



# Washington EPR (Recycling Reform Act)

## Producer Snapshot & Compliance Checklist

As of July 2026.

*This summary is provided for information only and is not compliance or legal advice. Please confirm applicability to your specific products and packaging with counsel and regulators.*

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### Program Overview

Washington's Recycling Reform Act establishes a packaging, paper products, and foodservice ware EPR program. Full program operation expected in 2029 following Ecology rulemaking and program plan approval.

|                                |                                                                                                          |
|--------------------------------|----------------------------------------------------------------------------------------------------------|
| <b>PRO</b>                     | Circular Action Alliance (CAA) appointed                                                                 |
| <b>Scope</b>                   | Packaging, paper products, and foodservice ware. Consumer and limited IC&I sectors                       |
| <b>Agency</b>                  | Washington Department of Ecology                                                                         |
| <b>Funding Model</b>           | Majority (and increasing). Includes disposal and contamination management costs                          |
| <b>Current Producer Status</b> | Pre-program. Simplified Voluntary Supply Reporting was due May 31, 2026                                  |
| <b>Program Fees</b>            | Not active. Early fees expected before full program plan approval                                        |
| <b>Needs Assessment</b>        | Preliminary due Dec. 2026. Full needs assessment due Dec. 2027                                           |
| <b>Rulemaking</b>              | Final rule adoption expected June 2028. Statute requires Ecology to seek harmonization with other states |
| <b>Program Plan Due</b>        | October 2028                                                                                             |

### Where Things Stand (Regulatory Status)

- **Producer Portal:** Opened Nov. 4, 2025.
- **Needs Assessment:** Preliminary due Dec. 2026. Full needs assessment due Dec. 2027.
- **Rulemaking:** Not yet formally started. Final rule adoption expected June 2028. Statute requires Ecology to seek harmonization with other states.
- **Early Fees:** Washington requires collection of early fees to fund initial program implementation until the program plan is approved and annual fees can be collected from registered producers.

### 2026 Key Operational Milestones

| Date                           | Milestone                                | Producer Action                                                         |
|--------------------------------|------------------------------------------|-------------------------------------------------------------------------|
| <b>April 23, 2026 (target)</b> | Simplified Supply Reporting Portal opens | Prepare CY2025 Washington packaging supply data at material class level |

| Date                        | Milestone                                | Producer Action                                                  |
|-----------------------------|------------------------------------------|------------------------------------------------------------------|
| <b>May 31, 2026</b>         | Voluntary Simplified Supply Report DUE   | File via CAA Producer Portal. Data supports CAA program planning |
| <b>July 1, 2026</b>         | Statutory producer registration deadline | Register with CAA or another PRO by this date                    |
| <b>December 2026</b>        | Preliminary needs assessment DUE         | Review findings for program design implications                  |
| <b>December 2027</b>        | Full needs assessment DUE                | Review final findings                                            |
| <b>June 2028 (expected)</b> | Final rules adopted                      | Review rule package; adjust compliance operations                |
| <b>October 2028</b>         | CAA Program Plan DUE to Ecology          | Plan approval triggers fee schedule and producer obligations     |

## Key Watchouts for Personal Care Producers

| Watchout                                       |                                                                                                                                                                                                   |
|------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Not yet a fee-bearing program</b>           | No producer fees are active in 2026. However, Washington law requires early fees before the program plan is approved, so fee collection may begin ahead of the 2028 plan approval.                |
| <b>Simplified reporting this cycle</b>         | Material class level reporting (rather than granular category-level) reduces the data burden for this year. Take advantage of the simpler reporting window.                                       |
| <b>Covered material categories not yet set</b> | Ecology has not yet started rulemaking on covered materials. Category definitions will follow rulemaking and may evolve before the full program launches.                                         |
| <b>Harmonization is statutory</b>              | Ecology must seek to harmonize packaging EPR rules with other states. This is favorable for multi-state producers but does not guarantee identical categories to Oregon, Colorado, or California. |
| <b>Long runway before full program</b>         | Program plan is due October 2028 and full program is expected in 2029.                                                                                                                            |

## Resources

- [Ecology rulemaking page \(WAC 173-950\)](#)
- [Ecology producer responsibility organization page](#)
- [SB 5284 bill page](#)
- [SB 5284 session law](#)
- [CAA Washington producer page](#)

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