WFIA Washington Food Industry Association

Supporting and representing the neighborhood grocers, convenience and specialty retail stores, suppliers and distributors that make up the fabric of our communities in Washington State.

October 30, 2026

Department of Ecology
recyclingreform@ecy.wa.gov

RE: Recycling Reform Act - Preliminary Needs Assessment Draft Report

On behalf of the Washington Food Industry Association (WFIA) representing independent grocers, convenience stores, wholesalers and suppliers, thank you for the opportunity to provide feedback on the Recycling Reform Act Preliminary Needs Assessment Draft Report.

We appreciate the Department's efforts to better understand Washington's existing recycling infrastructure, material flows, and opportunities to improve recycling outcomes. While we believe the draft report provides a good foundation for addressing these issues, we encourage greater emphasis on ensuring that the state's recycling system is practical, cost-effective, and operationally feasible.

We believe improving and expanding existing collection and processing infrastructure should be prioritized over introducing additional recycling methods that could create new operational responsibilities and costs for small grocery retailers. Expanding and improving existing curbside recycling programs offers an opportunity to build upon established infrastructure and provide convenient recycling options for consumers without placing additional burdens on retailers.

Independent grocery retailers operate with limited backroom space, staffing resources, and existing waste management infrastructure. Additional requirements for material separation, collection, storage, employee training, recordkeeping, and reporting could create significant financial and operational burdens. The final report should account for these concerns, and any new requirements should complement successful existing programs instead of duplicating them or creating additional costs for retailers or consumers.

We appreciate the Department's consideration of these comments and welcome the opportunity to serve as a resource as Ecology moves forward with the final needs assessment.

Sincerely,

Molly Pfaffenroth
Government Affairs Director
Washington Food Industry Association

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