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Attached comments for WRRRA.



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WRRA Statewide Residential Recycling Collection List Comments

General Statewide List Comments

- (1) End Markets:** A material is only truly recyclable if there are reliable buyers or processors willing and able to accept it. End markets must have sufficient capacity to handle the volume of material generated by the recycling system. Those end markets often have specific quality requirements that determine whether a material can actually be sold and a material being tolerated in a bale does not necessarily mean it has a viable end market. Materials that are technically recyclable may become unmarketable when contamination makes the finished product fail buyer specifications. Statewide collection lists should consider whether end markets are stable enough to support consistent collection over time and the impact that one material may have on bale quality.
- (2) Practical Considerations on MRF Equipment, Funding, & Timing:** The RRA is intended to expand and improve Washington's recycling system using producer funding. Expanding Washington's recycling processing capability in keeping with the intentions of the RRA will require significant producer investment. However, producer funding will not flow until full implementation of the first PRO plan in 2029 at the earliest. Expansions or investments in recycling processing capability before 2029 will be ratepayer funded, not producer funded. The statewide list should make decisions based on what processing capacity is expected in 2029 before producer funding begins. Future iterations of the list will have the benefit of producer investments in existing infrastructure to potentially expand the list and collect more items.

Glass

- WRRA supports including glass on the statewide residential curbside recycling list.
- The approach to glass discussed by the statewide list subcommittee appropriately provides flexibility by not prescribing a specific collection method, allowing the advisory council to continue to evaluate systems that best fit operational conditions through development with the PRO plan.
- Maintaining flexibility allows communities to continue using either commingled or separate glass collection where appropriate.
- Significant investments may be needed to capture glass in mixed streams. As discussed above, producer funding for said investments will likely not flow until the first Pro-plan implementation in 2029.

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- Glass Challenges generally
 - Glass is significantly heavier than other recyclables, increasing collection, transportation, and processing costs as well as higher greenhouse gas emissions from transportation.
 - End markets for recycled glass are regional and can fluctuate, making transportation a significant factor in market viability and environmental impact.
 - Collection programs should account for infrastructure and available end markets to ensure environmentally and economically sustainable recycling.
 - Some jurisdictions successfully collect and process glass commingled while others collect separately at the curb or drop-off

Gable Top & Aseptic Containers

- WRRRA recognizes the desire to recover these materials but notes significant operational and market challenges, many of which the industry identified during Oregon's RMA implementation process.
- Gable Top & Aseptic Containers Challenges:
 - Low generation volumes make it difficult to accumulate economical shipment quantities and limited domestic end markets reduce consistent recycling opportunities.
 - Many material recovery facilities (MRFs) are not equipped to efficiently identify and sort these cartons without additional technology or processing costs. Cartons are frequently captured with paper but require specialized downstream processing that is not universally available.
 - Food residue and contamination are common with this packaging and can reduce recovery rates and increase processing costs.
 - Inclusion on the statewide initial list should be tied to demonstrated current and projected processing capacity by program implementation in 2029 and sustainable domestic and international end markets and consider that producer funding necessary for additional investments in collection and processing will not flow until after program implementation in 2029.

Plastic Cups

- PP#5 plastic cups are captured through optical sorting if #5 is currently a program material. PP#5 cups generally have sustainable end markets.
- Cups are not all the same and PET#1 cups can result in contamination with PET#1 bottle bales.
- However, some Washington MRFs with upgraded state-of-the-art recycling facilities have optical scanners and intelligent sorting equipment. With new, advanced sorting technology in place, these MRFs are able to handle these cups more efficiently and meet the growing demand for these recycled materials.

Paper Cups (Coated and Uncoated)

- Some WRRRA members support accepting paper cups and have invested in processing systems capable of recovering them.
 - Paper cups are frequently contaminated with food and beverage residue, reducing recovery efficiency.
 - Volumes remain relatively low compared to other fiber grades, limiting market efficiency.
 - Paper cups, like cartons, will be sorted into mixed paper bales. Some cups are uncoated and other cups are poly coated, which can affect market availability if polycoated materials are mixed with non-coated materials.
 - *ReMA's ISRI [Inbound specs](#) have also been updated to allow for these materials in both [polypropylene bales](#) and [mixed paper bales](#) but greater understanding about end-market tolerance for polycoated materials through the Needs Assessment is likely helpful and necessary.*

Poly-Coated Paper (Other than Paper Cups)

- WRRRA distinguishes poly-coated paper packaging from paper cups because it includes a broader range of products with varying fiber content, plastic coatings, and product designs.
- Poly-Coated Paper Challenges:
 - Many poly-coated paper products contain heavier plastic coatings, multiple material layers, or additives that make fiber recovery more difficult than for standard paper products.
 - These materials are difficult for MRFs to accurately identify and sort from conventional paper streams.
 - Mixed poly-coated paper can reduce the quality of recovered fiber when not effectively separated.
 - Inclusion on the statewide list should be supported by demonstrated recycling infrastructure and economically sustainable markets.

Thermoforms #1 PET Clear containers

- Additional study during the Needs Assessment may be necessary regarding responsible end markets, market tolerances, and PET thermoform impacts on PET beverage container bales.
 - Flat, lightweight shapes can be difficult for MRF screens and optical sorters to distinguish from other plastics or contaminants. Trays and clamshells can fall through screens, become trapped with paper, or bypass intended sorting pathways.
 - Food residue, labels, adhesives, and mixed-material components can be common and reduce the quality of recovered PET and result in contamination in PET bales.
 - Recovered thermoform PET can face quality specifications and limited demand compared with PET bottle flake.

Alternate Collection Lists Generally

- At the August 4 Statewide List Subcommittee meeting, discussion suggested that the **Alternate Collection List** may be limited to only those materials for which producers submit a petition to establish an Alternate Collection Program.
- WRRRA believes this interpretation is too narrow. Instead, the Alternate Collection List could be viewed more broadly as the **drop-off collection list** for materials that are not appropriate for curbside collection.
- Conceptually, there are only two methods for collecting recyclable materials under the Recycling Reform Act:
 - **Point-of-generation collection**, through the curbside collection program (curbside list, public place list); or
 - **Collection at another location**, where residents bring materials to a designated drop-off or alternate collection site (alternate collection list).
- For that reason, the Alternate Collection List could be viewed as the statewide **drop-off list**, identifying materials that have viable and sustainable end markets but are not effectively or efficiently collected through curbside recycling (as well as other materials on the residential recycling list).
- Materials should be assigned to the collection method that best supports high-quality recycling, minimizes contamination, and makes the most effective use of existing infrastructure, rather than limiting alternate collection solely to petitioned programs.
 - The full advisory committee voted on 8/13 to consider expanding the alternate collection list to consider additional materials and the vote received a majority.
- **Plastic film** is a clear example. Although it has established recycling markets when collected separately, plastic film is not well suited for curbside collection because it wraps around sorting equipment, increases contamination, creates operational challenges MRFs, and increases processing costs. Collecting plastic film through dedicated drop-off locations is a more effective and efficient approach that produces cleaner material while avoiding these impacts on curbside recycling systems.

For questions or follow-up please contact Rod Whittaker, In-House Counsel & Policy Advisor for WRRRA at rod@wrra.org