Roxanne Sharif

Please refer to attachment for comments.

Can Manufacturers Institute

Submitted by: Can Manufacturers Institute

Date: October 29, 2026
Re: October 1, 2026 draft preliminary needs assessment, Publication 26-07-077

Attention: Dan Weston**,** Recycling Reform Act lead

Hello Dan,

Thank you for the opportunity to review and provide input on Ecology's Preliminary Needs Assessment for Washington State's Recycling Reform Act. Building on previously submitted comments, the Can Manufacturers Institute (CMI) is eager to continue serving as a constructive resource throughout this important rulemaking process to help advance recycling and support a more circular economy.

CMI represents U.S. manufacturers of aluminum and steel food, beverage, aerosol, and general line cans, as well as their suppliers. Our members produce the vast majority of metal cans manufactured in the United States and have invested for decades in systems and initiatives that support the collection, recycling, and incorporation of recycled metal back into new packaging[1]. Metal packaging is uniquely circular, with aluminum and steel capable of being recycled repeatedly without loss of performance or material quality[2]. Strong domestic end markets, significant recycled-content demand, and established recycling infrastructure allow used cans to remain valuable commodities that contribute to the economic viability of local recycling systems.

Below are our points on the draft needs assessment with the aim of helping ensure a robust assessment of Washington's current residential materials management system that will help guide the development of the statewide program plan.

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[1] To give one example, with money from CMI members Ardagh Metal Packaging and Crown Holdings, CMI provided grants through The Recycling Partnership for equipment upgrades at eight material recovery facilities (MRF) over the past several years to capture nearly 150M cans resulting in 2.3M in annual income for the U.S. recycling system. CMI continues to invest in MRF upgrades that lead to incremental can capture, shifting towards a revenue share-to-own model further demonstrating the economic value for can recycling. https://www.cancentral.com/aluminum-can-capture-equipment-to-collect-more-than-3-million-used-beverage-cans-per-year-and-pay-for-itself-for-immediate-release/

[2] Aluminum Can KPI Report, Aluminum Association (2024) https://www.aluminum.org/sites/default/files/2024-12/2024_Aluminum-Can-KPI-Report_Final.pdf; Metal Can Fact Sheet (2025) https://www.cancentral.com/wp-content/uploads/2025/05/Metal-Can-Fact-Sheet_FINAL_V2.pdf

- Section 4.1 assigns low confidence to the approximately $432-per-ton estimate because observations are limited and reported costs are inconsistently defined. Table 8 reports that the average is not a complete statewide estimate, so an insufficient basis to effectively target improvements in education, as well as collection services, infrastructure, equipment, and transportation. **CMI recommends that Ecology collect additional data to standardize cost definitions before attributing verified material-specific costs.** Having accurate material-specific costs are key to ensuring fair fees, a core EPR principle for CMI, such that each material pays for its own cost of recycling. It's also in line with 70A.208.160 where the Recycling Reform Act calls for producer fees to "reflect program costs for each covered materials type."

- The needs assessment accurately states in Section 7.3 that metal is a smaller share of material sorted at material recovery facilities, yet it is consistently one of the most valuable commodity in the U.S. recycling system due to ease of recyclability and robust end markets[3]. Aluminum beverage cans in particular are the poster child for a circular economy, on average making their way from bin to new can in less than 60 days[4]. In non-deposit states, aluminum often accounts for more than one-third of MRF revenue[5]. Although packaging-level traceability remains challenging, the metal can industry—particularly can-sheet producers—is working to improve transparency in upstream operations. Section 8.3.4 references several in-state end markets for aluminum and steel, as well as many out-of-state metal end markets. Since 97% of recycled beverage cans turn into new cans,[6] and since most of the aluminum can sheet producers melting down used beverage cans to make can sheet for use in new cans are located mostly in the southeast, it's likely most all of Washington's recycled beverage cans being recycled in the United States go to these southeast can sheet producers. With steel cans, all can bales go to electric arc furnaces since they produce steel products with less stringent residual requirements[7]. Then with pet food cans and aerosol cans, an analysis of aluminum and steel versions of these cans found they have robust end markets, albeit these aluminum cans have different end markets than aluminum beverage cans[8]. RRS

[3] Aluminum Driver of US Recycling System, (2020) https://www.cancentral.com/cans-drive-us-recycling-system/
[4] Aluminum Can-to-Can in the US, (2024) https://www.cancentral.com/wp-content/uploads/Can-to-Can-Claim-Findings_Final-RRS-for-CMI-AA.pdf
Recycling at Scale, https://www.cancentral.com/recycling-scale-aluminum-beverage-cans/
[5] Aluminum Can Drives U.S. Recycling System, GBB (2020), https://www.cancentral.com/wp-content/uploads/2023/01/GBB-Report-Aluminum-Can-Drives-U.S.-Recycling-System-Final-2020-0623.pdf
[6] Aluminum Can KPI Report, Aluminum Association (2024)
https://www.aluminum.org/sites/default/files/2024-12/2024_Aluminum-Can-KPI-Report_Final.pdf
[7] https://www.cancentral.com/wp-content/uploads/2024/04/Recycled-Content-White-Paper-with-Cover.pdf
[8] https://www.cancentral.com/wp-content/uploads/RRS_CMI_Results_Feb2021_FINAL.pdf

conducted this analysis, and Section 8.2.1 mentions that RRS' internal end markets database was a key source for the needs assessment. **CMI recognizes and recommends that Ecology continue to evaluate metal packaging end markets realistically, accounting for established scrap pathways and commingled commodity streams.**

- Section 7.3 also identifies limited data on current processing and storage capacity at material recovery facilities, drop-off sites, and transfer stations—all critical links in Washington's recycling infrastructure. **CMI recommends Ecology evaluate and identify where interventions will strengthen established collection, processing, and end-market pathways with demonstrated recovery outcomes.** Directing limited resources to materials that are supported by existing infrastructure and strong end-market demand will deliver more immediate and measurable benefits than prioritizing "new" materials whose recovery depends on future infrastructure, emerging technologies, or uncertain markets.

- Section 10 recommends gathering additional data on covered materials and collection services. CMI agrees and urges special consideration for aerosol cans. Aerosol cans have the same high-value recycling opportunity as other metal packaging and can be easily sorted using low-cost equipment that exists at most MRFs, including magnets and eddy currents.[9] They do require proper handling and management to help ensure safety at recycling facilities, which many around the country do successfully[10]. CMI and its partners at the Household & Commercial Products Association began an industry-led Aerosol Recycling Initiative (ARI) in 2022 to identify and tackle such challenges, particularly low access and public participation[11]. **CMI recommends that Ecology distinguish these system barriers from packaging performance, recognize aerosol cans as recyclable, and list empty, non-hazardous aerosols as an accepted material for curbside programs.** ARI supported education and outreach to Portland residents with the Oregon producer responsibility organization, Circular Action Alliance, around safe and proper aerosol recycling[12]. The findings demonstrated that aerosol containers can

[9] Aerosol Recycling Initiative White Paper, CMI and HCPA, https://www.thehcpa.org/wp-content/uploads/2024/07/Aerosol-White-Paper-FINAL-1.pdf

[10] Playbook for Aerosol recycling at Material Recovery Facilities (2026) https://www.cancentral.com/cmi-hcpa-publish-aerosol-playbook-for-material-recovery-facilities/

[11] Aerosol Recycling Initiative White Paper Executive Summary, (2023) https://www.cancentral.com/aerosol-recycling-initiative-details-economic-environmental-benefits-recycling-aerosol-can-products/

[12]Read more about the campaign with RecycleOn (https://recycleon.org/oregon/aerosols/) which resulted in the collected aerosol can volume to increase by 50 percent while reducing residue to below s. This result shows that clear listing, education, and outreach can change behavior and materially improve recovery. CMI

be managed successfully within existing recycling systems when paired with clear consumer guidance. The increase in recovered material and reduction in residue content after the education and outreach as compared to before it took place suggest the potential for improved material value, reduced contamination concerns, and greater confidence in accepting aerosols through curbside programs.

CMI appreciates Ecology's consideration of these comments and remains committed to being a constructive partner as implementation of Washington's Recycling Reform Act moves forward.

Thank you,

Roxanne Sharif

Director of Sustainability

Can Manufacturers Institute

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and HCPA welcome the opportunity to provide more detailed information to Ecology about the coordinated campaign in OR. Next month, the Initiative will publish the results online.