

KC SWD Comments

General comments:

- We submit the following comments recognizing how these lists should help guide development, and with the understanding that it will evolve based on upcoming needs assessments, i.e., by including items on the lists, the costs of collecting and recycling them will be evaluated in the needs assessments.
- We recognize that feedback is tied to what MRFs accept, and outreach to the general public will look different.
- Please clarify the next steps in the process for evaluating materials that are covered under RRA that are currently marked as “needs further evaluation.”
- We support the Residential Composting list being guidance rather than a mandatory requirement.
- There is an inconsistency between the spreadsheet and the memo: EPS and shredded paper appear in the spreadsheet under Alternative or Multi-mode Collection list but are not included in the memo. Please clarify whether these items are intended to be part of the list.
- Collecting recycling in public spaces can improve convenience and capture more materials, but it also potentially presents challenges. Sites that only accept bottles and cans may have lower contamination because the guidelines are simpler and familiar to the public. If public space collection lists are expanded to mirror residential programs, the potential for contamination from food waste or non-recyclables could increase. Given these trade-offs, we are looking for a more detailed explanation of the benefits of aligning public places and residential collection lists, as well as evidence that supports why they should be similar. We appreciate all the research and work that has gone into the development of the list and evaluation of the individual materials and request further documentation highlighting clear rationale and data on the benefits and risks of the public places and residential lists being the same.
- This proposal for statewide collection lists has so far evaluated items individually, but it would benefit from a holistic approach. For example, if glass is recommended for separate collection, it could be useful to also examine scenarios where paper and cardboard are collected separately while glass is combined with plastic and metal. These materials are often contaminated by food and liquids and evaluating them together might reveal ways to reduce cross contamination from mixed paper and containers. A broader system level perspective could help illuminate these tradeoffs. A comprehensive lifecycle assessment from the European Commission’s Joint Research Centre found that single-stream collection of all recycles tends to produce negative environmental and economic impacts, whereas systems separating paper and cardboard from glass, metal, and plastic containers can deliver comparable performance at potentially lower cost and contamination risk (source: <https://publications.jrc.ec.europa.eu/repository/handle/JRC136657>).

TYPE OF COMMENT	SECTION	PROPOSED ITEM	PROPOSED CHANGE	COMMENT
Technical	Residential/ Public Spaces	Glass Bottles	None at the moment – pending more information	<i>Quality of the glass is lessened when collected in comingled system, reducing recyclability.</i>
Technical/ editorial	Residential/ Public Spaces	#1 PET Lids >2” #2 HDPE Lids and Handles >2” #2 PP Lids >2”	None at the moment – pending more information	<i>Currently the MRF sorting system accepts items 3” or larger, smaller items are collected as residuals and landfilled. For clarification if these are accepted only when attached to a plastic bottle this needs to be specified. Metal lids are also not included on the lists, currently many jurisdictions collect metal lids >3”.</i>
Technical	Alternative	Other Ferrous Packaging	Include on Residential list	<i>This includes cookie tins which are commonly accepted in residential. It should not include paint cans as they are not covered products. Maybe the category should be split up differently to not include food packaging and HHW.</i>
General	List Not Included in Memo	Coated Corrugated Cardboard, Composite Paper Packaging, Natural Fiber Textile Packaging, and	None at the moment – pending more information	<i>For covered items that have existing collection or drop-off options but are marked “Not Listed for Collection”, in the spreadsheet, will they be</i>

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		Synthetic or Composite Textile Packaging		<i>included in the needs assessment and potentially added to the list later? If not, why?</i>
General	List Not Included in Memo	All items	None at the moment – pending more information	<i>Please provide broader clarification on rules that apply to all items on the list, such as accepted levels of food contamination and size restrictions like the “3-inch rule,” meaning items must be at least three inches in diameter.</i>