



### **Source Separation: The First Step Toward Recycling, Composting, and All Diversion**

- Washington's waste and recycling laws recognize that all diversion of waste from landfills begins with one fundamental concept: source separation.
- What is Source Separation? "Source separation" simply means the separation of different kinds of solid waste at the location where the waste originates. RCW 70A.205.015(26). When you put all of your recyclables in one bin and all of your organics in another, that's source separation!
- Source separation is the key first step in separating materials for recovery (like recycling and compost/organics) from materials for disposal (garbage or waste container).
- Recycling and organics diversion both begin with source separation for good reasons, and Washington's laws reflect this essential first step toward diverting waste from landfills.

### **The Importance of Source Separation**

- **The First Step:** Source separation plays a key role in recycling and organics diversion efforts by separating material for recovery from material for disposal. This helps recover valuable resources which reduces overall environmental impact. Washington's waste industry is 4.1x Net Zero on greenhouse gas emissions due to all of the recycling and composting we accomplish.
- **End Products & Markets:** Source separation ensures that materials are kept clean and uncontaminated. The end markets for both recyclable commodities and compost have specific requirements for the quality and purity of materials they accept.
- **Contamination Prevention:** Contamination reduces the quality and value of both recyclables and organics for compost, making them more difficult and costly to process. Clean, separated materials can be processed more efficiently, leading to lower processing costs, reduced energy consumption, and fewer greenhouse emissions.
- **Public Health, Odor and Pest Control:** Source separation of organic waste also helps control odors and eliminate pests from organic waste. Source separation reduces the likelihood of these issues arising, making composting more manageable in residential and commercial settings, particularly in urban areas. Companies that collect and transport mixed, non-source separated wastes are highly regulated with high safety, consumer protection, and solid waste handling standards.
- **Better Environmental Outcomes:** Source separation contributes to the conservation of natural resources. Recycling and recovering materials such as paper, plastic, glass, and metal diminishes the need for v raw materials, which helps to preserve forests, conserve energy, and reduce greenhouse gas emissions. Compost produced from organics waste can be used in place of other dirt or fertilizer with higher environmental footprints.
- **Education and Awareness:** Source separation promotes education and awareness about composting and recycling. By encouraging individuals and communities to separate organic waste for composting, it fosters a culture of environmental stewardship and sustainable waste management practices.

### Source Separation in Washington Law

- The Washington legislature finds that “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.” RCW 70A.205.005(4). To protect public health and safety, the collection and transportation of solid waste is a highly regulated industry in Washington.
- To protect public health and safety, the collection and transportation of solid waste is a highly regulated industry in Washington. Collection and transportation of mixed solid wastes that are not source separated are generally regulated as solid waste under RCW 81.77 and may only be collected and transported pursuant to a Certificate of Public Convenience and Necessity issued by the Washington Utilities & Transportation Commission, under contract with a city, or by a city itself within the city limits. Transporting solid waste for disposal without authority on “more than an occasional basis” violates Washington law, WAC 480-70-016.
- More specifically, Collection of mixed solid wastes (garbage bin) from residential and commercial customers requires authority to collect and transport under Washington law, as discussed above. Collection of source separated re source separated recyclables (recycling / organics) from residential sources also requires authority. Source separated recyclable materials from commercial sources are considered solid waste by Ecology, but their transportation is not regulated by the UTC. Transporters of recyclable materials must register with the Ecology and must obtain a common carrier permit from the UTC.
- Washington’s laws reflect the importance of source separation at both the state, local, and individual level:
  - Local government plans must include strategies for the “Source separation of recyclable materials and products, organic materials, and wastes by generators” and the “collection of source separated materials” RCW 70A.205.040(1)
  - “It is the responsibility of state government to ensure that local governments are providing adequate source reduction and separation opportunities and incentives to all.” 70A.205.005(6)(d)
  - “It should be the goal of every person and business to minimize their production of wastes and to separate recyclable... materials from mixed waste.” 70A.205.005 (6)(a)
  - Many businesses in Washington must arrange for organic materials collection, as required by the [2022 Organics Management Law](#) expanding organics service in the state. The law expressly requires businesses subject to this law to source-separate their organic material from other waste. 70A.205.545.
  - Courts have viewed source separation as a key legal concept for distinguishing unregulated hauling of commercial recyclables from regulated transportation of mixed solid wastes. *AGG Enters. v. Washington County*, 281 F.3d 1324, 1328 (9th Cir. 2002)).
- Many Washington cities contract with third parties for solid waste collection services. Contracts regularly require solid waste generators to source separate their waste streams to a high standard to maximize recovery while minimizing cross-contamination and residual waste down the line. In some jurisdictions, waste collectors “tag” contaminated containers with an explanation of what must be removed before the container can be emptied by the collector.
- For recyclables, contamination reduces the end value of commodities. For organics, contaminants can remain in compost. Contaminants like plastics, glass, and metals are not biodegradable and can take a long time to break down, if indeed they indeed break down at all.
- Recycling and Composting facilities both need to manage inbound contamination, which is accomplished through source separation:

- Permitted compost facilities must have procedures and criteria to ensure that facilities accept only source separated feedstocks. State regulations include a default limit of 5% inbound contamination and compost facilities across the state therefore are typically held to this 5% contamination standard. WAC 173-350-220(f)(iii)(C). Facility acceptance lists include only items that can actually be processed and do not knowingly accept materials that will be landfilled. Because of our standards, Washington achieves impressive recovery rates at compost facilities with some recycling over 95% of all inbound materials. There are no current state standards for facilities that prepare materials for anerobic digestion, but these facilities will be subject to future rulemaking (such as de-packaging facilities that accept large volumes of non-source separated municipal solid waste).
- Permit Exempt recycling facilities can only accept wastes source separated into individual material streams, and have a 5% annual capacity limit on the amount of residual waste sent for disposal. WAC 173-350-210(2).

*In summary, source separation is extremely important to protect local solid waste programs. It is crucial for recycling and composting under Washington State laws because it supports waste reduction goals, maintains quality standards for recyclables and compost, protects the environment, and fosters community engagement and education in diversion. By emphasizing and encouraging source separation in its laws and regulatory policies, Washington State can effectively manage its waste streams, conserve resources, and promote environmentally and economically sustainable waste management practices.*