Recycle Across America Comments on the Draft Preliminary Needs Assessment

To: Washington State Department of Ecology, Recycling Reform Act team
From: Recycle Across America (RAA)
Date: Oct 23, 2026

Thank you for the opportunity to comment on the Draft Preliminary Needs Assessment. Recycle Across America is a 501(c)(3) nonprofit that created the society-wide standardized labels for recycle, compost, and trash bins, carts, and dumpsters.

The draft is a thorough and useful baseline. Our comments respond mainly to Question 3 (what the full needs assessment should consider), with a related note on Question 2 (public places). Our core point is simple: the container colors Washington has adopted are an important foundation, and a standardized label format on those containers is what will let residents and visitors act on the statewide collection lists.

1. Colors tell people which bin. Labels tell them what goes in it.

Under RCW 70A.205.750, recycling containers will be blue, organics green or brown, and garbage gray or black, and containers must carry a clear and conspicuous label by January 1, 2028. While color gives people a fast first signal, it cannot tell them which materials a bin accepts.

The law sets minimum label content but not a standardized methodology for bin labeling. As jurisdictions and haulers work toward the 2028 deadline, Washington could end up with many different label designs on correctly colored bins, causing the public to need to relearn how to recycle right each time they walk up to a bin.

2. Standardized labels are the public-facing companion to the statewide collection lists

The draft notes that "the statewide collection lists will create a standardized list of packaging and paper products for collection, regardless of location." A standardized bin label format carries that same importance because it is the primary source of information that people rely on at the point where they interact with recycling: the bin.

Traffic signs are the best comparative analogy in this instance. A driver can go from Washington to Oregon and read and understand every stop sign, yield sign, and speed limit sign instantly. Driving is more complex than we realize, because the rules of the road change constantly. Speed limits change, lanes change, and local rules change. What makes driving safe and effective is the standardized signage: the shapes, colors, and layout follow one national standard, so drivers can take in the information at a glance and act on it. Standardized labels for bins, carts, and

dumpsters work the same way. The format stays consistent everywhere, and the materials shown on each label match what that program accepts. People learn the system once and can recycle correctly at home, at work, at a trailhead, or in a town they're visiting for the first time.

Rhode Island is the perfect example of why this matters. The Rhode Island Resource Recovery Corporation's (RIRRC) materials recovery facility processes 100% of the state's municipal mixed recycling, and the state has run a single statewide single-stream program since 2012, so everyone shared one accepted materials list. Even so, contamination reached an all-time high. In Providence alone, RIRRC inspectors rejected more than 12,000 tons of recycling in 2015, roughly 40% of what residents set out. An earlier awareness campaign without standardized labels produced a 9% decrease in MRF-rejected tons. In 2016, Rhode Island became the first state to adopt the standardized labels, placing them in public schools, municipal buildings, and public spaces, along with matching education and outreach materials. RIRRC's 2018 SWANA Gold Excellence Award entry documents an 18% decrease in MRF-rejected tons from April through November 2017 compared with the same months in 2016, twice the reduction of the earlier campaign. This highlights that while a single accepted materials list is an important step, the standardized labels at the bin are what help people recycle right.

3. Visitors, new residents, and public places

People don't recycle in just one place. In a single day, a Washington resident might use bins at home, at work, at their kid's school, and at a park, often in different jurisdictions served by different haulers. In each of those places, people rely on the instructions at the bin in front of them, which is why it's so important for there to be standardized bin labels that are consistent when they move from one place to the next. Standardization prevents the need to relearn how to recycle. This matters most in public places such as streets, parks, beaches, and trailheads, where the people using the bins are the least likely to know local rules.

4. Recommendations for the full needs assessment

Contamination - When assessing the level and causes of contamination, we recommend examining container labeling as a factor. This should include how label practices differ across jurisdictions, and how contamination compares in places that use the society-wide standardized labels versus places that use their own label designs.

Education and outreach best practices - The full needs assessment must evaluate best practices in public education, outreach, and behavior change, including the use of product and packaging labels. We recommend this evaluation include the standardized labels on collection containers, since the bin is where the sorting decision happens. The standardized labels presented during Ecology's labeling best practices webinar are already in use in national parks, airports, schools, stadiums, and businesses across the country, and the results from those places offer a ready evidence base for this evaluation.

Labels as part of collection service - Haulers that provide containers will already need to label them by January 1, 2028. We recommend the full needs assessment to evaluate the costs and practical options for haulers to provide the standardized labels as part of their service, so every container haulers provide meets the 2028 requirement using the standardized labels to prevent confusion for the public. This should include how those costs are treated in collection contracts and in the reimbursement methodology. Because many contracts run about ten years, contracts signed or renewed now are a timely place to align label requirements.

Culturally responsive materials - The full needs assessment must evaluate education and outreach practices that account for culturally responsive materials and methods, and the labeling law encourages multiple languages. The standardized labels use visuals to show what goes in each bin, which helps people sort correctly regardless of the language they read. We recommend evaluating the image-based standardized labels alongside standardized labels with images and translated text.

Long-term consistency - We encourage the full needs assessment to consider a single statewide standardized label format, such as the society-wide standardized labels, and how it would be maintained over time, so the public-facing message stays consistent and in the public interest as programs, contractors, and funding arrangements change.

5. Keeping the public-facing message independent

The Recycling Reform Act already builds in an important safeguard: the needs assessment itself must be conducted by a third party "who is not a producer, a producer responsibility organization, or a member of the advisory council." We encourage Ecology to apply the same principle to the labels and core recycling messages people see at the bin.

Under the law (RCW 70A.208.190), the PRO must implement education and outreach activities, and Ecology's labeling guidance notes that the PRO may also provide label templates for the state. The PRO is funded and governed by the producers whose packaging the program regulates. Nonprofit status alone does not resolve this. Some nonprofits active in recycling education receive substantial funding from packaging producers and petrochemical companies, and include representatives of those companies on their boards. Their messaging carries the same tension. This is not a question of anyone's good faith. It is a structural conflict of interest, and it is easier to design around now than to correct later.

We recommend the full needs assessment evaluate how statewide labeling and core recycling messaging can be set and maintained independently of regulated producers, the PRO, and organizations funded or governed by packaging and petrochemical companies. Producer funding can still support printing, distribution, and outreach, while decisions about what the

labels and messages say rest with a party independent of the producers and industries the program regulates.

RAA developed the society-wide standardized labels as an independent, public-interest solution for this very reason, free from the influence of the industries that produce or profit from the materials being regulated, including the petrochemical industry.

6. How we can help

About 15 million standardized labels are in use across the country. They're in communities, national parks, hospitals, schools, airports, stadiums, and businesses. We are glad to share examples, case studies, and implementation experience with Ecology and its consultant team, and to support local governments and haulers.

Thank you again for the careful work behind this draft and for the open, collaborative way Ecology has approached this process. We look forward to continuing to work together.

Sincerely,

Brittany LeTendre
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