



DEPARTMENT OF
ECOLOGY
State of Washington

Detailed Comment Summary

On the Washington State
Solid & Hazardous Waste Plan Update

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Detailed Comment Summary

On the Washington State Solid & Hazardous Waste Plan Update

by;

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Introduction

These comments have been summarized and categorized from those received in the initial input gathering phase held from September 2013 – January 2014.

Ecology staff gathered comments via meetings with groups or individuals, emails, phone calls and an online survey. We received more than 100 pages of comments from stakeholders. Comments were provided by:

- 36 local government solid waste advisory committees (SWACs) or staff
- 4 state agencies
- 2 collection companies
- 1 federal government group (EPA)
- 1 other government staff (Sound transit)
- 3 non-governmental organizations
- 2 industry associations
- 10 business groups or staff
- 4 citizens surveys
- 20 anonymous surveys
- Ecology Staff

A concise two-page summary of comments is available <https://fortress.wa.gov/ecy/publications/SummaryPages/1407013.html>. This 20-page summary is intended to provide more detail. The comments are categorized, though there is some overlap. Comments were not counted as in a popular vote, but reflect what we heard, whether frequently or infrequently. However, the main comment themes are included.

We will use these comments to help draft new plan actions and content. A draft document will be made available for additional stakeholder input later in 2014.

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Summary of Finance Comments

New Funding Mechanisms

- Relying on tip fees to fund the whole system is not working and cannot work. Fix the conundrum between reducing waste and the need to generate revenue via tip fees. This needs to be a priority in the plan. Share the work that has been done; keep working on it.

Better and More Funding

- The system also needs more funding overall. Raiding existing funding sources adds to the problem.
- Examine how we fund core activities. Recognize reduction of pesticides, Integrated Pest Management, and other programs like this as important and their rightful place in Model Toxics Control Act (MTCA) funding.
- More and better funding needed for recycling, MRW, organics, C&D, litter pick-up, Health districts, infrastructure and markets. Funding for entire system top priority; MRW a close second.
- We need the ability to help fund the infrastructure we need.

WUTC Rate System

- Look at WUTC Rate System. How to improve the cost-assessment system? Is it a barrier to waste reduction? Can we change it to create incentives for waste reduction and recycling?
- Look at opportunities through the UTC system such as revenue-sharing agreements.

Proposed Ideas for New Finance Mechanisms

- Many ideas proposed for new finance mechanisms, some contradicting each other.
 - Look for systems that incentivize recycling.
 - Do not rely on punitive measures.
 - Taxes on products; also tax incentives.
 - Tipping fee surcharge; solid waste tax; recycling tax.
 - Develop finance model for good plan / program minimum requirements.
 - Mandatory recycling charges.

Study and Analysis on Finance

- Look for innovative ideas; study some of the ideas proposed.
- Analyze our current system; finance for better data and understanding.

Manufacturer Responsibility and Cost Internalization

- Manufacturer responsibility and cost internalization is needed to help with MRW funding, for packaging, for better design, needed infrastructure, and to create a reliable, safe, non-divertible funding source.

Waste Diversion and Economic Development

- Emphasize connections between waste diversion and economic development.
- Look for new economic opportunities such as job creation. Look at programs that will create markets.

Rural and Urban Funding Needs

- Local government needs funding help.
- The ability to fund programs is different for urban and rural areas. Fewer materials and farther distances to travel create real cost challenges for rural governments. Need funding to help rural areas with these costs.

No Unfunded Mandates

- Plan should not set goals that aren't financially responsible.
- More regulations add to cost for locals – not sustainable.

Consider True Costs

- True costs meant different things to different people.
 - No unfunded mandates.
 - Lifecycle cost should be analyzed.
 - Use cost benefit analysis more when selecting new activities / programs.
 - Transparency in pricing structure.
 - Programs need to make economic sense and be cost-effective.

Summary of Comments on Grants

Secure Funding and Plan Focus

- Grants are important and at risk of being lost. Need secure source for grants – they are vital.
- Include all grants in plan – Coordinated Prevention Grants, Public Participation Grants and Community Litter Cleanup Program.

Grant Administration

- Simplify reporting requirements.
- Reduced or zero match for grants to disadvantaged counties. Hard for small governments to compete in offset cycle.

Grant Uses

- Want more flexibility and local control over priorities for grant use.
- Grants desired for infrastructure, including MRF improvements, for companies to produce recycled-content products; and for tribes in planning areas.
- Continue to help grant programs (including CPG) align with the Waste 2 Resources / state goals.

Grants for Education

- Use CPG to support statewide consistent educational work. Fund from bigger counties or rural counties with an Inter-Local Agreement or have ECY fund activity.
- ECY fund all CPG-funded educators on new info for example, commingled work. Produce one set of brochures locals can personalize. Focus CPG funds on chosen topic.
- Use PPG to fund creation and use of an educational curriculum.

Summary of Data & Measurement Comments

Analysis and Decision Making

- Review what's been accomplished since last plan update (share status reports) and move on from there.
- Important to track plan progress and show meaningful results. If it's worth doing, it's worth measuring.
 - Prioritize work based on scientific data, not on whimsical "what's next." Use research and science, such as social marketing and lifecycle analysis, to make decisions about program focus.
 - Provide more analysis and interpretation of existing and emerging trends will help us be more forward-looking and help prove worth of programs.
 - Examples of analysis / interpretation needed: residents served through the WUTC system, differences in rates and comparative diversion rates, fate of recycled or disposed materials.

Targets / Goal Setting / Standards

- Setting realistic and clear targets is important, but make sure there is infrastructure and markets to meet the targets. Need program support and enforcement mechanism with teeth to reach targets.
- Suggested goals / targets: improved waste reduction; carbon-reduction targets for specific materials tied to waste reduction; curb consumption; zero waste; sustainable materials management.
- Allow flexibility for locals in reaching goals.
- Balance tonnage with environmental protection (one ton of concrete does not equal one ton of mercury).
- Need to look at WUTC performance measurement system.

Communicating Results with Stakeholders

- Communicate results of data gathering – even if they are difficult to hear.
- Suggested areas to expand communication and distribute more information:
 - Solid waste annual report.
 - Make Progress Report searchable, provide online forums.
 - Impacts of our programs.
 - County-level data.
 - Break down statewide data to where staff can see themselves making a difference.
 - Data, charts, graphs, stories, maps and other visuals, and presentations that make the plan easy-to-understand and accessible.
- Educate the public on the impacts and costs of recycling – they want numbers and justification. Education key to increasing recycling rates.
- Need to communicate data effectively. Clarify methodologies and data – what/how used. Be transparent.

What to Measure:

- Focus on different ways of measuring success, such as waste prevention and environmental impacts. Identify causes. Gear objectives and measurements to curb consumption and promote sustainable materials management.

- Suggestions of what to measure:
 - Waste management.
 - Per capita generation and disposal rates.
 - Prevention, reuse.
 - Reduction.
 - Participation.
 - Waste characterization/audits.
 - Landfill life expectancy.
 - Chemicals.
 - Toxicity and what can't be recycled because of toxicity issues.
 - RTT priority products.
 - Items for product stewardship.
 - Material that went into making products.
 - Climate, carbon footprint.
 - Return on investment.
 - Weight versus volume issues.
 - Industry shifts.
 - Markets.
 - Materials flow.
 - C&D recycling.
 - Fate of discarded waste materials.
 - Recycling system loss.
 - Cost of services.
 - Investments in outreach/education
 - County/rural/urban recycling rates.
 - Chemicals or products where "waste" is pathway to human or environmental exposure.
 - Leachate.
- Exempt fewer things from measures.
- State needs a common measurement method, such as per capita or per household disposal. Need clarity with goal measurement that is comparable statewide. Need a way to evaluate success and common measurements of program success.

Recycling Versus Diversion Definitions

- Simplify the definition of recycling versus diversion. Look at the big picture of solid waste.
- Consistent definitions are important. People are confused whether they are a recycler or material-recovery facility.
- Clarify definitions of recycling (is Alternative Daily Cover or Waste To Energy recycling?). Look at changing markets.
- Recognize emerging materials as "recycling" when appropriate.

System Loss/Contamination

- Need to look at whether materials are actually recycled and rethink the way we calculate the percent of recycling. This would change what counties do. Collection does not equal recycling. Where does recycling go?
 - Control contamination of materials coming from other counties for economic reasons.
 - Some suggested strategies: state needs to have MRF standards in place and audits (bale break reporting). WUTC, Ecology and city contractors need to have something in place to address this.

Facility Reporting and Data Collection

- Better, simplified, more accurate and meaningful reporting, consistent from facility to facility to ensure level playing field. Check/audit report data. More accurate numbers.
- Be more efficient in processing reports; standardize reporting and make electronic/paperless. Provide feedback to stakeholders on reports.
- Hazardous waste data is two years behind; Resource Conservation & Recovery Act (RCRA) information is not accurate; recurrent and non-recurrent waste seem inconsistent; problems with Turbo plan; incomplete data because of reporting requirements.

Local Government Issues and Data

- Consistent reporting from county to county; per capita might help. Real reporting of recycling would change what counties do. Recycling rates between counties is very competitive.
- Data or information that would be helpful to counties:
 - Statewide waste-characterization study.
 - Statewide and county solid waste information accessible on the web.
 - County recycling rates, county figures on pounds / per-capita recycling and disposal.
 - Comparisons including graphs.

Summary of Comments on Goals

- Make goal: WA seen as a leader among other states because of forward-thinking innovative plans.
- More local oversight and decision-making regarding goals, hierarchy, and management methods.
- More consistency between ECY and Jurisdictional Health Districts to work with permittees to recycle and reuse waste to achieve Plan Goals.
- Support zero waste local governments. Are zero waste goals realistic?
- Recycling goals (50%) becoming more difficult to meet; should also include reuse and make it the three “Rs”.
- Set clearer goals in the new plan. Want specific, achievable, measurable, objectives that can be implemented locally, with guidelines for what can help meet goals – and what doesn’t. Counties are not sure if they can hit goals. A realistic view from the state is good.
- Don’t set hard and fast goals, focus on continuous improvement.
- Legislative restrictions on how waste is handled contradict goals, should be re-evaluated.
- Need high-level goals; need clarity in the state plan that all materials should be recycled if possible, not just those that are toxic. Garbage is not the goal. Waste prevention and recycling is the goal.

Summary of Education / Outreach / Technical Assistance Comments

Educate Youth

- Need K-12 education. Youth outreach/education emphasis is ongoing and needed. Bring back *Away with Waste*. Focus on Reduce-Reuse-Recycle with an emphasis on Reduce-Reuse. General sustainability emphasis embedded in larger school curriculums.
- Expand the Ecology Youth Corps.

Educated Residents – Households and Businesses

- Need general public education, better and easier access to information for residents, both households and businesses.
- Promote recycling. Show public how easy recycling is, focus on how to do materials separation: plastics, organics, glass, etc. Make it easier for people to know what / how to recycle.
- Show people what happens to their recyclables. People need confidence that what they're putting at the curb actually gets recycled. Currently, they don't believe it actually gets recycled.
- Focus on behavior change: focus at the point of material separation; focus on issues around consumerism. Education on the economics of recycling.
- Increased availability of information to the public to allow better product choices. Better product labeling so people know what they are buying. What contains specific toxins? What is / is not recyclable? What is household hazardous waste? What are safer alternatives?
- Cultural emphasis - we need to consider other languages and cultures.
- Need more education provided by collection companies with feedback to customers. Require them to provide detailed educational materials to customers on recycling in the unincorporated areas. Require garbage haulers/recyclers to send a notice once a year to its customers about what is actually being recycled and why or why not.

Education for Local and State Government

- Better training for local CPG coordinators. Training for recycling coordinators. Consistency - provide template. Just say "No" to contaminants in recycling.
- Improve communication channels between levels of government. Increase communication between different agencies and organizations that deal with solid waste to share latest info. Education on what's being done.
- Help employees develop and advance knowledge and skills.

Technical Assistance

- Provide more technical assistance – look at how can we help. Need to provide technical assistance and education that is backed up by enforcement.
- Offer clearinghouse / consulting services for local jurisdictions when new ideas emerge that could be locally based. Analyzing new ideas locally is beyond our abilities; ECY assistance would be helpful.
- Case studies wanted. Include examples of successful approaches others have used to address various issues. We need examples somewhere; arrange by materials online or in a searchable database.

Education Campaigns and Outreach Techniques

- Well-funded education campaigns. Use community-based social marketing in campaign development.
- Use a variety of media types - social media, TV, PSAs, video. Outreach and education through technology. TV advertising from the state would be more effective than small articles in the paper.
- Innovative advertising approach to change behavior. This can work better than regulations or data sometimes. Create apps for recycling (where to take materials; how to separate materials).
- A comprehensive, updated website portal of information. Provide information on everything from where to take C&D debris in rural (or any) counties to how to separate different plastics.
- Create materials for local governments to adapt. State-developed materials will assist in consistency of statewide messaging.
- Focus on litter.

Messages and Messaging

- Use clear and exact language. Develop good graphics (use a designer) and good presentations.
- Emphasize cultural competency and language.
- Focus on communication in rural areas.
- Make the case for waste reduction!
- Address consumerism – recognize it as the fundamental problem.
- Focus our priorities and outreach like Environmental Priorities Coalition does. Coordination on education.

Summary of Organics-Related Comments

Why/How to Address Organics

- Address highest impact; biggest amounts of waste - for example, organics. Maximum diversion of organics from landfill disposal. Ecology should take a leadership role in organics processing, including anaerobic digesters and helping with regional solutions. Need a holistic organics section of the plan.

Compostable Packaging

- Improve compostable packaging and compostable product labeling. Would Extended Producer Responsibility (EPR) help?
- More research; more support for new products/technology. Is compostable packaging really OK?
- Eliminate compostable packaging.

Improve Organics Infrastructure

- Address statewide infrastructure needs for composting organic materials; build organics recycling infrastructure across state. Make sure there is infrastructure to meet targets. Look at what organics infrastructure we have versus what we need. More grass clipping, leaf, and other yard waste collection sites. Help industry/counties with starting commercial compost facilities.
- Organics certification similar to or more rigorous than Oregon Tilth.

- More woody debris collection sites instead of open burning of logging slash or orchard debris. More utilization of woody debris at compost facilities, pulp and paper, and hog fuel. Increase organic recycling locations.

Food Waste

- Food Waste Diversion: donation, curbside, prevention, education, stimulus. Facilitate food donation connections. Goal: All good food donated.
- Organics management has suffered during the last five years, yet is more important than ever due to the big impact of food waste in greenhouse gas production and the need to improve agricultural soils. New approaches to these problems are needed.
- Food waste is seen as a West Side issue. The state plan should focus on challenges that are pressing throughout the entire state.

Organics Bans

- Discuss the option of a statewide disposal ban on certain types of organics in the landfill (such as yard debris and food scraps).

Anaerobic Digestion (AD)

- Review anaerobic digester regulations. Encourage dispersed anaerobic digestion operations. There is interest in small scale anaerobic digesters (for example, food processing on campuses), but the capital investment is prohibitively high. Do some analysis and reduce that barrier.
- Funding support needed for new technologies such as AD for organics.
- Waste Water Treatment Plants (WWTP) - lots of them need updating; most don't have AD. This could provide options for food wastes. Need new thinking in development. How do we work with local government, financiers, engineering firms who do design and regulators to design new ideas and technologies at WWTPs for AD.

Composting

- Composting has been oversold as a waste management technology. Accurately reflect the issues with composting in plan; help make it more financially stable.
- Solve odor problems and toxic pesticides contamination in large scale composting facilities and processing capacity for food waste composting facilities. Talk about success and failures such as organics at compost facilities. Learn from others; exchange information.
- Huge range of composting actions in counties. Plan should reflect range of options, not one size fits all. Compost not only answer – focus on others. Consider inverted triangle of organics management. Emphasis on backyard composting.
- Commingled recycling collection system (both commercial and residential) a problem for composters.
- Pressure on composting facilities to take more may be counter to composters' goal of great end product. Guidelines have been established by composters, readily available and include why some things cannot be accepted.
- Create markets for compost. Compost training: we start with materials, but maybe we need to think of what we want for market and how we will use it. There are often stricter regulations for the recycled product than for the virgin product. (for example, compost vs. fertilizer).
- Subsidize the use of commercially produced compost on agricultural lands.

BioEnergy / Biofuel / BioChar / Biochemicals

- Use organics to create biofuel for vehicles or electricity through burning methane. Fund / support organic waste-to-fuels / -energy outcomes or biorefinery – ex. Lane County, OR. Biomass gas production – interest might increase due to limits of natural gas pipelines. Promote food waste recycling as a source of energy; with positive outcomes: local, renewable, clean, etc.
- Look at smaller applicable projects locally turning into new industries and connecting waste streams.
- Bio-chemicals – Most promising long-term market trajectory. WISERG example: Anaerobic digester for food waste on site. PCC Natural Markets is doing this and selling liquid fertilizers. Decentralized digesters meet different needs and provide distributed energy.
- BioChar is an opportunity: can we convert waste into bio-char?
- In organics policy, include a strong statement on highest and best use, avoiding jargon. Avoid diverting to fuel, fend off incinerator industry. For bio-energy, we don't want to set up models where we are forced to feed the beast with organic waste. Also, co-products need to be used.
- Who owns the garbage? Relates to renewable energy = commodity. Regulated as garbage or something of value? Ownership is with collectors – but regulated.

Biosolids

- Regulatory consistency for biosolids and composting for municipal and industrial.
- Biosolids are bad when applied to land or when they get into water.

Summary of Recycling-Related Comments

Curbside Recycling

- Evaluate alternatives to single-stream recycling. Maybe a hybrid or dual-stream system – single-stream drop-off centers for some materials (glass) and single-stream for things easy to separate. Commingled curbside has increased diversion and contamination.
- To optimize curbside, expand services, use three-sort system (recycling, organics, disposal). Ideal system has universal, widespread and convenient curbside (recycling and organics), drop-off, take-back and stewardship programs for nearly all materials for residents and small businesses.
- Continue curbside recycling – paper, metal, plastic, and yard / food waste.
- Simplify the list of acceptable materials. Consider using state regulations to achieve this.
- Add more items in curbside recycling.

Consistent, Easy Recycling

- Improve consistency for what recyclables get collected, for bins (color coded), and for education statewide. Set common standards for what to accept and how to collect curbside but allow for local flexibility. Different recyclables in different areas is confusing.
- Collection companies should have more requirements for consistency – including outreach.
- Recycling should be as easy as purchasing or throwing away.

Rural Recycling

- Support regional hub and spoke systems for processing facilities to reduce the cost of transportation in rural WA. This will help implement programs in underserved parts of the state.
- Subsidize the cost of running curbside recycling services in small rural communities.
- Lower the service expectations for curbside and recycling services of urbanites moving into their rural communities. Can't have mirror-image programs in rural and urban areas.

Recycling Revenue-Sharing

- Have more counties use revenue-sharing agreements with WUTC franchised collection companies to increase recycling. Right now only three counties have revenue-sharing plans. It's a tool counties can use to advance recycling goals.

Recycled Content and Design for Recycling

- Make more products with recycled content. Consider requiring manufacturers to use recycled content in their products. More guidance to close the loop with recycled content materials.
- Consider product standards that prevent mixing of non-recyclables with recyclables.
- Move upstream - design for recycling. Replace non-recyclable materials with recyclables. Manufacturers should not be allowed to produce what can't be recycled. Manufacturers should design products for repair, then recycling, never disposal. Redesign common products so they are recyclable with minimal handling, or reusable.
- Eliminate single-use consumer goods that are not recyclable or compostable.

Recycling Regulations

- Every waste collection company should be required to provide recycling. It should not be an option for cities and counties to initiate recycling.
- Typical recyclables (paper, plastic bottles and tubs, metals) should be banned from disposal.
- Regulations should encourage and aid recycling; presently they hinder it.
- Keep strong standards for design and operation of all solid waste facilities, include recycling facilities, which can be a mess. Make sure operations are truly protective via reporting requirements and performance monitoring.

Commercial, Multifamily and Public Space Recycling

- Clarify commercial recycling. WUTC does not regulate commercial recycling, but local ordinances can mandate businesses to recycle.
- Free and accessible public spaces to take recyclables in the state – make more convenient.
- Require more recycling in schools and government offices, with staff to ensure materials get to the right place. The same with private industry. Get more restaurants to recycle more of their waste.
- Focus on multi-family sector. More exploration of how to support multi-family residents.

Plastic Recycling

- Plastics are a problem. Variety of plastics is an issue; coding is confusing; not enough types are recycled. Films, layered plastics are not recycled and increasing in use. More clarity on which plastics are recyclable and which aren't.
- The green fence in China has hurt plastics recycling. Research end use of plastics: recycling or energy or garbage? Plastic to fuel is a viable option.

- Hard to get good plastic types 1 and 2 out of commingled recycling. Market for mixed plastics is bad, you barely break even. Is it worth collecting 'iffy' materials, such as plastic bags and 3-7 plastics?

Glass Recycling

- Something needs to be done about glass – very problematic – need viable solution. Glass in single stream is bad. Drop boxes are good but costly. Picking up glass on the side means running a second vehicle. Look at two-stream curbside? State could recommend all commingled programs keep glass out.
- Some places don't take glass. Some take it, but it's not really recycled. Hard to find facilities willing to take glass.
- Require glass recycling opportunities in each county.
- Consider doing away with glass altogether, or take it back to the store.
- Consider bottle bills.
- Find end uses for glass. Pilot glass in concrete mix. Require state contracts using fill to require a certain percent of glass aggregate. Use crushed glass for road-base.

Material Recycling Facilities (MRFs)

- Need to have MRF standards in place: bale break reporting or statewide "certification." All exempt facilities should be inspected by locals or have verification/audit mechanism for reporting recyclable rates that confirms the exemption status of these facilities.
- Funding mechanisms to increase investments at MRFs to reduce yield loss.
- Wants MRFs to take more items, like carpet.
- Define where MRF sheds are to determine where similarities/consistency could occur/be possible
- Producers are unaware of problems they create at MRFs, etc.

Contamination Concerns

- Get to true recycling not just collection. Garbage gets counted as recycling. Emphasize keeping recycling stream clean. Protect value of secondary materials. Quality versus quantity for recycling.
- Quality of feedstock is down since commingled recycling has increased residuals. Desire to make recycling easy for masses, but the value of commodities goes down. Profit disappeared for recyclers; MRF gets lots of trash, and this hurts paper mills, other recycling equipment.
- Regional commingling work being done now by stakeholders is really important.
- Need accountability that shipped recyclables are actually getting recycled.

Funding Recycling

- Need a new funding source for recycling. Funding recycling with disposal dollars not sustainable. If you increase tip fees, fear it can lead to dumping.
- People don't want to pay for recycling, feel entitled to free recycling. Need to educate the public about the economics of recycling. They feel that if they recycle more, they should pay less.
- Recycling needs to make financial sense.
- Add costs of recycling on the front end of the product to ensure it is disposed of properly.
- Would help to have temporary way to subsidize the cost of recycling programs when commodity prices drop for short periods of time.

Recycling Research

- Fund research to solve recycling issues and develop new technology and markets.

Sham recycling

- Focus on sham recyclers - enforce and clarify.
- Fully implement transporter law provisions – great tool for ECY, locals, industry. Share data on registered transporters.

Summary of Construction & Demolition (C&D) Debris Comments

- Maximize diversion of construction materials from landfill disposal. Increase recycling in demolition / remodeling.
- Need more people working on C&D. It's 40% of the waste stream. Let's commit more resources to working on it and more synergy with staff who already work on it. Ecology should support recycling and / or reuse of C&D debris.
- Address statewide infrastructure needs for recycling of construction waste. Be clearer where folks can find information about it.
- Need a way to finance the work on C&D debris.
- Can wood waste be chipped, recycled or used for biofuel? There are no options for wood disposal at a reduced rate. A designated dumpster for wood products seems to make sense.

Summary of Recycling Markets Comments

- Address the role that markets play in the recycling world and assist with development. Help with market development for recyclables. State has more clout to drive markets than smaller jurisdictions. Focus on recyclables with volatile markets or have illegal dumping issues. Create sustainable markets for glass, plastic, mattress, carpet, and wood recycling.
- Need incentives to create markets, recycle and purchase recycled products.
- Need statewide entity to develop local recycled-content manufacturing and market in WA, as in other states and regions. Perhaps revive "Clean Washington Center" or combine university and business programs.
- Analyze markets. Inform locals about what markets are doing so they can plan accordingly.
- Quantify and publicize economic benefits of local recycling industry so WA develops a "Recycling Industry Sector."
- Perhaps take action to support markets when they're not doing well through funding / subsidies.
- Losing markets in China; need to find new markets. Allow flexibility with changing markets. Recycling markets vary, so not all defined recycling can always get recycled.
- Build local reuse / recycling economy so that we can reduce / eliminate export of our waste. Concerns about lack of social or environmental oversight overseas and greenhouse gas (GHG) emissions from shipping material to China.
- Economic recycling of "recoverable materials." While we can "plan" all we want to, the economy dictates what we can recycle.

Summary of Waste Disposal Related Comments

Disposal Options

- Explore more disposal options. Allow some flexibility regarding disposal options, especially for residuals of common products.
- Don't haul waste so far; make a landfill in western WA.
- Street waste standards need to be consistent with MTCA and soil-reuse standards.

Waste to Energy (WTE)

- Provide for alternatives to landfill – (for example, WTE facility).
- Reflect that WTE is really a green industry and should be considered a form of recycling, move up the hierarchy. WTE reduces greenhouse gasses as opposed to landfills.
- Incineration should be treated as a viable option for disposal and an opportunity for economic development centered around decommissioned coal-fired power plants. Spokane's WTE is a successful economic development asset to the entire state.
- MSW WTE facilities need lots of source separation beforehand. The German model focuses on reducing and recycling first. Incineration can suck in a lot of recyclables.

Dumping / Litter

- Address illegal dumping, which is a big problem in some economically-disadvantaged areas. Eliminate illegal dumping and make sure that what does get disposed is done so properly.
- Recommendations to help with litter – more money spent on more litter crews and litter tickets. A strategic plan for dealing with roadside trash.

Summary of Infrastructure & Transportation Comments

- Make sure infrastructure is in place for programs Ecology proposes and to meet targets set in plan. Ability to use grants for infrastructure would help with rural recycling.
- Include landfills and transfer stations in plan (current state plan is not about this). Current infrastructure, public or private, including curbside, should be used as foundation and built upon for future / new services.
- Cost of transportation a concern, especially in rural areas. Doesn't make sense financially for many. Suggest regional hubs to help.
- Want adequate processing capacity for recycling and composting for all regions of the state. Help develop industries that could compost the products in WA or the Pacific Northwest: construction wood waste, paper, plastics.
- More end use emphasis and less intermediate facility emphasis.
- Increase waste to energy systems (incineration, biogas).

Summary of Regulations, Enforcement & Definitions

Comments

Regulations

- Regulatory approach should be fact-based; positive, not punitive.
- No new regulations. No unfunded mandates.
- Mandates needed to encourage waste reduction, require recycling, address toxics.
- Don't let regulations be barriers to innovation.
- Appropriate levels of regulation (in some cases regs are too strict – in others too lenient)
- Regulations for Illegal dumping - more regulations and enforcement on illegal dumping (increase penalty), backyard burning and backyard burying of waste (stop allowing this.)
- Economic development should be a criterion for formulating regulation.
- Find ways to address inconsistencies in rules. Improve clarity. No conflicting regulations.

Oversight/ Enforcement

- Adequate and consistent oversight over the operation of facilities. Permitting and compliance need to talk with each other.
- Regulatory standards for recycling / facilities – better design standards, more consistency in permitting, with some flexibility when regulating solid waste facilities and operations. Encourage MRFs but have some oversight. Align ECY and JHD diversion goals.
- Need more and better enforcement, coordinated and consistent. Encourage local role and have stronger compliance effort at state level. Increase consistency between county and state. Set a floor of what is acceptable.
- Consider how regulations will be enforced; take into account online commerce.
- Ecology could check the data from reports to see if the companies are truly recycling. A level playing field is important and the reports can be a tool to see whether facilities are doing as they say.

Definitions

- Define solid waste. When is waste no longer waste? Define when a recyclable solid waste becomes a product or commodity and ceases to be a waste. Need to address this.
- Change how recyclables are defined. The definition of what constitutes recycling is different across the state. Designated recyclables list is within county plans. The definition of what constitutes recycling should be the same across the state. Need some uniformity across state or jurisdiction of list of recyclables so MRFs can plan, sort.
- Difference between *recycling* and *recyclable* is fundamental. Glass as an alternative daily cover is not really recycling.

Summary of Comments on WA Utilities & Transportation Commission (WUTC)

- ECY and WUTC need to work more closely together. Harmonize solid waste policies, implementation and data; reduce disconnect between WUTC and ECY on rates and disposal.

- Review WUTC laws and cost assessment - are they still appropriate? Are there more creative systems for franchising and contracting with local haulers?
- WUTC should provide oversight on quality and success of regulated services and get more public input. Peer benchmarking. Hold recycling system to higher standards.
- WUTC should increase requirements on haulers for outreach and analysis.

Summary of Local Waste Plan Comments

- Local plans are important and can drive innovation. Problems include list of recyclables; non-applicability to tribes.
- Want flexibility in planning and implementation expectations. Need less frequent updates - 7 or 10 years. Keep guidelines current and useful.
- Clarify the relationship between the state and local plans. It is difficult to identify links.
- An Emergency Response Plan, with guidance on disaster debris that allows for quick recovery should become a mandatory part of a county's Solid Waste Management Plan.

Summary of Comments Regarding Urban & Rural Issues

- One size does not fit all!!!
- Consider rural needs and limitations. Rural communities need resources and technical assistance for recycling programs, infrastructure and education. No local markets; high transportation costs; quantities too small; limited infrastructure (or even curbs!). May want to consider rural communities as underserved.
- Smaller, rural solid waste jurisdictions feel they could benefit from more direction and suggestions from Ecology - and better listening as well.
- Recognition of individual differences among different regions of the state – not everyone has the same environmental view as larger, more progressive counties.
- Analyze urban vs. rural: Is the recycle rate different? What are the barriers? Are any regulatory? What could be improved?

Summary of Roles & Responsibilities Comments

Local and State Roles

- Increase partnerships and coordination. Improve collaboration amongst jurisdictions.
- Consider what can be done at the state level that locals can't do; or split between west/east, urban/rural, to establish most effective efforts. Include studies and analysis, such as commingled recycling work groups. Plan can identify other areas state can lead. Flexibility is important, but there are broader universal things that make sense to do on a statewide level that locals may not otherwise be empowered to do. Examples: processes that help stakeholders come together to determine a path forward.

- Leaving too much material management to locals can be more costly and ineffectual. Some solutions for waste prevention and recycling may need to be at state level.
- Need to standardize a few things. Address more universal topics in state and allow for local individuality. Provide solid direction to local government – but allow for flexibility in implementation.
- The state should have some authority to at least take a position and recommend or strongly suggest certain waste management methods, even if don't have direct enforcing abilities to make those suggestions reality.
- Tag or otherwise call out plan recommendations that fall to local governments to implement.
- Need defined actions at local and state level – and have some kind of accountability.

Ecology's Work

- Ecology needs get out of silos within and without of programs.
- Be transparent; be a leader; work with others (Department of Health, Department of Environmental Quality).

Private Industry and Government Roles

- Figure out the appropriate roles for government versus the private sector.
- Respect private industry knowledge. Companies especially in rural areas that have been in garbage and recycling for 60 years might have some knowledge that ECY and local governments do not have. Family businesses that know garbage and recycling and private industry.

Summary of Sustainable Materials Management Comments

- Sustainability should be taken into consideration for new programs. Collaborate and leverage other's work towards goal of sustainable materials management. Make more people aware that recycling is often down-cycling and isn't the ideal solution.
- Explore some new thinking about waste as materials. Look at waste with different paradigms. See waste as materials with value to someone, somewhere in the production/consumption cycle. If we treat solid waste challenges as materials and design challenges, we would make more progress in heading off some of the negative consequences of an end-of-pipe focus on waste. Consider waste as a "resource" and not just inefficiency.
- Think about what materials will be generated in the future and how they will be collected, processed, etc. Any material that can be processed into a sellable/useful product locally should be supported with grants, education, and funding.
- Work hard to get manufacturers to see the logic of waste reduction and materials management and get them on board to take it to the "next level." What is happening is not enough.

Summary of Comments on the Waste Hierarchy

Waste Prevention

- Preserve and defend the statutory waste hierarchy. Increase the visibility of the hierarchy in the state plan and be more explicit about how we intend to support that hierarchy. Waste prevention is supposed to be top on the hierarchy, but not mentioned much and confused with recycling. Emphasis on prevention should be continued - Before Waste Plan. Emphasize that reducing waste is the most important thing.
- Use Lean to prevent generation of waste as Japan does.

Reuse

- We do not have the option to prevent or reduce many waste materials ... so then next focus should be on reuse as per the waste management hierarchy.
- Reuse must be seriously considered, and support for reuse should be emphasized. Promote repair and reuse networks within the state. Focus on sharing economy.

Summary Climate Change/ Environment / Life Cycle Comments

Climate Change and Other Environmental Concerns

- Increased focus on climate change connection and GHG emission reduction. Make strong connection between climate change impacts and use of recycled-content materials.
- Dealing with climate change adaptation and mitigation needs to be the focus of the state plan. Include concepts from Climate Action Team (CAT) work in 2008.
- Add GHG emissions to prioritizing materials. Toxicity may be benign, but it could be terrible on GHG emissions.
- We should be very concerned about the impact on the oceans and marine life.
- Make connections between products and environmental contamination.

Life Cycle Approach

- Use more Life Cycle Assessment tools to help us develop our public policies related to solid waste management practices that are based on good science.
- Life cycle information / studies for each type of product. (For example, where does “recycled” plastic go, what does it become, what are health and environmental implications (global)?)
- Don't go overboard in designating materials to be recycled. Keep lifecycle analysis in mind.

Summary of Big Picture Thinking Comments

Think Big – Or Don't

- Time to take the big step and announce that WA's goal is to reach zero waste by some date. We have made huge progress so far, so let's continue to be audacious and be the first state in the country to formally announce a goal of zero waste. If big manufacturing plants can do it, so can we.
- Reach out to a broader audience that does not necessarily see itself as part of the solid waste problem or solutions, but rather as a feedstock supplier or user. This includes manufacturers (aerospace, trucking), food service, renewable energy, agriculture, municipal wastewater, etc.
- Keep thinking "beyond waste". This approach will benefit humankind and our biosphere; it won't be easy or cheap at first, but the cost savings will show themselves and environmental problems will be reduced.
- Sustainability should be the plan's main objective and guiding system of organization.
- Reduce the plan's scope to deal only with legislatively mandated activity.
- Minimize expectations of local implementation on local governments.

Look at Other States and Countries

- Examine and incorporate relevant actions from the OR plan, as well as BC and CA approaches; build regional synergies. Other state plans or recent legislation that has taken significant steps towards higher recycling should be reviewed also and possibly referenced (VT, CA).
- Look to the EU and other countries for what they are doing. Synthesize and integrate more information on successful reduction, diversion, and recycling programs in other states and countries. Think about the global impacts of waste and how we can influence them.
- Study all aspects / effects of end use in countries buying materials – perhaps a state initiative (effort, not law) to begin a product responsibility program of sorts to make sure we aren't increasing pollution worldwide.

Consumer Culture Change

- Make consumerism work for us. We are all in this together – not good or bad guys – we all buy products.
- Country is ripe for cultural change.
- Look at waste as material expression of the human condition and expectations and dealing with waste by dealing with those issues.

Summary of Moderate Risk Waste/Toxics/Hazardous Waste Comments

Moderate Risk Waste (MRW) / Toxics Regulation

- Improve consistency between solid waste and hazardous waste regulations. Conflicts include the definition of solid wastes and coordination of Universal Waste with solid waste rules. Update regulations to provide clarity.
- The name, moderate risk waste, needs to be changed to reflect that these wastes are not really "moderate." Why are household hazardous wastes (HHW) and small quantity generator wastes considered "solid" waste?

- EPA says you can dispose of MRW in landfills; it is ok to dispose of MRW in lined landfills.
- Change the law that allows MRW in landfills; consider banning MRW from landfills.
- Support new laws to address getting toxics out of products, such as state Toxic Substances Control Act, better consumer labeling, etc. Legislate toxics out of products. Focus on or ban specific toxics including those that impact water, fragrances, pesticides that are for aesthetic use, flame retardants, triclosan and triclocaban. Update the persistent, bioaccumulative toxics list.
- Update the dangerous waste rules, as they are a barrier to new green products and innovative technologies.
- In certain areas, the rules need to be stricter, as with polychlorinated biphenyls (PCBs) and MRW, and with other areas they should be less strict to promote new technologies and products.

MRW / Toxics Funding

- Better and more stable funding for MRW (facilities, operations, collection events, etc.) Pay for MRW disposal. Need money to handle especially difficult waste streams.
- Provide financial incentives for better product design, such as product fees and tax breaks to motivate businesses to do the right thing.

MRW / Toxics Product Stewardship

- Have more product take-back at retail.
- Product stewardship is an important tool for increasing recycling, getting toxics out of products and helping to finance MRW facilities. Get product stewardship programs to work with existing MRW programs. Address more products such as pharmaceuticals, paint, batteries, mercury lights, and syringes.
- Consider going after the chemical, not the product.
- Work more with manufacturers and make them more responsible for their actions.

Toxics in Products

- The state plan should address toxics and toxics in products more than it does now.
- Work upstream to ensure there are safer chemicals in products and to design toxics out of products. Toxics in packaging are also a concern. How can we influence product design (other than product stewardship)?
- Need stronger links (and data) between toxics in products and human health and environmental contamination.
- Support alternatives assessment; promote green chemistry; promote EPP; use / promote / advance the precautionary principle; better labeling of toxics in products.
- Sensitivity to the word “toxic” – don’t overuse and don’t apply inappropriately.

MRW / Toxics Education

- More education about HHW: why it’s dangerous and where problem materials can be taken. More consistent messages and information about products, risks and environmental contamination. Need more focus on MRW prevention and non-toxic alternatives to common products.
- Get retailers and manufacturers involved with toxics education. Consider MRW education at point of sale, where we need to tell people of the hazards of use of the product similar to what happens at pharmacies.
- Establish toxic prevention training for businesses and workers, possibly at community colleges.

MRW/ Toxics Data and Measurement

- We need more information on what is in products (what are the risks during manufacture, use, and end-of-life phases).
- Hazardous waste recycling requirements, including data tracking, need to be examined, clarified, and modified.
- Be aware of using tonnage; one ton of concrete does not equal one ton of mercury.

MRW / Toxics Infrastructure and Services

- Increase MRW service levels and provide better access to disposal for toxics; collection facilities and events, and even curbside pick-up. Support waste-mobile operations. Explore curbside MRW collection. There is uneven MRW infrastructure and service equity across the state - provide assistance to smaller jurisdictions.
- Promote collaboration/coordination between MRW programs.
- Concern about funding for MRW facilities and how to reduce costs and provide permanent funding. Storage requirements versus liability are a concern for smaller MRW collection facilities.
- A variety of wastes are still difficult for some folks to manage correctly. They include ammunition from shooting ranges, sharps, pharmaceuticals, and syringes.

Pollution Prevention (P2)

- The P2 law and regulations need to be updated to make them broader, and address new toxic substances.
- Prioritize waste and toxics prevention programs in local and state programs. All businesses should have a waste and toxics prevention plan submitted with their license and annual progress reports with annual license renewals.

Summary of Environmentally Preferred Purchasing (EPP) (also known as Green Purchasing) Comments

- Use public procurement opportunities to spur market demand for products such as local compost and recycled asphalt roofing for roads. EPP, including authorized as “green” lists for purchases, is an important tool that we should be using. Support Federal Green Challenge.
- Support EPP for consumers and to combat culture of consumerism.
- Label products in store, for example, hazardous when disposed, recyclable, biodegradable, etc.
- Need more information about human health risk; full disclosure of contents and risks of using, handling, disposing of products.
- Develop green products: need clear pathway for the development of green products that takes into account lifecycle costs / analysis, and plan for used products.

Summary of Product & Producer Related Comments

Producer Responsibility and Product Stewardship

- More product stewardship needed. State role to look at systemic change: producer responsibility, lifecycle management, improved product design, green chemistry, safe products legislation, product bans, better consumer labeling, safer alternatives and making good choices more accessible to consumers.
- Support for additional product stewardship programs, to include: carpet, paint, mattresses, difficult-to-separate composite construction materials, batteries, toxic products, and packaging.
- Plan should explore how we move from a waste management to a product stewardship expectation in our planning.
- Only consider product stewardship for toxic and hard-to-handle products (narrowly defined).
- Product stewardship is difficult, as businesses are not necessarily willing to support it.

Packaging

- Reduce packaging, create recyclable or compostable packaging. Extended producer responsibility (EPR) as a possible solution.
- State should be actively involved with industry initiatives to improve recycling of packaging, harness these efforts for financing system improvements.
- Should have packaging stakeholders from industry involved as we work on this.

Bottle Bill

- Implement a bottle bill – use the bottle bill deposit model for other items. Statewide bottle bill is overdue and the granddaddy of producer responsibility.
- Recycling drop-boxes for glass are better than bottle bills.

Product Design and Standards

- Product standards that prevent mixing of non-recyclables with recyclable materials (for example, containers that mix foil with paper or plastic). Simplify type of plastics. Push for producers to use more recyclable materials in their products, specifically packaging.
- Shifting focus upstream to product design is appropriate and necessary. Incorporate "design for disassembly" concepts.
- How can we shift away from our “waste” view to a “product” view (given our authorities) and ultimately to a “design” view?

Bans on disposal and use

- Consider more disposal bans on easily recyclable materials with markets.
- Product use bans on difficult items (plastic bags, Styrofoam containers). Have model ordinances, state support of local ordinances; commit to seeking statewide bans.

Summary of Equity & Diversity Comments

- Look at service equity. Define traditionally underserved communities, maybe include rural communities, and especially related to HHW disposal (not all people can drive to depots).
- Include strong statement and plan of action for service equity in grants. Consider making that a CPG grant element/requirement.
- More programs, scholarships and other opportunities to encourage diversity and inclusion in the solid and hazardous waste industry.
- Look at the demographic that is affected by solid and hazardous waste with a culturally competent lens and dedicate time, resources and energy to reaching those most affected by the issue.
- Would be useful to have ECY include the steps that are taken to reach out to underserved communities and address barriers of language, legal status, etc. Include statewide social justice plans to address recycling / waste generation.
- Survey work or focus groups may be useful when looking at underserved populations; lots of lack of awareness (even just the differences between solid and hazardous waste), why it makes a difference. Get more data about people's impressions.
- Translate the plan into Spanish, maybe Vietnamese or other languages.

Summary of State Plan Scope & Structure Comments

- Change the name of the plan; do not call it "Beyond Waste." Call it the State Plan. Call it "Before Waste." The name Beyond Waste is okay once you understand it.
- The state plan perspective needs to be broad, global, big picture and locals need to individualize. If it is too specific at the state level, it will make it difficult to operate. The "state" plan should address more universal topics – set the tone but allow for local individuality.
- The plan should provide a framework that can help achieve regional consistency, not county by county. Recognize everyone wants to do it their way, but problems cross boundaries.
- Be bold in taking next steps. We are still only halfway there. Look at and build on what's worked to move forward.
- Need to make clear connections to benefits.
- Plan needs to achieve a better balance between operational concerns of the current system and goals for a future alternative. Plan needs to be holistic and should be structured around people, communities and systems, not around regulations.
- William McDonough ideas need to be in the state plan. Technical cycle and organic cycle. Manage things in cycles and loops.
- Use clear communication and make the plan connect clearly to our work, grants, etc. Include more specific guidance about how to implement recommendations in the state plan at the local level. Clearly identify recommendations that fall to local government to implement.
- Some confusion about the intended audience for the plan; be more explicit about this.
- Focus on a few big and challenging issues and don't address so many challenges at once. Pick top 2-3 items and really focus with stakeholders. The scope of the plan exceeds our financial and technical capacity to implement it in many cases. Don't spread resources too thinly.
- The plan should contain a prioritization of materials to address and help identify what we should focus on in future. When selecting waste streams to address, focus. Look at volume and toxicity and set priorities.

- Make the plan shorter and simpler, with fewer recommendations.
- Plan needs an educational component.
- Have an electronic and online version of the plan that would include hyperlinks to helpful supporting data.