evaluation, at least for cartons, and it appears that the Carton Council’s RFI comments may not have been

consulted for the purposes of this evaluation either. We request that up-to-date data be used and accordingly, that the ratings be adjusted upward for cartons.

2. **End Markets** (cell L15-L16) rate aseptic cartons' end markets as "concerning" and gable top end markets as "moderate." Both types of cartons are equally accepted by end markets that accept cartons and both should have the same rating. The end markets notes do not seem to justify different ratings for each carton type.
3. **Harmonization with other states implementing EPR** (cells P15 -Q15 (aseptic cartons) to P16-Q16 (gable top cartons)). Cell Q16 notes that the two variations of cartons (aseptic and gable top) are combined in all EPR states except for California. CalRecycle has, for undisclosed reasons, elected to maintain a distinction between the two variations on its CMC List (we believe it is simply for legacy reasons as CalRecycle has gathered differentiated waste composition data between the two types for the past 20 years). CAA, in its June 2026 draft California Program Plan, proposes to combine both aseptic and gable top cartons into a single material grouping of "cartons." As we stated in our RFI response submitted on May 8:

"Any belief that food and beverage cartons are collected, sorted, marketed, or recycled separately from each other, or have any differences in recyclability, is based on outdated information. Keeping cartons in a single category reduces consumer confusion, boosts recycling collection efforts, and supports cross-state harmonization."

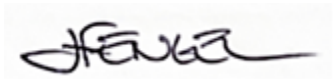
The Carton Council requests that Washington combine Material #12 Aseptic Containers and Material #13 Gable Top Containers into a single category of "Food and Beverage Cartons" for this evaluation. Cartons are collected, sorted, and marketed together and consumers are often unable to discern the difference between aseptic and gable top cartons. There is no need to separate them into two distinct material categories.

4. **Adherence to design guidelines for recyclability** (cells R15-S15 and R16-S16). The vast majority of North American cartons adhere to the Carton Council's design guide for recyclability. The quote from AF&PA's design guide left out the bolded sentence below, which we believe is important to include: "33% or more of respondents rated this non-fiber element as a challenge in mills. **Being a challenge does not make something not recyclable.**" Furthermore, as paper mills modernize

their pulping and pulp cleaning systems, less mills will find poly coatings on cartons to be challenging.

Thank you for considering the Carton Council's comments as you continue with your thoughtful deliberations of Washington's collection lists.

Sincerely,



Jordan Fengel,  
Executive Director, Carton Council