

Recycling Reform Advisory Council

Statewide Lists Subcommittee

Meeting Notes

April 14, 2026, 11-12:30pm PT

[Meeting Slide Deck Link](#)

- I. Welcome
 - a. Attendance & Introductions

Name	Organization	Attendance
McKenna Morigan (Chair)	Seattle Public Utilities	Y
Alissa Campbell	Recology	Y
Becci Piepel	Douglas County Solid Waste	Y
Danielle Waterfield	AMERIPEN	Y
Jay Blazey	Cedar Grove	Y
Julie Gilbertson	CAA	Y
Karen Hultgren	Pierce County	Y
Megan Daum	American Beverage Association	Y
Michael Liptack	Friday Harbor	Y
Moji Igun	Zero Waste Washington	Y
Rick Vahl	Waste Connections	Y
Grant Williams	Tribal Solid Waste Advisory Network	Y
Jeff Zillich	WM	Y

- b. Review of meeting agenda
 - i. Meeting goals:
 1. Gather consolidated feedback from the subcommittee on consultant team's questions and on any other questions or big themes that come up in the discussion
 2. Subcommittee assistance in preparing guidance or instruction in preparation for this step of statewide lists for full Advisory Council meeting on 4/29
 - c. Call for disclosure of conflicts of interest related to today's meeting agenda
 - i. No conflicts of interests disclosed

- II. Ecology Progress Updates — [Dan Weston, Ecology](#)
 - a. RFI & Key Informant Surveys
 - b. Go here to find the link to the RFI: <https://ecology.wa.gov/waste-toxics/reducing-recycling-waste/our-recycling-programs/recycling-reform-act>
 1. Responses to RFI are due May 8
 2. RFI not specific to the list and also includes information related to needs assessment
 - ii. Ecology is also developing a series of surveys that will be sent out to municipalities, tribes, collection service providers, and processing facilities. If you are one of these and also planned on responding to the RFI, consider completing the survey first so that you don't end up

having to submit the same information twice. Dates for release of the surveys are still TBD.

1. If you are not mentioned in (II)(a)(i)(3), you should use the RFI to submit information and materials to inform statewide list process.
- iii. Upcoming subcommittee meeting in June will likely be sharing examples of how the materials from surveys and RFI are being received and incorporated into the evaluation process for statewide lists
- c. Statewide Lists Development – Candidate Materials & Evaluation Criteria
 - i. Ecology’s working interpretation is that the lists are meant to address “covered materials” only and that restriction on inclusion in residential recycling programs is for “covered materials” only as well.
 1. Under this interpretation, Ecology may still include non-covered materials as “recommended” but not part of official “required” lists.
 2. Alternative interpretation is possible, but Ecology’s assessment is that it leads to the same outcomes. Open to hearing legal arguments to support alternative interpretation.
 3. Next steps will include evaluating all the materials on the candidate list by the evaluation criteria listed

III. Subcommittee Discussion ([Reviewable documents here](#))

a. [Candidate materials lists](#)

i. Discussion:

1. Coverage: Are there any materials identified as exempt of non-covered that should be considered covered?

a. Milk is exempt from the beverage definition, but not from packaging or paper, so is a covered material

i. Will milk containers be included in a non-beverage category, a beverage category, or own category?

1. Further consideration on how to address that in the statewide list and in the tonnage analysis

b. Question about types of films that are actually allowed and some examples given (i.e., PE and PA film types) and whether possible to clean up examples of plastic film within the list

c. Shredded paper is included in the list and curiosity on whether it is considered a covered material

i. It is in Oregon, but don’t recall a law exempting it in the same way that Washington does

ii. Minnesota accounts for shredded paper as a potential for drop off

iii. Shredded paper seems to fit better under small format paper and would like clarification

- d. Segregating glass by color, noting that there are certain markets that prefer it, so Minnesota did this
 - i. Further clarification about the non-need to separate out glass colors in terms of collection in covered material list; not necessary
- e. Polypropylene: Is there a need to separate out bottles and other containers considering that they get bailed together?
- f. Consider category of small format plastics (e.g., candy wrappers, other flexibles)
 - i. There is small format rigid plastics, but maybe not under film
- g. Seems like a question about funding and whether this is attempting to redefine items that are exempt and change them to covered so that the item does not get reimbursed to the service providers
 - i. Believe it is the consulting team as whether there is anything on the non-covered list that is mischaracterized
 - ii. If there is something that is actually not an exempt material, it should be on the candidate list – independent of whether it's funded or not
- h. Clarification on covered versus non-covered; current thinking is that covered means it's in the law and that the producer of that material will have a financial obligation to help fund it (e.g., shredded paper is bought, but it is a product of the end user and would fall under regular paper somehow to be covered for the financial piece)
 - i. Current Ecology interpretation (III)(a)(3)(a) is that shredded paper, newspaper are non-covered or exempt materials and the list is consistent in categorizing that material
 - ii. Thorny issue because mailings are paper products and they do get shredded so producers of those materials will be paying into the system, but the statewide list is not the same as the covered materials list, but trying to reconcile them here for the purposes of evaluating what should be on the statewide list if it is constricted to covered materials
 - 1. Agreement with this interpretation of shredded paper not being covered and it would prevent double reporting
 - 2. Important to not conflate the two things; producers of printed paper that gets

shredded are paying in, but this is different from covered list

2. Aggregation and disaggregation: Are the initial candidate materials appropriately grouped or split into material categories for evaluation?

- a. There is an opportunity in reviewing to consolidate a lot of the product categories utilizing other states' implementation interpretation (e.g., plastics, aseptic can have a broader, bigger category to consolidate)
 - i. Current list is lengthy and high concern about education across the state and encourage folks to continue recycling and getting as much recycled as possible
 - ii. The current list for review is highly disaggregated because consultants are focusing on where their markets are at and whether there are difference in these materials that might make a difference in the sortation or at the end market
 1. Clarification that this list will not go before the public when it's final and to educate them, but rather delivered as a technical list to Ecology who will combine it into something that is more consumer-friendly
 - iii. Aseptics being broken out from others and cartons is a great example that could be rolled into a single category depending on how they score across the evaluation criteria; aggregation will happen at the end and disaggregation now for the sake of evaluation
 - iv. There will be more time to discuss where they land on the list and consolidation
- b. Term "candidate list" is a little misleading because this is really the categories that are being evaluated and there are things on the list that are not candidates under any circumstances
 - i. Appreciate explanation that this list is not concrete yet
 - ii. Current philosophy of how to build the actual final list is taking all materials and considering all possible materials across all criteria, but current spreadsheet doesn't speak to likelihood of it making the final list
- c. PET Clear, if following design guidelines, may include slightly colored/tinted
- d. Should black plastics be disaggregated further?
 - i. Similar suggestion on encouraging disaggregation by resin for purposes of evaluation

- e. Good idea to compare against the Colorado list and comparing would help
- f. Would like more clarity about small format and differentiation between food service and non-food service molded pulp
- g. Consultants aware of challenges associated with aerosols, this kind of issue will get considered via a couple of the criteria for evaluating candidate materials: ease of preparation, and compatibility with existing systems

3. Including exempt and noncovered materials: Should the statewide lists include noncovered and exempt materials?

- a. Let Ecology know if you have a legal argument for different interpretation of law
- b. Under Ecology's interpretation that lists are meant to include only "covered materials", some materials that are commonly included in residential recycling programs today would be excluded from the "required" list (e.g. newspaper, blank copy paper).
- c. Expectation is that Ecology would produce lists of covered materials required for collection and would additionally include non-covered and exempt materials recommended for collection (as guidance)
 - i. It would be helpful to make sure there is clarity about having the statewide covered list be the official list and having the recommended for collection so it's clear that items like newspaper or food waste are going to be collected but just not under this within the bounds of this law
 - ii. If Ecology intends to include non-covered materials as "recommended" materials, they should also be evaluated against criteria in some way as well (for fairness/justification).
- d. [Evaluation criteria](#)

ii. Discussion:

1. Are there any criteria from the legislation that are not sufficiently represented?

- a. Clarification that there may be cases where a material could theoretically rate strongly across most criteria, but if it was prohibitive in collection, it might not make the list
- b. We need to ensure that any materials included on the list are practical to manage across all regions of the state, including rural counties where transportation, infrastructure and market access are significantly different

- i. What criteria are we using to determine that a material is viable statewide not just in high density areas?
 - ii. Access criteria addresses this as well as compatibility with existing infrastructure
 - iii. Section 3.2.1 supports this comment
 - 1. One of the criteria rating factors for 3.2.1 (statewide collection access) is: There are examples of residential collection in the four regions in the state, including Northwest, Southwest, Central, and Eastern WA
 - iv. If a material was only currently collected in certain areas, it would score lower on the scale
 - c. As noted above, if Ecology is going to recommend things that are outside of the covered materials list for collection, there should be at least some kind of abridged criteria that those materials are evaluated against so there is justification and clarity for why those non-covered materials are being recommended.
- 2. *Are there any criteria not included that you would like Ecology to consider?***
- a. Caution against brand new criteria, but does allow for harmonizing with other states
 - b. CAA supports the additional criteria for harmonization across EPR states
- 3. *Should Ecology take a more conservative or expansive approach to scoring?***
- a. 80% threshold is because you could have a 60% threshold where 35 counties are not represented and that should not rank strongly
 - i. 60% is commonly used in the industry, but in this context, 80% makes sense
 - b. We wrote the criteria rating factors as the gold standard / best case (meaning it deserves a strong rating). Materials that don't quite get there would get a lower rating (moderate or concerning)
 - c. If we are looking to increase public trust in recycling then we should take a conservative approach to scoring items suitable for statewide collection
 - d. One of the promises of the EPR program is that it provides us opportunity to expand services so think there are likely materials that are only collected in that 60% population center where there may be real benefit or merit to expanding beyond that
 - i. Want to be sure we're not biasing toward status quo where we couldn't leverage the economies of

Public Comment (for FYI only, will not be posted)

Peter Bierbaum, OWR (Guest) 12:10 PM Unclear why small format paper packaging category (line 16) is listed as < 3 inches in two directions and other material categories are listed as < 2 inches in two directions. Other states including Oregon and California use < 2 inches in two directions for small format paper.

Heather Trim (Guest) 12:31 PM I would like for you to add public comment to this meeting agenda for the future, please