

Caitlin Newman

Kitsap County's comments are attached.

Preliminary statewide collection lists, Recycling Reform Act Comments from Kitsap County Solid Waste Division

Workbook

- Some non-covered materials are included (food waste) in the Workbook, while others are not (newspaper). The Companion Document explains why newspaper was included in the Revised Candidate Material List but not why it's excluded from the Workbook. Should newspaper be added to the Workbook to ensure it can be continue to be collected in Residential Recycling programs? (The definition of newsprint excludes newspaper.)
- In the Materials Evaluated tab, the column titled "Non-Covered or Exempt Materials Description" is somewhat confusing. Instead of using the term "includes" in this column, would it be helpful to say "excludes?"
- Ecology's 7-7-2026 Designated Recyclables List recommends against curbside recycling collection of the following materials:
 - Cartons: aseptic and gable top
 - Paper cups
 - Polycoated paper and packaging
 - Plastic cups
 - Plastic tubes
 - Bulky rigid plastics
 - PET thermoforms
 - Blister packs
 - Rigid plastic containers (commonly called #3-#7)
 - Plastic tub/container lids
 - Plastic plant and flower pots
 - Multimaterial flexible packaging

Many of these materials, however, are included on a preliminary list. How can these differences be explained, and how will these separate lists be reconciled between now and 2030 when the RRA goes into effect?

Companion Document

- Define the acronym DRS.
- Section 3.1, paragraph 2: "Error! Reference source not found"

- Include reference to RCW 70A.208.090(4) in Section 1.0 “Any covered material not included on the residential recycling list may not be collected through a residential recycling program, with some exceptions for pilot programs” and Section 1.1, “A material that is not identified as suitable for residential collection may not be collected as part of a residential recycling program, with some exceptions.”
- Instead of having a separate “Summary of the Preliminary Statewide Collection Lists” document, refer to the Executive Summary of the Companion Document.
- Section 3.0 Evaluation Criteria explains that each material was evaluated on multiple criteria and assigned a ranking of Strong, Moderate, Concerning, and Challenging. However, it does not explain exactly *how* these rankings were combined to determine each material’s inclusion or exclusion on the preliminary lists.

The document titled “Summary of the Preliminary Statewide Collection Lists” does a better job of explaining the methodology when it says, “*Preliminary list assignments reflect the project team's technical judgment based on the collective weight of the available evidence—not the outcome of a single criterion or numerical score. Rather than applying every criterion equally, the evaluation placed greater emphasis on factors most critical to successful management within Washington's recycling and composting systems, such as responsible end markets, infrastructure compatibility, and anticipated yield loss. As a result, 3 materials with similar criterion ratings may receive different preliminary assignments based on the overall balance of evidence.*”

Please add this important explanation to the Companion Document.