



Recycling Reform Act

Ecology Updates

Statewide Lists Subcommittee, April 14

Progress Update

- RFI issued April 1, due May 8
- Upcoming surveys (more info soon)
- Candidate material list
- Evaluation criteria

Request for Information to Develop Statewide Recycling Lists and Needs Assessments

April 1, 2026

Why is Ecology requesting information?

The Washington Department of Ecology (Ecology) is requesting technical information to inform requirements of [Section 090](#) and [Section 110](#) of the Recycling Reform Act passed by the legislature in 2025, which requires an extended producer responsibility (EPR) program for consumer packaging and paper products (“covered materials”). The law, codified in Chapter 70A.208 RCW, directs Ecology to:

- Develop four statewide collection lists, due by October 1, 2026, identifying covered materials suitable for residential recycling, residential composting, public place collection, or alternative collection.
- Complete a preliminary needs assessment due by December 31, 2026, describing current recycling system access, infrastructure, contracts, costs, material flows, and market conditions.
- Complete a full needs assessment, due by December 31, 2027, evaluating system performance, environmental and public health considerations, investment needs, and opportunities for improvement.

This Request for Information (RFI) is intended to:

- Identify relevant datasets, studies, and technical insights.
- Support evaluation of specific covered materials for statewide collection lists.
- Identifying and filling gaps in available information to support the needs assessments.
- Gather recommendations on methodologies, performance metrics, and system improvement opportunities and priorities.

The information collected as part of this RFI is in addition to (i) data submitted by service providers through Ecology’s service provider registration, as described below, and (ii) data and input collected through surveys to key audiences. RCW 70A.208.110(7)(a) states that a service provider or other person with data or information necessary to complete a needs assessment must provide the data or information to the department upon request.

Ecology has already requested that service providers (including local governments, collectors, material recovery facilities, and processors) register with Ecology and share information pursuant to RCW 70A.208.070. Ecology may reach out to service providers who have not submitted the requested information or submitted incomplete information.

Next Steps

April – May

- Incorporate subcommittee feedback
- Full advisory council review
- Finalize candidate material list
- Continue RFI/survey data collection

June - List subcommittee meeting

- Share examples of how materials received are being incorporated

July - List subcommittee meeting

- Review/feedback on material evaluations

August - List subcommittee meeting

- Review/feedback on four draft lists

Candidate Material List

Materials to be evaluated as candidates for inclusion on statewide lists

- Began with waste characterization materials
- Removed non-packaging and paper products
- Removed fully exempt packaging and paper products
- Grouped materials

Initial Candidate Materials List				v. 2026-03-30
#	Class	Material Name	Description	
1	Paper Packaging	Cardboard	Includes cardboard boxes	
2		Uncoated Food Service Cardboard	Includes food service corrugated cardboard Examples: pizza box	
3		Waxed or Laminated Corrugated Cardboard	Includes waxed cardboard Examples: secondary packaging produce box	
4		Kraft Paper	Includes kraft paper, kraft paper bags, kraft shipping envelopes Examples: kraft paper void fill, kraft paper grocery bags	
5		Paperboard	Includes single or double sided clay-coated paperboard, uncoated	

Candidate Material List

Feedback sought on:

- **Coverage:** Are there any materials identified as exempt or non-covered that should instead be considered covered?
- **Aggregation and disaggregation:** Are the initial candidate materials appropriately grouped or split into material categories for evaluation?
- **Including exempt and noncovered materials:** Should the statewide lists include noncovered and exempt materials?

To include or not to include...

Working interpretation: Implied “covered”

RCW 70A.208.090(1)(a) The department must develop lists of covered materials determined to be recyclable or compostable statewide. (...) the department must distinguish between:

- (i) Materials determined to be suitable for residential recycling collection, whether in a commingled or in a separate container;*
- (ii) Materials determined to be suitable for residential composting collection;*
- (iii) Materials suitable for public place collection; and*
- (iv) Materials suitable for alternative collection.*

Implications of working interpretation

Ecology's lists would not include exempt or noncovered materials

- Ex. Recycling collection list would not include newspaper or small scrap metal
- Ex. Composting collection list would not include yard debris

RCW 70A.208.090(4)(a) (...) a material that is not identified as suitable for residential collection may not be collected as part of a residential recycling program.

Implications of interpretation

Ecology's lists would not include exempt or noncovered materials

- Ex. Recycling collection list would not include newspaper or small scrap metal
- Ex. Composting collection list would not include yard debris

RCW 70A.208.090(4)(a) (...) a [covered] material that is not identified as suitable for residential collection may not be collected as part of a residential recycling program.

- If “covered” is implied, this restriction applies only to covered materials. Programs could add noncovered and exempt materials. Costs for those materials not covered.

To include or not to include...

Interpretation #2: Allow for all materials

RCW 70A.208.090(1)(a) The department must develop lists of covered materials determined to be recyclable or compostable statewide. (...) the department must distinguish between:

- (i) Materials determined to be suitable for residential recycling collection, whether in a commingled or in a separate container;
- (ii) Materials determined to be suitable for residential composting collection;
- (iii) Materials suitable for public place collection; and
- (iv) Materials suitable for alternative collection.

Implications of interpretation #2

Service Provider Responsibilities

RCW 70A.208.080 A service provider receiving reimbursement or funding under an approved plan must:

- (1) Provide covered services for covered materials included on the statewide collection lists...*

Producer Responsibility Organization - Plan

RCW 70A.208.130(3) A draft plan must include at a minimum:

- (l) Performance standards for service providers as applicable to the service provided including, but not limited to:*

- (i) Requirements that service providers must accept all covered materials on the applicable list established by the department under RCW 70A.208.090(1)(a);*

Service Provider Reimbursement

RCW 70A.208.170(2)(a) A plan must provide a methodology for reimbursement rates for covered services for covered materials, exclusive of exempt materials.

Implications of interpretation #2

- Ecology's lists would potentially include exempt or noncovered materials
- Service providers would not be required to collect noncovered materials
- The PRO would not be obligated to pay for noncovered materials
- Programs would have a choice – to collect or not to collect
- Same potential for disharmony

Evaluation Criteria

RCW 70A.208.090(1)(b) provides a list of criteria may consider in determining suitability for collection

Evaluation Criteria Categories

1. Existing infrastructure and service
2. Market factors
3. Design, behavior, and contamination
4. Environmental and public health

Evaluation Scale

- Strong
- Moderate
- Concerning
- Challenging

Evaluation criteria

Feedback sought on:

- Are there any criteria from the legislation not sufficiently represented?
- Are there any criteria not included you would like us to consider?
- Approach to scoring - conservative or expansive?