

Memorandum

DATE: February 9, 2021

TO: Debbie Tarry, City Manager

FROM: Autumn Salamack, Environmental Services Coordinator

RE: Recology and Basel Convention Plastic Waste Amendments Update

CC: John Norris, Assistant City Manager; Colleen Kelly, Director, RCCS; Bethany Wolbrecht-Dunn, Community Services Manager

This memo provides additional information regarding Recology's January 19, 2021 communication regarding the Basel Convention Plastic Waste Amendments Update. Recology recently made changes to how plastics #3-7 are disposed of in all the communities they serve. These are lower grade, less common plastics that represent less than 1% of all materials collected by Recology King County. We currently accept plastics #3, 5 and 7 in curbside carts in Shoreline and plastic #6 (Styrofoam) for special item recycling. Some plastic #4 (plastic bags/film) was removed from our accepted list with the 2019 contract amendment.

In the past, Recology would bale plastics #3-7 from curbside carts all together and send them overseas to be sorted for individual recycling. Given that these materials are no longer being sent overseas, Recology is working to find domestic markets for these low grade, small quantity plastics. Per the table below, they currently have domestic markets identified for recycling some but not all of these plastics. It is unclear when markets will be available for domestically recycling all the impacted plastics. In the meantime, those materials are being disposed of as residual waste. A series of clarifying questions were answered by Recology staff in recent weeks, as noted below.

Will the list of materials accepted in blue recycling containers change?

No. Recology is not asking to make any changes to the list of accepted items for recycling. They anticipate domestic markets will be established for these materials at some point in the future as result of global policy change.

What specific items are listed as accepted for commingled recycling in Shoreline that are referenced as problem materials with the Plastic Waste Amendment?

Our contract identifies two types of plastic materials accepted for recycling: Plastic Containers (bottles, cups, jugs, tubs, lids >3", food containers and trays, plant pots and similar) and Rigid Plastics (5g buckets, PVC pipes, laundry baskets, plastic lawn furniture, Big Wheels, coolers, Nalgene Bottles, PVC pipe < 4 ft long). Recology refined that list of materials to show direct applicability with the Basel Amendment as noted in the table below. Examples of the most common impacted materials include certain types of food containers, PVC pipe, plastic film, and polystyrene.

Contract Accepted Plastics	Resin Code	Covered by Basel Amendment	Domestic Market Currently Available?
Plastic Containers			
Bottles	#1		Yes
Cups	#1		Yes
Jugs	#2; #4; #5; #7		Yes
Tubs	#2; #3; #5	X	Yes - except #3 at this time
Lids > 3"	#2; #3; #5	X	Yes - except #3 at this time
Food containers & trays	#3; #5; #6	X	Yes - except #3 and #6 at this time
Plant pots	#2; #5	X	Yes
Rigid Plastics			
5g buckets	#2	X	Yes
PVC pipe < 4ft	#3	X	Prohibitive - Problematic for domestic market
Laundry Baskets	#2	X	Yes
Plastic Lawn Furniture	#2	X	Yes
Big Wheels	#2	X	Yes
Coolers	Not specified	X	Prohibitive - Problematic for domestic customers because of insulation
Nalgene Bottles	Not specified	X	Yes
Plastic Bags & Film			
Clean, dry shopping, newspaper, and dry cleaning bags	#4	X	Previously removed from Shoreline's accepted material list

Can these materials be stored until recycling markets are identified?

Recology doesn't have space to provide long-term storage for impacted plastics until a recycling market might be identified, which could be a few months or a few years. While they could rent shipping containers to provide storage for materials, that would quickly become prohibitively expensive.

When did Recology make the decision to move forward with the actions outlined in the memo?

Recology decided to stop exporting #3-7 plastics in late December. The Basel Amendment was approved by member nations in 2019, however, the impact to US recycled plastic exporters was unclear at the outset and has continued to evolve. Additionally, it became clear that the new Biden administration would also be honoring if not signing the Basel agreement.

Are other waste haulers taking similar steps with respect to these plastics?

City staff reached out to staff in surrounding municipalities and the County, none of whom have received a notice about this challenge from any haulers other than Recology. It's unclear why we aren't hearing about similar conversations taking place with other waste haulers. However, it could be that they had already stopped collecting the impacted materials from their customers or were already treating those materials as residual waste. Recology reported that they consulted with King County and the Department of Ecology on the matter and felt that both agencies viewed their approach as reasonable. Neither agency has adopted an official position on this issue.

Are there any steps to be taken with respect to our contract?

Per Section 3.1.12 of our contract, Requirement to Recycle and Compost, Maintaining Quality Assurance Through Monitoring, “the Contractor shall recycle all Source-separated Recyclables collected and compost all Source-separated Compostables collected, unless express prior written permission is provided by the City.” As defined in our contract, “the term “Source-separated” means certain reclaimable materials that are separated from Garbage by the Customer for recycling or reuse, including but not limited to Recyclables, Yard Debris, Food Scraps, and other materials.”

From Recology: This is a unique situation in that global policy changes have impacted contract materials and are not currently “reclaimable” or “recyclable” due to limited domestic end-markets in the US. Unlike past periods of market volatility, the material could still be recycled at a lower price point or in some cases at substantial cost. Currently, there do not appear to be domestic end-markets, at any price point, for mixed bales of #3-7 plastics.

Next Steps

Given the unique and fluid nature of this issue, the very small quantity of impacted materials and the determination that they are not currently “reclaimable” or “recyclable” due to limited domestic end-markets in the US, staff thinks these actions are in line with the contract. We will continue to closely monitor this issue, and to ascertain if/when any materials should be removed from the list of accepted items for recycling, during our monthly team meetings with Recology staff.