

Lautenbach Recycling (Carolyn Moulton)



Submitted to: Washington State Department of Ecology

Re: Preliminary Statewide Collection Lists

Date: August 19, 2026

Thank you for the opportunity to comment on the Preliminary Statewide Collection Lists. As a recycling company operating within Washington's existing system, we encourage Ecology to ensure the list includes only materials that are compatible with current processing infrastructure and supported by stable and consistent end markets. The list should reflect materials that are currently successfully recycled rather than those that may become viable under future market expansions or major infrastructure upgrades.

Several materials proposed for inclusion present significant challenges, including gable top containers and other coated fiber products. Ecology's evaluation identifies concerns related to limited statewide collection access, processing infrastructure, end-market availability, and anticipated yield loss. While infrastructure and markets may continue to evolve, statewide lists should be based on existing operational capacity and current market realities.

There appear to be inconsistencies in how the evaluation criteria were weighed and applied. For example, shredded paper is excluded from the statewide collection list because approximately 77% of Washington residents lack access to recycling it and it can contaminate other material streams. In contrast, gable top containers are recommended for inclusion even though the evaluation found that only 25% of residents have access to recycling them and identified concerns regarding limited processing capacity and end markets. We encourage Ecology to more clearly explain how collection access, infrastructure readiness, and responsible end markets will be balanced when determining the final list.

If materials are added to the list before sufficient infrastructure exists to manage them effectively, the resulting influx of hard-to-recycle materials could increase system costs and contamination, potentially leading to more material being discarded rather than recycled into new products or packaging and further undermining public trust in recycling.

Establishing a list based on proven performance will help increase public confidence and reduce the risk of "wishcycling."

We are concerned that efforts to harmonize Washington's list with Oregon's or those of other states may result in the premature inclusion of materials whose collection, processing, and end-market viability have not yet been demonstrated at scale. Oregon's EPR program is in its infancy, and performance data regarding capture rates, contamination, system costs, and end-market outcomes are still developing.

In addition, we recommend clarifying several material categories before the final list is submitted on October 1st. Broad categories such as "Other Coated Fiber," "Polycoated Fiber Food Packaging," "Other Uncoated Paper," and "Low-Grade Paper Products" may be interpreted differently by producers, MRF operators, and residents. More precise material definitions and clearer distinctions between acceptable and unacceptable formats will provide greater certainty for all participants in the recycling system.

Ultimately, the statewide collection lists should be evidence-based, infrastructure-based, and market-based. Requiring a strong connection between collection requirements, operational realities, and responsible end markets will reduce contamination, increase public confidence in Washington's recycling system, and support long-term program success.

Thank you for considering these comments.