

Plastics post-consumer recycled content Workload Analysis for fiscal year 2025

Background

[Current law](#) requires the Department of Ecology (Ecology, us) to prepare an annual Workload Analysis (WLA) for public comment. The WLA identifies the annual costs we expect to incur to implement, administer, and enforce the post-consumer recycled content requirements.

This WLA estimates annual costs for Fiscal Year (FY) 2025 beginning on July 1, 2024, and ending on June 30, 2025.

Our workload is estimated for two activities:

- Program Administration.
- Post-Consumer Recycled Content (PCRC) Oversight.

Below is a summary of our estimated costs for both activities, and additional detail is provided on the following pages.

Table 1: Summary of estimated costs by cost category and workload type

Cost Object	Program Administration	PCRC Oversight	Total
Salaries	\$117,889	\$144,252	\$262,141
Benefits	\$40,200	\$49,190	\$89,390
Goods and Services	\$8,770	\$9,374	\$18,144
Travel	\$3,197	\$3,418	\$6,615
Equipment	\$1,865	\$1,993	\$3,858
Annual Data Purchase	\$0	\$30,000	\$30,000
Assistant Attorney General	\$5,220	\$46,980	\$52,200
Agency Administrative Overhead	\$47,111	\$57,646	\$104,757
Total Costs	\$224,252	\$342,853	\$567,105

Estimated costs for program administration

Program administration workload includes the following:

- Providing technical assistance for annual registration and ensuring compliance with registration requirements.
- Developing and posting the annual workload analysis and responding to public comments.
- Calculating and administering the annual fee.
- Maintaining the registration online platform and database.
- Completing initial rulemaking and conducting rule updates as needed.

Tables 2 and 3 summarize our workload assumptions for the next fiscal year, and the resulting cost estimates.

Table 2: Estimated program administration workload by position and Full-Time Equivalent (FTE)

Position	Job Classification	Role	Standard Salary	FY 2024 FTE
Plastic Packaging Subject Lead	Environmental Planner 4	Provide oversight and coordination of program administration	\$95,654	0.30
IT App Developer	IT App Development - Journey	Maintain the registration online platform and database	\$107,149	0.05
Technical Assistance/Compliance	Environmental Specialist 3	Provide registration technical assistance, fee administration, and enforcement of registration and fee requirements	\$74,729	1.00
Workload Analysis Lead	Budget Analyst 4	Prepare the annual workload analysis and assist with fee calculation	\$91,068	0.10
Agency Administrative Overhead		See notes on costs in the table below		0.22
Total FTEs				1.67

Table 3: Estimated program administration costs by cost category

Cost Object	Description	Estimated Cost
Salaries	Salaries are based on the estimated staff time and the current biennium actual salary rates for the listed positions, at step L.	\$117,889
Benefits	Benefits are the agency average of 34.1% of salaries.	\$40,200
Goods and Services	Goods and Services are the agency average of \$6,048 per direct program FTE.	\$8,770
Travel	Travel is the agency average of \$2,205 per direct program FTE.	\$3,197
Equipment	Equipment is the agency average of \$1,286 per direct program FTE.	\$1,865
Assistant Attorney General	This estimate is for the workload in the Office of the Attorney General for Assistant Attorney General (AAG) legal counsel regarding rulemaking and enforcement of registration requirements.	\$5,220
Agency Administrative Overhead	Agency Administrative Overhead is calculated at the federally approved agency indirect rate of 29.8% of direct program salaries and benefits. Agency Administrative Overhead FTEs are included at 0.15 FTE per direct program FTE.	\$47,111
Total Costs		\$224,252

Estimated Costs for Post-Consumer Recycled Content (PCRC) Oversight

Post-Consumer Recycled Content (PCRC) Oversight workload includes the following:

- Providing Technical Assistance for PCRC requirements and annual reports.
- Reviewing and posting annual report data.
- Developing and maintaining the annual reporting online platform and database.
- Reviewing requests for PCRC rate adjustments and temporary exclusions.
- Aiding compliance with PCRC requirements.

Tables 4 and 5 summarize our workload assumptions for next fiscal year, and the resulting cost estimates.

Table 4: Estimated program PCRC oversight workload by position and Full-Time Equivalent (FTE)

Position	Job Classification	Role	Standard Salary	FY 2024 FTE
Plastic Packaging Subject Lead	Environmental Planner 4	Implement a process for reviewing requests for PCRC rate adjustments and temporary exclusions; implement enforcement actions	\$95,654	0.50
IT App Developer	IT App Development - Journey	Maintain the annual reporting online platform and database	\$107,149	0.05
Technical Assistance/Compliance	Environmental Specialist 3	Provide technical assistance and compliance support for PCRC requirements and reporting; post required annual reporting data to the website	\$91,068	1.00
Agency Administrative Overhead	See notes on costs in the table below			0.23
Total FTEs				1.78

Table 5: Estimated PCRC oversight costs by cost category

Cost Object	Description	Estimated Cost
Salaries	Salaries are based on the estimated staff time and the current biennium actual salary rates for the listed positions, at step L.	\$144,252
Benefits	Benefits are the agency average of 34.1% of salaries.	\$49,190
Goods and Services	Goods and Services are the agency average of \$6,048 per direct program FTE.	\$9,374
Travel	Travel is the agency average of \$2,205 per direct program FTE.	\$3,418
Equipment	Equipment is the agency average of \$1,286 per direct program FTE.	\$1,993
Annual Data Purchase	To review requests for PCRC rate adjustments and temporary exclusions, Ecology will need to purchase data on market availability of recycled plastic resin from an independent third-party organization. Estimated annual cost for data on recycled plastic resin availability is \$30,000.	\$30,000
Assistant Attorney General	This estimate is for the workload in the Office of the Attorney General for Assistant Attorney General (AAG) legal counsel regarding criteria and procedures for PCRC rate adjustments and temporary exclusions, and enforcement of the PCRC requirements.	\$46,980
Agency Administrative Overhead	Agency Administrative Overhead is calculated at the federally approved agency indirect rate of 29.8% of direct program salaries and benefits. Agency Administrative Overhead FTEs are included at 0.15 FTE per direct program FTE.	\$57,646
Total Costs		\$342,853

Estimated costs by product category

The estimated costs for each covered product category are calculated using the latest available registration data submitted by producers in the calendar year 2023. Actual costs will be based on registration and reporting data submitted by producers by April 1, 2024.

Table 6: Estimated costs by product category

Please note: the costs in the table below are estimates, based on the best data currently available. The final producer fees for FY 2025 costs will be calculated using data submitted by producers for the registration and reporting period that closes on April 1, 2024.

Product Categories and Resin Weights Reported in Calendar Year 2023 Registration ¹			Estimated Program Administration Costs by Product Category		Estimated PCRC Oversight Costs by Product Category		Total Estimated Costs by Product Category
Product Category (PCRC Content Compliance Date)	Total Plastic Resin Weight (in Lbs.)	Plastic Resin Weights subject to PCRC Content Requirements ²	All Covered Categories % Total Plastic Resin Weight	Category Share of Program Administration Costs	PCRC Product Categories % Total Plastic Resin Weight	Category Share of PCRC Oversight Costs	
Trash Bags (Jan 1, 2023)	57,491,037	57,491,037	28%	\$62,873	31%	\$105,631	\$168,504
Beverage Containers (Jan 1, 2023)	107,374,786	107,374,786	52%	\$117,427	58%	\$197,284	\$314,711
Household and Personal Care (Jan 1, 2025)	21,737,056	21,737,056	11%	\$23,772	12%	\$39,938	\$63,710
Delayed Beverage Containers (Jan 1, 2028)	18,452,187	-	9%	\$20,180	0%	\$0	\$20,180
Total	205,055,066	186,602,880	100%	\$224,252	100%	\$342,853	\$567,105

¹The weights listed are based on data submitted by producers for the CY 2023 registration period. Final individual producer fees will be calculated using registration data submitted by April 1, 2024, for the CY 2024 registration period. During registration, producers will submit plastic resin weights sold or brought into Washington State in the calendar year 2023. This table provides cost estimates, based on the data currently available.

Plastic Producer Annual Fees

The fee calculation

The law requires producers to pay a fee to cover the costs estimated in the pages above. Ecology has adopted a rule (Chapter 173-975 Washington Administrative Code), which specifies the calculations used to equitably distribute fees.

FY 2025 producer fees are calculated based on the producer's reported total pounds of covered product plastic resin data submitted during the annual registration or reporting with Ecology by April 1, 2024. The formulas for the calculations are provided in the rule and in its [Guidance Document](#).

The values for the Program Administration Cost and the PCRC Oversight Cost will be the total estimates summarized above in the workload analysis.

Fee “rate” per total pound of plastic resin

Based on the current estimated costs for FY 2025, and the total calendar year 2022 plastic resin weight submitted during the calendar year 2023 registration, the following are the estimated fee “rates” per total pound of plastic in covered products. These rates are provided so producers can estimate their FY 2025 fees, based on their knowledge of their covered products’ total plastic resin weights.

As noted above, actual FY 2025 fees will be based on the calendar year 2023 plastic resin weight data submitted by April 1, 2024. The total estimated cost will not change, but the weights of plastic resin may change. Fees will be calculated promptly after registration closes at the end of April 1, 2024, and invoices will be sent to producers by mid-May 2024, with fee payments due by mid-June 2024.

Estimated Program Administration Cost per total pound of plastic resin: \$0.0011/lb.

Estimated PCRC Oversight Cost per total pound of plastic resin: \$0.0018/lb.

More information

Public Comments on this document are open until March 3, 2024. To provide comments, visit our [comments webpage](#).

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