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Source separation must remain the cornerstone of contamination reduction in organics management.

According to RCW 70A.205.005(5):

'Source separation of waste must become a fundamental strategy of solid waste management. Collection and handling strategies should have, as an ultimate goal, the source separation of all materials with resource value or environmental hazard."

Rulemaking should prioritize reinforcing this principle. Receiving facilities must retain the authority to reject contaminated feedstocks. While new businesses and technologies aim to address contamination, the most cost-effective and impactful solution remains source separation. Rulemaking should support and strengthen existing source separation requirements and schemes.

Depackaging technology introduces new challenges.
When heavily packaged food waste is allowed into composting facilities, it increases the risk of contamination due to generator confusion. Confusion is a challenge for source separation currently and any rulemaking should strive to minimize additional confusion. If packaging-contaminated organics are allowed, they must be treated as a separate waste stream and never commingled with source-separated organics.

Contamination thresholds must be based on robust data.
Current contamination limits—both for incoming material and finished compost—are widely understood and effective. Any proposed changes must be supported by independent data and thorough analysis. Raising contamination thresholds is unjustified, and lowering them without careful study may cause unintended consequences, including disruptions to diversion programs and compost markets.

Consistency across organics management facilities is essential.

Any adjustments to contamination limits must apply equally to all facilities handling organic materials. Allowing higher contamination levels at certain facilities risks undermining the highest and best use of diverted organics, in direct conflict with legislative intent.
RCW 70A.205.005(8) establishes a clear hierarchy for solid waste management:

(a) Waste reduction
(b) Recycling, with source separation of recyclable materials as the preferred method
(c) Energy recovery, incineration, or landfill of separated waste
(d) Energy recovery, incineration, or landfill of mixed municipal solid wastes

Composting is a higher use of organics than energy recovery.
Rulemaking must not incentivize energy generation at the expense of composting. Doing so would contravene both the principles of organics recycling and the clear intent of Washington's waste management laws.