

May 8, 2026

Washington State Department of Ecology
Waste 2 Resources Program
P.O. Box 47600
Olympia, Washington 98504-7600

Submitted via email: recyclingreform@ecy.wa.gov

RE: Request for Information to Develop Statewide Recycling Lists and Needs Assessment

To Whom It May Concern,

The Flexible Packaging Association is pleased to provide some resources on flexible packaging manufacturer and recycling to assist the Department in drafting proposed statewide recycling collection lists.

The Flexible Packaging Association (FPA) is the voice of the U.S. manufacturers of flexible packaging and their suppliers. The association's mission is connecting, advancing, and leading the flexible packaging industry. Flexible packaging is produced from paper, plastic, film, aluminum foil, or any combination of those materials, and includes bags, pouches, labels, liners, wraps, rollstock, and other flexible products. Flexible packaging is the fastest-growing and second largest segment of the U.S. packaging industry, representing \$51.5 billion in annual sales and approximately 98,000 workers in the U.S. Our industry has more than 2,000 employees at flexible packaging manufacturing facilities in Washington State, representing a total economic impact of nearly more than \$2.7 billion.

Before we provide resources, we wanted to comment on how we believe the state should consider flexible packaging as it relates to recycling. To begin, we believe it is important to note that flexible films could be made from plastics, paper, metals or a mix of materials. These

differences in materials result in different recyclability and recycling /collections systems. As the Department looks to regulate flexible packaging, we encourage you to keep this in mind.

Alternative Collection System Considerations

The flexible packaging industry recognizes that the highest volume—and highest quality—post-consumer plastic flexible films and packaging are collected through depot or retail drop-off systems. Very few communities offer curbside access for recycling flexible films and packaging, and those that do often encounter challenges in generating bales of sufficient economic value.

For more than 30 years, the flexible packaging industry has worked collaboratively with retailers to collect flexible films and packaging through alternative collection programs.¹ These systems represent one of the most established alternative collection infrastructures in the country. In 2024, store takeback programs throughout the U.S. collected 114,000 tons of residential film—**11 times more** than the 10,000 tons collected through municipal systems.² Store drop-off also delivers cleaner material and at lower costs: \$250–550 per ton versus about \$3,000 per ton for curbside programs.³ Retail drop-off is so well established in the U.S. that the national How2Recycle⁴ program has a dedicated “Store Drop-Off” label, and PlasticFilmRecycling.org⁵ drew over 200,000 unique visitors within its first year. Several meal-kit companies direct their customers to return films and empty gel packs to retail drop-off locations.⁶ Many municipalities support store drop-off as a cost-effective complement to curbside collection.

¹ Initially via American Chemistry Council’s Wrap Recycling Action Program (WRAP) and now the Flexible Film Recycling Alliance (FFRA) managed by PLASTICS.

² Eunomia for APR (2024) “[How to Scale the Recycling of Flexible Film Packaging: Modelling Pyrolysis’ Role in Collection, Quantity and Costs of a Comprehensive Solution](#)”

³ Navigate (2025) “Unlocking Curbside Recycling for Flexible Films: What Must Be True” Presentation to SPC Impact (Seattle, WA)

⁴ <https://how2recycle.info/about-the-how2recycle-label/store-drop-off-us-only/>

⁵ <https://plasticfilmrecycling.org/>

⁶ <https://www.hellofresh.com/about/sustainability/packaging>

As the Department seeks to develop a statewide recycling collection list, we encourage you to consider the role of store drop-off or depots as a valuable subcategory, like how the State of Oregon has identified materials intended for curbside versus those best for depot collection. A 2022 study in Seattle reinforced the value of these programs to ensure cost effective plastic film recycling.⁷

FPA believes alternative collection systems (ACS) are an essential tool for establishing recycling pathways for materials not readily compatible with curbside systems such as flexible plastic packaging. Community curbside programs are often hesitant to add new materials until stable end markets exist. ACS programs help build those markets by providing source-separated material with minimal sortation requirements, thereby demonstrating end-market viability.

Harmonization Where Possible

As an increasing number of states seek to develop statewide recycling collection lists to support extended producer responsibility programs (EPR), we encourage the Department to evaluate opportunities for alignment with established peer states. Greater harmonization will reduce administrative burdens on both producers and producer responsibility organization (PROs), minimize duplicative compliance structures for multi-state producers, and promote consistency in recycling market standards across jurisdictions.

Resources

To help the State understand *Section A: "Current or recently introduce covered materials and material types by volume and weight,"* we are including in the FPA's own internal report: "*Flexible Packaging U.S. Market Profile & Segmentation Report: 2021*" This report summarizes the volume

⁷ Encorp Pacific/Return-It™ (for American Chemistry Council (2022) 2022 Greater Seattle Plastic Film Recycling Circularity Pilot Report.

of different types of flexible films on the market. While the attached is from 2021, we are in the process of updating that report and expect to have insights from 2025 this year we would be happy to share that when available. Additionally, we are attaching our 2024 *State of the Industry Report* – our member-only survey reflecting the flexible packaging industry size, scope and trends.

To help answer *Section A: “Evaluation of current service levels (including availability, whether via curbside or drop off materials collected, frequency, types of services, types of containers used) and costs”*, we offer the following details on store drop-off as identified by the plasticfilmrecycling.org website, the most comprehensive directory of depot and alternative collection programs in the U.S. FPA is a proud contributing member to the directory and its umbrella organization, the Flexible Film Recycling Alliance (FFRA). According to internal directory information, plasticfilmrecycling.org has recorded a total of 611 retail depot locations within Washington State.⁸ A total of nine (9) retailers operate those locations and they reach 31 of the 39 counties in the state. Counties where locations have not yet been identified include: Columbia, Ferry, Garfield, Klickitat, Pacific, San Juan, Skamania, Wahkiakum.

It should further be noted that the FFRA, the organization managing the plasticfilmrecycling.org directory, is currently working on a third-party audit program which will help ensure locations are accurate on the website and help quantify the volumes of material collected through these depots and sent for recycling. Once implemented, by focusing on collection systems, this program will be a complementary step before responsible end market audits, further solidifying the verification needs to confirm this collection model. Additional information for locations and the audit program can be provided. Please feel free to contact us with any requests.

⁸ The Directory aggregates locations from retail submissions and targeted web-scraping sources. This aggregation provides a signal of retail drop-off but is not a robust or exhaustive measurement of all opportunities.

As it relates to *Section B3: Public Awareness, Education and Behavior Change*, we note that FPA, in collaboration with the FFRA and ERM Shelton Group, recently completed an ethnographic study and consumer survey to better understand how we can increase consumer participation in flexible film and packaging recycling. The findings indicated there is a significant opportunity to advance consumer participation in depot collection if we can help them better identify the materials they can collect and create a consistent/harmonized experience. We anticipate the launch of a pilot campaign in Minnesota towards the end of 2026 to help us quantify the impact of a targeted consumer campaign. We are happy to share more information on the campaign and insights should that be of interest.

Lastly, per *Section B5: Access, Convenience and Barriers to Participation*, we have attached an infographic based on a forthcoming study exploring the role of flexible plastic films in California's Women, Infants and Children's (WIC) food subsidy program. This study evaluated the frequency of flexible packaging formats found in various food deserts across the state and the potential alternatives that exist, to help evaluate the impact a ban or restriction on flexible plastic packaging materials. While Washington State may have different impacts, we believe the trends may be indicative of areas to be cautious with, including restrictions on materials allowed per the program guidelines, including disincentivizing certain formats from reusables to multi-material pouches. An analysis of impact on food subsidy programs was missing in the recent California needs assessment for their packaging EPR program, so we encourage Washington State to ensure it is evaluated in its study.

We appreciate the challenging task before the Department as you seek to define a statewide recycling collection list and identify the resources needed to ensure the state EPR program effectively realizes its objectives. We hope these resources are of value and we are happy to meet with your team to elaborate on any additional questions or resources you may have.

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Respectfully,



Kyla Fisher
Director of Regulatory Affairs and Sustainability
Flexible Packaging Association (FPA)