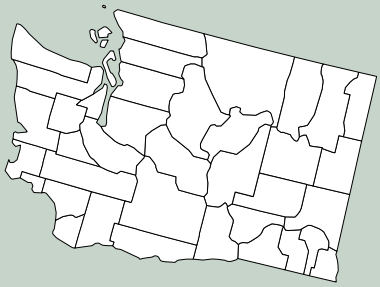
Washington

EPR Snapshot for Envelope & Mail Producers



Summary

PRO: Circular Action Alliance (CAA)

Status: Enacted, Rulemaking in Progress

Upcoming rulemaking: The Department of Ecology will publish a statewide, standardized collection list by October 2026. A preliminary needs assessment of existing recycling infrastructure is scheduled for publication in January 2027.

Washington is the newest state to enact a packaging and paper EPR law. The Recycling Reform Act covers residential packaging and paper products. Rulemaking and implementation began in 2026. Full statewide rollout is expected by 2030. Given the early stage of implementation, EMA members should begin tracking closely and prepare for registration.

What Is Covered

- Residential packaging materials
- Paper products — Washington's inclusion of paper products extends scope beyond packaging alone

Washington's 'residential' qualifier is an important detail — it suggests the primary target is consumer-facing packaging rather than B2B paper products. However, envelopes and direct mail that reach residential consumers may fall within scope. Rulemaking will clarify.

Practical Takeaways

- Monitor Washington Ecology rulemaking for coverage definitions affecting paper products
- The residential qualifier may work in favor of B2B envelope operations — but confirm with counsel before assuming exemption
- Engage with CAA and AF&PA for Washington-specific updates as they become available

What to Watch

- Washington Ecology rulemaking — coverage definitions and producer thresholds are being established now
- PRO designation — registration requirements will follow once finalized

- Whether 'residential packaging' scope applies to direct mail and transactional envelopes delivered to homes

Key Dates

- 2026 - Washington Department of Ecology began rulemaking
- July 1, 2026 - The formal deadline for obligated producers to register and enroll with CAA
- January 2027 - Preliminary Recycling Infrastructure Needs Assessment published for public review
- October 2027 - Ecology issues the formal, comprehensive EPR proposed regulations
- 2030 - Expected full statewide program rollout

Key Resources

- Washington Ecology EPR Page
- CAA Producer Resource Center
- Product Stewardship Institute — EPR Laws Map

Practical briefing only; not legal advice. Consult qualified counsel to determine how EPR obligations apply to your specific products and operations. Last updated October 2026.

