



December 17, 2025

Recycling Reform Act Team
Washington State Department of Ecology
300 Desmond Dr SE.
Lacey, WA 98503
recyclingreform@ecy.wa.gov

Dear The Recycling Reform Act Team:

Further to our letter of intent sent to the Washington Recycled Content Team on May 23, 2025, [LPMA powered by Interchange 360](#) (LPMA) is following up in advance of January 1, 2026, on behalf of our producers to confirm LPMA's intention to develop a program plan in Washington to comply with [The Recycling Reform Act, S.B. 5284](#)

LPMA was founded in June 2024 in response to EPR laws by BP Lubricants USA, Inc. (Castrol), Chevron U.S.A. Inc., ExxonMobil Oil Corporation, Pennzoil Quaker State d/b/a SOPUS Products (Shell) and VGP Holdings LLC (Valvoline Global). We serve the petroleum and automotive sector by providing members with support in complying with state EPR laws and by returning material to its members and suppliers for the creation of new products.

Everywhere there is a successful EPR program for packaging; there is a separate collection and material management system for petroleum and automotive packaging. In British Columbia, Canada, for example, the Interchange program operates an independent collection system from the common system. The B.C. program has approximately 7,000 collection points, including 300 public return collection facilities (e.g., local government and private depots retailers, and service stations) through which it collects approximately 95% of the targeted containers sold in B.C.

LPMA plans to be active in every state that implements a packaging or household hazardous waste EPR law for its [applicable products](#). To date, LPMA has received program plan approval in Colorado and is developing programs in other states.

Producers looking to comply with the upcoming RRA producer appointment deadline will be seeking direction from the State on how they can comply. To assist producers in understanding their compliance options, can you please provide your acknowledgement of LPMA's intention to develop a state approved plan and be a compliance option for producers of petroleum and petroleum related packaging. Specifically, by joining LPMA producers would be compliant with the requirement to appoint a producer responsibility organization by Jan 1, 2026. It is important that LPMA is recognized at the same time as the producer responsibility organization, so producers have clarity on how to comply.

Please contact LPMA CEO David Lawes at dlawes@interchange360.com or (778) 977-1280 to arrange a meeting.

Sincerely,

A handwritten signature in black ink, appearing to read 'DL', with a long horizontal stroke extending to the right.

David Lawes, CEO