To: Solid Waste Management Program, Washington State Department of Ecology
Re: Draft Washington Preliminary Needs Assessment, Publication 26-07-077 (October 1, 2026)
Submitted via: Recycling Reform Act – Preliminary Needs Assessment comment portal

Ridwell appreciates the opportunity to comment on the draft preliminary needs assessment under the Recycling Reform Act (the Act). The draft is a strong first baseline of Washington's curbside, drop-off, MRF, and composting system. Our main concern is that it does not yet capture covered hard-to-recycle materials recovered outside the MRF system, through source-separated collection services and conditionally exempt recycling facilities like ours.

Ridwell is a subscription service for hard-to-recycle and reusable materials. We collect what subscribers set out at their doors or send by mail, aggregate it at our own facilities, and send it to specialty processors and end markets. We offer doorstep service in the Western Washington Corridor and in mail-in service statewide.

Our doorstep service accepts plastic film, flexible plastic packaging (including multi-layer), loose plastic caps and lids, and expanded polystyrene (EPS) foam. We also pick up glass in Olympia and parts of Pierce County, which phased out curbside glass, and PET clamshells where local programs don't accept them. Apart from a few jurisdictions that offer special or add-on collection, Ridwell is the only service that picks up these materials at residences. Our mail-in service accepts plastic film, flexible plastic packaging, and loose plastic caps and lids. Both services are open to single-family and multifamily homes; in multifamily buildings, residents subscribe individually.

Most materials Ridwell handles are excluded from local solid waste management plans precisely because they are hard to recycle. Film and flexible plastic packaging wrap around MRF screens, loose caps and lids fall through sorting equipment, and EPS foam is too light and bulky for curbside economics. The draft's own data show the result: in 2024, about 80 percent of residential PE film, 83 percent of EPS packaging, and 92 percent of other film and flexible packaging, roughly 126,000 tons in all, were treated as garbage (Table 13). That leaves significant room to improve recovery.

Recommendations

The Act asks the preliminary needs assessment to describe the services "currently being delivered" (subsection (3)(c), reproduced in Section 13.0). To capture the services that already recover covered hard-to-recycle materials, we recommend the following, numbered to match the detailed comments below:

1. **Track recovery of covered hard-to-recycle materials at recycling facilities, and measure it beyond weight**
    - Add conditionally exempt recycling facilities that process residential covered materials to the Section 7 inventory, with the materials they handle and their throughput.
    - Add a survey and inventory category for facilities that recover source-separated covered materials, so they are not forced into MRF or transfer station categories.
    - Align the plastics categories in Ecology's annual recycling facility report with the statewide collection list's material names This includes adding format-based categories such as plastic film and multi-layer flexible plastic packaging.
    - Count material recovered at these facilities as diversion in Sections 5 and 8, regardless of how it reached the facility.
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    - Report recovery of plastic film, flexible plastic packaging, and EPS by volume and per household served, not only by weight.
2. **Inventory existing collection pathways for covered hard-to-recycle materials and report their costs**
    - Catalog the covered materials excluded from local plans and the services that collect them. These include subscription doorstep and mail-in services and the special pickups and add-on services some jurisdictions offer.
    - Add these services to the Section 6 collection inventory alongside curbside and drop-off programs.
    - Standardize cost reporting by material class. Pair cost per ton with cost per cubic yard or per household served, and report specialty and supplemental services separately from standard curbside service.
3. **Give covered hard-to-recycle materials a route through alternative collection**
    - Document the alternative and supplemental programs that already exist, so the PRO's program plan builds on them rather than duplicating them.
    - Give materials on the Alternative Collection List the same baseline, access, and recovery analysis as curbside materials.
    - Evaluate how convenient alternative pathways are, not just whether one exists.
    - Test the decision to drop small-format plastics against recovery data from programs that already recover them.

Detailed comments

1. Track recovery of covered hard-to-recycle materials at recycling facilities

The data underlying the draft are limited because the facility surveys and Ecology's annual report forms were designed around MRFs and municipal solid waste facilities.

Ridwell operates three Washington facilities that recover source-separated hard-to-recycle materials and are conditionally exempt from solid waste permitting (WAC 173-350-210, Table 210-A(3)). None of the MRF survey's facility types fit our operations, so in June 2026 the consultant team directed us to the transfer station survey. We completed it with notes where its options did not apply. As a result, our facilities are likely categorized as transfer stations. Some Washington-origin material, including Clark County doorstep pickup and mail-in bags routed to the closer facility, is aggregated at our Portland warehouse and would not appear in Washington facility reports at all.

Ecology's reporting categories add a second limitation. The annual recycling facility report organizes plastics by resin (PET, HDPE, LDPE, polypropylene, Styrofoam, "Plastic – Mixed (#1–7)," and "Plastic – Other") rather than by format. Our report on 2024 data, the year the draft analyzes, had no category for plastic film or multi-layer flexible plastic packaging. Ridwell therefore reported about 760 tons of the two together as "Plastic – Mixed (#1–7)." Loose plastic caps were reported with prescription bottles under "Plastic – Polypropylene." To the extent the draft relied on these reports, these materials may have been miscategorized or missed entirely.

The Act directs the PRO to propose the units most appropriate to measure each performance target, as informed by the needs assessment (RCW 70A.208.150(1)). That makes the needs assessment the right place to establish that weight alone understates recovery. This is especially true for plastic film, flexible plastic packaging, and EPS, where effective capture can still produce low tonnage. We suggest that recovery metrics for these materials include volume and diversion per household.

2. Inventory existing pathways to divert covered hard-to-recycle materials and report their costs

Section 8 finds limited end-market acceptance for film, flexible packaging, and expanded polystyrene. It notes these materials often need "separate collection and aggregation pathways." Sections 6 and 7, however, inventory only curbside, drop-off, transfer, MRF, and organics infrastructure. Ridwell currently provides two such pathways, doorstep pickup and mail-in, that move these materials to specialty recyclers. Neither is described, and both should be included.

Ridwell already receives these source-separated materials at residential doorsteps and by mail, then aggregates them for specialty recyclers. EPS foam is a useful example. In a commingled cart it breaks into fragments that contaminate other materials, and loose foam is too bulky to haul economically. Collected separately and kept clean, it can be sent to in-state end markets such as Styro Recycle in Kent, which already qualifies as a responsible end market for EPS under Oregon's Recycling Modernization Act. Retail take-back and other programs serve similar roles.

Producers are already testing source-separated doorstep pickup. Ridwell is participating in a limited pilot in California, funded by Circular Action Alliance, that tests approaches to doorstep pickup of plastic film and flexible packaging to inform California's packaging program planning.

As the authors note, the $432 per ton estimate in Section 4 is an initial attempt to quantify the baseline cost of residential recycling statewide, and it has major structural gaps. Common but hard-to-recycle materials like plastic film, flexible plastics, and EPS cost more per ton to collect and transport than other covered materials because they are light and bulky. A separate, material-specific figure is needed to show the true cost of diverting these materials from landfill.

3. Give covered hard-to-recycle materials a route through alternative collection

The full needs assessment should include recommendations for meeting the criteria for an alternative collection program (subsection (4)(q), reproduced in Section 13.0). The preliminary assessment can lay that groundwork by documenting the alternative and supplemental programs that already exist, including the materials they accept, their service areas, approximate volumes, and the curbside gaps they fill, so the full assessment and the PRO's program plan build on existing services rather than duplicate them. Materials on the Alternative Collection List should be treated as covered materials to be diverted, with the same baseline, access, and recovery analysis used for curbside materials, not as a lower priority.

Which materials need alternative collection depends on local acceptance, and local acceptance is not fixed: what a community's MRFs can accept shifts with sorting technology and end markets. Covered materials that a community's curbside program does not accept should be evaluated for alternative collection in that community, and those placements should be revisited as acceptance changes. The Act's provision for location-specific alternative collection programs offers a way to do this.

Ridwell's glass pickup is a good example. We pick up glass in Olympia and parts of Pierce County, where jurisdictions phased out curbside glass because of contamination, equipment wear, weak markets, and plant closures rather than a lack of resident demand. Glass is a covered material, yet the draft appears to count households in these areas as having curbside recycling available for glass (Section 6). The Act asks Ecology to identify areas where curbside recycling for listed covered materials is only partially available (subsection (3)(c)(iii)). We recommend comparing each jurisdiction's accepted materials against the statewide collection list, drawing on curbside haulers and their affiliated MRFs as the best source of current acceptance information, and reporting areas that exclude glass or other listed materials as partially available.

Access matters as much as availability. The Act requires alternative collection programs to provide tiers of service for collection and convenience, not just a count of drop-off sites (RCW 70A.208.100). A single drop-off site in a county does not offer residents the same access as doorstep or mail-in service, so the full assessment should evaluate the convenience of alternative pathways, not just whether one exists. Ridwell's mail-in program, for example, lets any household send plastic film, flexible plastic packaging, and loose caps and lids regardless of route density. That matters most in the Central and Eastern regions, where the draft finds curbside recycling available to only 65–69 percent of single-family homes and 23–29 percent of multifamily homes.

Small-format plastics show what happens when a material has no pathway. Plastic packaging 2 inches or less on two or more sides, such as small caps, loose tabs, and tiny wrappers, did not receive a recyclable designation, and in August 2026 the Advisory Council dropped small-format plastics from its recommended additions to the Alternative Collection List, though small-format metals remain. With no supported route to recovery, their producers will likely face higher eco-modulated fees. Ridwell will continue to accept loose plastic caps and lids and can report those tons separately. Because the Act directs that the initial lists be evaluated in the needs assessment, the full assessment should test this decision against recovery data from programs that already recover these items.

Responses to Ecology's questions

Do the main findings and conclusions match what you know about recycling and composting in Washington? LLargely, yes. The draft is a strong baseline for curbside, drop-off, MRF, and composting service. It does not capture covered hard-to-recycle materials recovered outside the MRF system, so it understates existing recovery of plastic film, flexible plastic packaging, EPS, and other materials that most local programs exclude (comment 1).

Where does your experience differ from the access described? Several Western Washington communities have curbside service that excludes covered materials such as glass and PET clamshells, which the draft appears to count as fully available. Multifamily residents can subscribe to Ridwell individually regardless of building-level decisions, and our mail-in service reaches households in Central and Eastern Washington, where curbside access is lowest. A single drop-off site per county is available on paper but difficult for many residents to use (comment 3).

Looking ahead to the full needs assessment, what else should we consider? Evaluating covered materials that local programs exclude, including small-format plastics, for alternative collection; measuring recovery of light materials by volume and per household, not only by weight; reporting collection costs by material; and assessing how convenient alternative pathways are, not just whether they exist (comments 1–3).

Do you have information that could confirm or improve the findings? Yes. Ridwell can share aggregate subscriber and tonnage data, subject to Ecology’s confidential business information process. Our annual recycling facility reports to Ecology may also help, though they combine plastic film and multi-layer flexible plastic packaging under “Plastic – Mixed (#1–7)” because no closer category exists (comment 1).

Does the draft accurately describe what facilities can accept and process? Not fully. Ridwell’s three conditionally exempt Washington facilities recover source-separated plastic film, flexible plastic packaging, EPS, loose caps and lids, glass, and PET clamshells. They are not included in the Section 7 inventory, in part because the facility surveys had no category that fit our operations (comment 1).

Does the draft accurately describe where Washington's collected materials go? Only in part. Section 8 relies on limited destination data and does not track covered hard-to-recycle materials that move through specialty pathways. Some Washington-origin material is aggregated at our Portland warehouse and would not appear in Washington facility reports (comment 1). Ridwell can share destinations and amounts sent by material, subject to Ecology's confidential business information process. The main barriers to using more of these materials are their low density and high transport cost, contamination when they are commingled, and the small number of in-state end markets for plastic film, flexible plastic packaging, and EPS.

Closing

Ridwell supports the Act's goals and wants the needs assessments to reflect the full range of services Washington residents already use. We would welcome a follow-up conversation with Ecology or the consultant team before the revised draft.

Sincerely,

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