

# Pierce County Solid Waste (Chris Brown)

## Public Comment Statement

Pierce County appreciates the opportunity to provide input on the preliminary list of accepted materials under the Recycling Reform Act (RRA). We understand that in order for any material to be collected statewide by the PRO after the program launch in 2030, it must be included on the preliminary list so it can be evaluated through the needs assessment process.

Pierce County has historically limited its recycling program to materials that can be reliably collected, sorted, processed, and sold to stable end markets. Many materials that are technically recyclable are not recycled in practice due to high collection costs, sorting challenges, limited or nonexistent markets, or insufficient material value to justify processing.

We support the long-term goal of expanding statewide recycling, especially as RRA investments strengthen Washington's recycling infrastructure. However, several materials on the preliminary list present concerns at this stage.

We encourage the Department of Ecology to establish clear best practice standards and thoroughly evaluate end market viability before finalizing statewide collection requirements.

## Items of Concern

### Metal Packaging

- Aluminum and bi metal food packaging (e.g., foil, pie plates, pet food cans): Concerns related to food contamination and unclear markets separate from aluminum UBC bales.

### Paper Packaging

- Gable top containers: A responsible end market assessment is needed. Reliance on a single local outlet may not support statewide inclusion.
- Aseptic containers: End market stability remains uncertain.
- Polycoated fiber food packaging (e.g., cups, bowls, ice cream tubs): Significant concerns regarding contamination of other materials.

### Rigid Plastic Packaging

- Lids vs. caps: Differentiating lids over 2 inches from caps will create consumer confusion, especially given widespread "Recycle with Caps On" messaging.
- PET other containers (e.g., clamshells): While tolerated in limited quantities, statewide inclusion could overwhelm current end market pathways.
- #5 PP other packaging and food serviceware (e.g., cups, plates): End market viability must be demonstrated.

Pierce County is committed to working collaboratively to ensure responsible, sustainable, and practical statewide recycling outcomes under the RRA. We urge Ecology to carefully assess these materials and their markets before finalizing collection requirements.