The Recycling Partnership

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Solid Waste Management Program
Washington State Department of Ecology
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Dear Ecology staff,

Thank you for the opportunity to comment on the Preliminary Needs Assessment for the Washington Recycling Reform Act.

The Recycling Partnership is a purpose-driven organization with the mission of solving recycling's toughest challenges, together. As that statement makes clear, we deeply value collaboration, viewing dialogue as a key element of any effort to effectively evolve our complex, global industry. We appreciate the work being done by Ecology and interest holders across Washington to share viewpoints and effectively move forward the implementation process for the state's paper and packaging EPR law.

As a whole, we feel the Preliminary Needs Assessment provides a comprehensive, well-researched picture of the current state of recycling in Washington and fulfills the requirements laid out in statute. We applaud the work of the group of contributors that completed this important document.

However, we would like to raise several concerns about some of the report's data on generation and collection of recyclable materials.

The Preliminary Needs Assessment reports that the amount of material collected for recycling via service providers and self-haul is 1,150,964 tons. According to U.S. Census data, there are 3,064,820 total households in Washington. Applying the recycling collection information published in the Preliminary Needs Assessment would indicate that 751 pounds per household are recycled per year in the state. This figure exceeds The Recycling Partnership's estimate of total household *generation* (not just recycling) of 623 pounds by 21% and would constitute a highly unprecedented level of household collection performance for the U.S.

For additional comparison, we can look to residential recycling collection data from the City of Seattle. In the City's 2026 Recycling Reform Act submittal to the Washington Department of Ecology, Seattle reports 47,425 tons of curbside recycling collected from 176,656 served households for a rate of 537 pounds per household served. In separate correspondence, City staff notes that the single-family curbside contamination is 10%. Adjusting the 537 pounds by this figure leaves a commodity collection rate of 483 pounds per household. This city's program is considered one of the best in the country, but even its strong collection-per-household number falls 36% below the 751 pounds average calculated from the Preliminary Needs Assessment data.

Similar concerns arise over the data provided in the report for some individual material types. For instance, the Preliminary Needs Assessment estimates that 561,831 tons of residential corrugated cardboard and kraft paper are generated each year in Washington. Dividing this by the 3,064,820 total households in Washington produces a per household generation number of 367 pounds/year, a figure almost three times higher than the estimate that The Recycling Partnership has made of OCC household generation nationally. Further, the cardboard and kraft paper recycled tonnage in the Preliminary Needs Assessment equates to 264 pounds/household/year, a figure twice the national household *generation* rate shown in data for similar materials tabulated by The Recycling Partnership.

The potential overestimation of recycling collection volumes is particularly important because such data will be critical in determining how the system is progressing toward recycling rate goals and other performance standards that will be set in the coming years under the Recycling Reform Act.

The Recycling Partnership has used the data in the Preliminary Needs Assessment to produce the table below, sorted by calculated collection rates. We have highlighted in red a few materials as examples where some specific overestimations may be occurring. We would also point out that the collection rates for some of the key container materials (aluminum cans, glass and PET bottles) are not generally seen at these levels except in deposit states.

Covered Materials	**Calculated Collection Rate (excluding collection in Organics)**
Other Polycoated Packaging	88%

Magazines & Catalogs	84%
Cardboard & Kraft Packaging	72%
Glass Bottles & Containers	63%
Aluminum Cans	60%
#2 HDPE Natural/Clear Bottles, Jugs, & Jars	59%
Aerosol Cans	57%
#1 PET Bottles, Jugs & Jars	54%
#2 HDPE Tinted/Pigmented Bottles, Jugs, & Jars	51%
Gable Top Containers	47%
Other Paper Products	44%
Mixed/Low-grade Paper Packaging	44%
Steel & Tin Cans	43%
#4 LDPE Packaging	42%
#1 PET Other Packaging	40%
Aseptic Containers	34%
#2 HDPE Other Packaging	32%
#3 PVC Packaging	28%
Aluminum Foil/Containers	24%
#3-#7 Other Packaging	22%

Composite Plastic Packaging	21%
#5 PP Packaging	20%
Potentially Compostable Paper Packaging	20%
#6 PS Packaging	20%
PE Film	17%
Composite Paper Packaging	15%
Expanded Polystyrene Packaging	15%
Composite Paper Products	13%
Certified Compostable Bags and Film	13%
Wood Food Service & Packaging	12%
PLA Compostable Packaging	8%
Other Film & Flexible Packaging	7%
Uncoated Short-fiber Paper Products	4%
Wooden Pallets, Crates & Other Packaging	0%
Other Metal Packaging	0%
Composite & Other Glass Packaging	NA
Textile Packaging	NA

The Recycling Partnership would also ask for some clarity around the plastic recycling tonnages listed in Table 28 and how they connect to the recycling tonnages in Tables 13 and 14. For example, the PET recycled tonnage in Table 28 is 21,535 tons, but the PET bottle tons (not counting non-bottle

PET) in Table 13 is 40,005 tons, or almost twice what is shown in Table 28. The same discrepancies seem to hold true for the other resins as well.

On all the points above, we would urge Ecology and its contractors to fully review the data collection and tabulation process being used as the first full Needs Assessment is undertaken next year.

Finally, we would like to ask a point of clarification: when the term “curbside recycling” is used for multifamily households, does that mean actual door-side collection in multifamily properties or does it instead mean that recycling opportunities are provided “on-property,” including the provision of common area collection bins or internal on-property drop-off sites? Bringing more specificity to what exactly is being described in multifamily collection will help interest holders fully understand existing infrastructure in that sector.

Thank you again for providing this opportunity to comment. Please reach out to me directly if you have any questions about the topics discussed here, or if The Recycling Partnership can be of service in any other way.

Dan Leif

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