October 30, 2026

**RE: Northwest Grocery Retail Association – Public Comment: Washington Preliminary Needs Assessment – Draft Report**

Department of Ecology:

The Northwest Grocery Retail Association (NWGRA) appreciates the opportunity to comment on Washington's draft preliminary needs assessment. NWGRA represents chain, family-owned, and independent grocery retailers throughout Washington, Oregon, and Idaho, including more than 455 member store locations employing over 66,000 people in Washington.

Many of our grocery retailer members have been identified as producers of private-label packaging and other covered materials, and will pay producer fees under the Recycling Reform Act. Our members, therefore, have a direct interest in ensuring program investments address demonstrated needs and deliver measurable improvements at a reasonable cost.

The draft preliminary needs assessment provides a useful starting point, but identifies significant gaps in cost reporting, service availability, usable processing capacity, and actual material destinations. These uncertainties make it difficult to determine where additional investment is necessary and where existing infrastructure could operate more effectively.

A principal concern is that incomplete information could lead to unnecessary expenditures before the system's gaps – and the most cost-effective ways to address them – are adequately understood. The draft's estimated recycling cost of approximately $432 per ton, which the report itself describes as having low confidence in, should not become a default benchmark for program budgeting or reimbursement. Our member companies are seeing extraordinary costs in other states that exceed the legislatively discussed costs because of the failure to appropriately understand current gaps within the broader system.

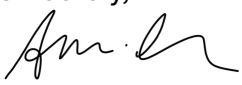
We encourage Ecology to prioritize the following in the full needs assessment:

- Establish consistent, verifiable net costs by service, material, and region, accounting for commodity revenues and preventing duplicate cost recovery.
- Distinguish confirmed service and infrastructure gaps from areas where information is simply unavailable.
- Verify practical processing capacity and actual recovery outcomes before recommending expansion.

- Compare proposed investments with opportunities to improve existing collection, processing, transportation, and markets.

A reliable baseline will help ensure producer fees support necessary, effective improvements while avoiding unnecessary costs for grocery businesses and the customers they serve.

Sincerely,



Amanda Dalton
President $ CEO
Northwest Grocery Retail Association