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BSH Home Appliances Corporation, 1901 Main Street, Suite 600, Irvine,
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Washington Department of Ecology
Via web:
https://ecology.commentinput.com/?id=QbChArB7j&utm_medium=email&utm_source=govdelivery

Regarding: BSH Home Appliances Corporation Written Comments on Washington's Preliminary Needs Assessment

Dear Washington Department of Ecology:

BSH Home Appliances Corporation ("BSH") appreciates the opportunity to comment on Washington's Preliminary Needs Assessment under the Recycling Reform Act. We support efforts to improve packaging recovery and recycling, and our comments focus specifically on considerations relevant to the home appliance sector.

We encourage Ecology to address the following issues as it develops the full needs assessment.

**1. Clarify How Appliance Packaging Is Handled and Classified**
*Draft assessment: Sections 3.2.1–3.2.2, pages 13–15*

Protective packaging for major household appliances—including refrigerators, freezers, dishwashers, cooking appliances, clothes washers, and dryers—often includes expanded polystyrene (EPS) foam blocks, plastic film and plastic straps. Molded EPS components are engineered to protect heavy, high-value products against impact, vibration, and damage during storage and transportation. This packaging serves an important product-protection function and helps prevent damage that can result in product replacement, additional transportation, and unnecessary waste. This packaging is frequently removed by a retailer or delivery and installation provider before the appliance reaches the consumer's home.
Once sold to a retailer, manufacturers cannot track what happens to this packaging. Some may be collected for recycling through commercial channels; other material may enter different waste streams. Manufacturers do not have information to determine how much follows each path.
**This creates two important questions: Where does the packaging go, and is it considered a covered material under the Recycling Reform Act?** BSH asks Ecology to clarify how appliance packaging is treated when it is removed in a commercial setting and whether its handling or recovery pathway affects its status under the law.
The Needs Assessment should recognize these information gaps rather than assume that all appliance packaging enters the residential recycling stream or is automatically exempt.

Understanding both its legal status and its actual destination is essential to determining the appropriate collection and recycling approach.

**2. Evaluate EPS Recovery Based on Real-World Handling**
*Draft assessment: Sections 6.0, 8.3.1, and 10.3, pages 37–47, 63–64, and 72*

EPS foam blocks are widely used to protect major household appliances during transportation and delivery. EPS size and weight can make its storage, collection, transportation, and processing challenging. These characteristics differ from those of many common household packaging materials.
The assessment reports approximately 2,043 tons per year of recovered polystyrene and EPS in Washington. However, this figure includes both packaging and non-packaging materials and does not establish how much appliance EPS is recovered.
BSH recommends that Ecology distinguish appliance EPS from other polystyrene materials where data are available and evaluate the practical requirements for collecting and recycling it. This should include where the material is generated, whether it can be kept separate and clean, how it can be transported efficiently, and whether suitable processing (such as densification) is available.
Collection convenience should be evaluated in the context of how this material is generated and handled commercially—not solely by whether residential curbside or drop-off services are available.

**3. Validate Cost Estimates Before Using Them to Guide Producer Fees**
*Draft assessment: Sections 4.1, 4.2.2, and 10.1, pages 21–23 and 72*

The assessment estimates recycling service costs at approximately $432 per ton but acknowledges that confidence in this estimate is low because of limited data and inconsistent cost definitions.
BSH recommends that Ecology improve the underlying cost data before using these estimates to guide future program costs or producer fees. Where possible, the analysis should distinguish among residential, multifamily, and commercial collection; identify which activities are included in reported costs; and account for revenue from recovered materials.
A clearer and more consistent understanding of costs will help ensure that producers fund appropriate, documented recycling activities and that costs are not counted more than once.

**4. Address Data Gaps by Engaging the Businesses That Handle Packaging**
*Draft assessment: Sections 3.4, 7.2.2, 8.3.7, and 10.4, pages 20, 50–51, 68–69, and 72*

The assessment acknowledges limitations in the available data. For example, only three of seven surveyed material recovery facilities responded, and reported information was not

independently verified. The assessment also notes gaps in information about facility capacity and end markets.
For appliance packaging, important information may sit with retailers, delivery and installation providers, commercial waste haulers, processors, and recycling end markets—not with appliance manufacturers alone.
BSH recommends that Ecology engage these stakeholders as it develops the full needs assessment. The goal should be to understand where appliance packaging is removed, how it is managed, what quantities can realistically be recovered, and what prevents additional recycling. Where businesses cannot readily track packaging after it leaves their control, Ecology should recognize that limitation and develop a practical approach to improving the data. Commercially sensitive information should be protected through appropriate reporting methods.

**Closing**
BSH supports Washington's efforts to improve packaging recovery and recycling. A successful program, however, must reflect the different ways packaging is generated and managed across the supply chain.
We encourage Ecology to clarify the treatment of appliance protective packaging, distinguish residential and commercial handling pathways, and work with the businesses that manage these materials in practice. These steps will help ensure that the full needs assessment supports practical, measurable, and cost-effective improvements in packaging recycling.

Thank you for considering BSH's comments. We appreciate DOE's work to implement Washington's Recycling Reform Act and encourage a practical, evidence-informed approach to protective appliance packaging that accounts for how this material is generated, handled, and collected in real-world settings.

Sincerely,

AliciaMCafferty

Alicia Cafferty
Head of Government Relations
BSH Home Appliances Corporation

Background
BSH Home Appliances Corporation (BSH), headquartered in Irvine, California, produces and markets small and major home appliances that are known for their high-quality and superior innovation. BSH sells its Bosch, Thermador and Gaggenau branded appliances throughout North America, through distributors, independent appliance dealers, national and regional retailers, builders and large buying groups. BSH supports efforts to protect our environment and accepts a responsibility in building a sustainable future for all.