BIFMA (Steve Kooy)

Please see the letter attached providing five comments. We look forward to working with the state on EPR program implementation.

BUSINESS + INSTITUTIONAL FURNITURE MANUFACTURERS ASSOCIATION
678 Front Avenue NW | Suite 150 | Grand Rapids, Michigan 49504-5368

BIFMA

October 26, 2026

Dear Washington State Department of Ecology,

The Business and Institutional Furniture Manufacturers Association appreciates the opportunity to comment. BIFMA represents manufacturers of business and institutional furniture and organizations serving the commercial furniture industry. Our members supply workplaces, education, healthcare, hospitality, and public buildings. We support practical packaging reduction, effective recycling, and verified reuse while preserving product protection and workable implementation.

These comments address the October 1, 2026, draft preliminary assessment, Publication 26-07-077.

Comment 1 Preserve the statutory distinction between consumer and commercial packaging
Washington defines packaging by reference to supply to a consumer for personal, non-commercial use. That limitation is particularly important for furniture delivered to workplaces and institutional projects. The assessment should explain how its residential scope relates to material coverage, rather than implying that every package introduced into Washington is covered.

Requested resolution: Add examples for direct commercial furniture deliveries, personal-use home office purchases, dealer and installer unpacking, and mixed distribution channels. Distinguish materials outside the packaging definition from qualifying exemptions. Explain the evidence needed for commercial recovery relief under subsection (19)(p), including allocation when only part of a stream qualifies. Keep out-of-scope and exempt volumes separate from covered-material denominators and cost calculations.

Comment 2 Do not use the cost estimate as a default fee or reimbursement rate
The assessment labels the approximately $432-per-ton estimate as low confidence. Table 8 retains 100 observations with a range of $64-$2,008 per ton and states that the overall average is not a complete statewide annual cost estimate. Reported costs differ in whether they include revenues and particular services. Commercial routes may also include multifamily residences.

Requested resolution: Describe the averaging and weighting methods, sample coverage, excluded observations, and sensitivity of the result. Standardize gross costs, commodity revenues, net costs, overhead, and eligible service boundaries. Separate multifamily residential services from commercial customer activity on shared routes. Do not translate this estimate into producer charges or reimbursement without validated, attributable costs and an explanation of shared-cost allocation.

Comment 3 Evaluate usable capacity by material and service channel
The inventory reports throughput of approximately 675,000 tons and nominal material recovery facility capacity near 900,000 tons. The assessment correctly cautions that design capacity does not establish additional usable capacity. Commercial materials and non-covered materials already consume some of that capacity, while individual packaging formats may require different equipment.

Requested resolution: Measure incremental usable capacity by material, considering shifts, downtime, staffing, storage, bale quality, equipment, and transport. Identify capacity already committed to commercial and out-of-state streams. Compare upgrades with existing segregated recovery and consolidation options. Require cost and outcome evidence before using nominal spare capacity to support collection expansion or capital investments.

Comment 4 Distinguish commercial film and protective foam recovery
Broad PE film and PS/EPS categories can conceal differences between household packaging and clean, segregated warehouse or installation materials. The end-market inventory identifies potential out-of-state plastic processors but does not establish that those facilities receive Washington material or have capacity reserved for it.

Requested resolution: Evaluate polyethylene stretch wrap, EPS cushioning, expanded polyethylene protection, and other protective formats separately where data permit. Document actual collection pathways, contamination limits, densification needs, buyers, and costs. Use commercial recovery evidence to inform consumer recovery opportunities without treating commercial volumes as residential supply or presuming that all protective foams have interchangeable performance.

Comment 7 Recognize repair and reuse of transport assets for durable goods
Pallets, crates, blankets, racks, and protective covers may circulate for many deliveries before retirement. The wood and textile waste tables and end-market descriptions do not provide a complete inventory of those reuse activities. Low recorded recycling tonnage can therefore be an incomplete indicator of system performance.

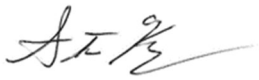
Requested resolution: In the full assessment, inventory existing repair, pooling, return, and redistribution systems and measure active assets, reuse cycles, losses, and final disposition. Explain which consumer-serving activities fall within the program, and which commercial assets are outside scope or exempt. Compare reuse and take-back opportunities with new collection infrastructure, using transparent allocation and reliable records.

Comment 5 Verify markets and protect the packaged product
The preliminary inventory identifies potential outlets and total facility capacities, rather than verified responsible markets or confirmed available capacity. For furniture applications, a material substitution also has to maintain protection of a heavy, finished product. A package that reduces material use but increases product damage may worsen the overall environmental result.

Requested resolution: For the full assessment, verify buyers, chain of custody, usable output, yield loss, residues, and export destinations. Evaluate freight distance, consolidation, and regional demand. Include qualified durable goods buyers in market development. Assess product damage, repair, replacement shipments, worker safety, and relevant transport testing before recommending reduction or substitution of protective packaging.

Given durable goods are constantly balancing shipping density (typically by reducing packaging) versus protection to avoid damage (a high cost high environmental impact), we request clear coverage and reporting guidance, recognition of successful packaging and recovery programs in place, and transparent costs supported by verified environmental outcomes. Implementation should reflect the distinct needs of protective furniture packaging and the roles of manufacturers, dealers, and installation partners.

On behalf of BIFMA and its members,



Steve Kooy
Technical Director, Health & Sustainability
Business + Institutional Furniture Manufacturers Association (BIFMA)