

# Tristan Daedalus

Please see attached file.



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March 31, 2025

**ORGANIC MATERIALS MANAGEMENT RULEMAKING**  
**DEPARTMENT OF ECOLOGY AO# 24-12**

ATTN: Chris Fredley  
Department of Ecology, Solid Waste Management Program  
PO Box 47600  
Olympia, WA 98504-7600

*Via electronic submission*

**RE: Informal Comments**

In response to the Washington Department of Ecology's December 12, 2024, Statement of Inquiry, Baker Commodities respectfully submits the comments below for the Department's consideration in preparing amendments to its organic materials management regulations.

As one of the last two remaining renderers in Washington State, Baker Commodities is committed to helping the state achieve its policy goal of reducing climate pollution by 95% by 2050<sup>1</sup>. Especially with this objective, the importance of including agricultural rendering in an all-of-the-above organic waste management strategy cannot be overstated.

Rendering transforms inedible animal byproducts and used cooking oils into valuable materials and serves as an extraordinarily powerful tool to meet reduction targets for short-term climate pollutants (STCP). This will be critical to reducing the roughly 8% of greenhouse gasses from agriculture and around 4% from wastes (including organic wastes).

But it should be noted that the rendering process doesn't just trap and contain these pollutants; the nature of the chemical reactions that take place in the high-pressure, high-temperature rendering process mean that elements (like carbon, hydrogen, oxygen, and nitrogen) that would typically be released into the atmosphere as greenhouse gasses (i.e. methane (CH<sub>4</sub>), carbon dioxide (CO<sub>2</sub>) nitrous oxide (N<sub>2</sub>O)) instead become part of entirely different chemical compounds in the high-value finished products that rendering produces. Additionally, these high-quality finished products often eliminate the need to harvest/refine new virgin materials, which are usually produced through additional carbon-intensive processes.

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<sup>1</sup> <https://app.leg.wa.gov/rcw/default.aspx?cite=70A.45.020>



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These finished products become economic inputs that stimulate and support a variety of sectors, becoming both feedstocks and finished products and are found in a host of high-demand commercial goods, including animal and pet food, fertilizers, cooking oils, soap, cosmetics, detergents, industrial lubricants, greases, and advanced biofuels.

These numbers are not just hypothetical; they are discretely quantifiable and the subject of extensive academic research. As just one example, a 2016 review in Applied Animal Science found two critical points. First, *“Fuel consumption and other rendering plant operations emit about 25% as much carbon dioxide as complete aerobic decomposition of the meat by-products would release,”*<sup>2</sup> and second, *“If an equal quantity of meat by-products is processed by rendering, composting, and anaerobic digestion, the economic value of the rendered products is at least 3 times the value of the products resulting from anaerobic digestion and at least 5 times the value added to compost by inclusion of the meat by-products.”*<sup>3</sup>

Put another way, the rendering process sequesters five times more carbon than it emits while creating goods that are at least three times as valuable as the closest competing process.

But even with these advantages, it is well known that rendering’s biggest competition isn’t an alternate recycling pathway (like composting or anaerobic digestion as mentioned above) but the local landfill. Just as in other sectors, cost-per-ton disposal rates to landfill waste are almost always dramatically lower than applicable recycling pathways. In the recycling equation, renderers work in concert with composters and digesters to manage various types of organic waste for the maximal environmental and social benefit. But just like rendering lettuce would not produce a high-quality finished product, composting bovine offal into a biosolid would be of far lower social value than the myriad products and inputs produced from rendering those same scraps, including products that feed animals and meet energy and industrial needs.

With this in mind, it is important to understand that a lack of rendering capacity, both in Washington state and nationally, will result in demonstrably worse outcomes for producers (through limited disposal options), for consumers (through higher costs), and for the environment (through greater levels of GHG emissions).

Insofar as the Department seeks to address challenges in the organic waste disposal marketplace with regulation, incentives, or requirements, Baker Commodities encourages a technology-neutral

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<sup>2</sup> [https://www.appliedanimalscience.org/article/S1080-7446\(16\)30007-9/fulltext](https://www.appliedanimalscience.org/article/S1080-7446(16)30007-9/fulltext)

<sup>3</sup> Ibid.



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regulatory approach that encourages, incentivizes, and if necessary subsidizes, organic waste generators to avail themselves of the recovery pathway that recycles their organic waste product to its highest-and-best use.

Regarding the Department's specific questions on the disposal of slaughter waste generally, Baker Commodities suggests that, to the maximum extent practicable, the Department promote, encourage, and otherwise incentivize the diversion of these products to existing rendering facilities across the state. Not only would this ensure these products are recycled to their highest-and-best use, but it will also ensure the destruction of any potential pathogens developing in these wastes and the minimization of any collateral risks to the remaining herd animals intended for human or animal consumption.

Baker Commodities strongly desires to serve Washington's meat processors and agricultural producers and stands ready to work with the Department to address any impediments to the availability of independent rendering services across the state.

## **About Baker Commodities**

Baker Commodities is a three-generation family-owned and operated recycling business, trusted as one of the nation's leading providers of rendering and grease management services since 1937. We take our commitment to the environment seriously and provide critical services to support farmers and dairymen, minimize the environmental impact of the agricultural and food production supply chains, and assist restaurants and municipalities alike by transforming destructive waste into high-quality finished products.

We are proud of our work to contribute to the circular economy. Every day, our facilities across the country convert food-grade meat products considered inedible to American consumers, as well as other by-products from meat processing, into valuable commercial commodities, including high-protein animal and pet food ingredients, and tallow, a critical base component for soaps, paints, cosmetics, lubricants, and more. Our facilities also convert used cooking oil into a key feedstock for the advanced biofuels that are serving as drop-in replacements for traditional petroleum-based products and helping to reduce carbon emissions across the transportation sector.

Baker is dedicated to saving the environment by ensuring we use sustainable methods to support the industries we serve. Not only do our finished products address important social needs using materials that would otherwise be wasted, but they often serve as a replacement for traditional, petroleum-based inputs. We're also proud to report that the rendering process produces these benefits while sequestering a whopping five times more carbon than it emits.



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## Conclusion

Together with our partners in the rendering industry and the team at the North American Renderers Association (NARA), Baker Commodities stands ready to assist the Department with its important work in ensuring that organic waste and on-farm slaughter scraps are used for their most productive and valuable purpose while providing for our environmental and resource conservation goals.

Respectfully submitted,

Tristan Daedalus

Legislative and Regulatory Affairs Manager

Baker Commodities