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July 17, 2025

Department of Ecology
Solid Waste Program
P.O. Box 47600
Olympia, WA 98504-7600
Email: ecyadacoordinator@ecy.wa.gov

Re: Comments on Draft Rule Concepts – Pre-processing Operations and the Need for Recyclable Material Protections

Dear Department of Ecology:

On behalf of SeaDruNar Recycling, a Seattle-area recycling company that collects, processes, and markets recyclable materials, we appreciate the opportunity to comment on the draft rule concepts regarding pre-processing operations under the current organics rulemaking.

We are writing to express serious concerns about the lack of proposed standards to prevent recyclable materials from being accepted by pre-processing facilities and ultimately disposed of in landfills. We have recently become aware of this new business model operating in the organics space at local Safeway and Fred Meyer stores. We see serious problems and impacts to recyclers like SeaDruNar if not addressed by Ecology in the rulemaking. This issue, allowing recyclables to be put in organics containers and landfilled, will harm Washington's recycling infrastructure and goes against the state's longstanding waste diversion and recycling goals.

Our company operates a permitted Materials Recovery Facility (MRF) in Seattle and works in partnership with local governments, businesses, and residents to ensure that recyclables are collected, properly sorted, and returned to productive use in the circular economy.

Based on market reports and available information about this new organics model, the following recyclable materials that have commodity value are being landfilled:

- To-go, PET plastic containers for deli items
- Vegetable and fruit PET clamshells
- Ice cream cartons
- Cardboard packaging
- Egg cartons
- Paperboard for cereal, granola bars etc.
- Certain plastic films

- Paper bags
- Paper cups, cartons, juice boxes, milk cartons
- Lids
- Dairy tubs, plastic cups

Put simply, I think we can agree that landfilling of these items should not be allowed by Ecology currently nor under any new rules.

Acceptance of these materials in the organics stream where they are ultimately landfilled is a *significant* and *growing* problem. These products are designed to be easily opened by the consumer and my customers have been sorting them for years. The current regulatory landscape appears to allow pre-processing operations to sidestep accountability and operate without performance standards for contamination, diversion, or recovery. This creates a loophole through which recyclable tons are quietly disposed of, out of sight and without measurement, while undermining legitimate recycling operations that must meet stringent quality and reporting requirements.

The combination of organic and inorganic materials in the waste stream cannot currently be separated by existing mechanical or manual sort systems and would contaminate the existing waste streams and create conditions to increase the amount of recycled products going to landfills.

We are already seeing a reduction in recyclable tons received at our facility as a direct result of this shift. Additionally, while we currently focus on fiber and container recycling, some of our partners are involved in organic and compostable products who would also lose a valuable source of materials by blending the non-organic packaging with the organics in the name of convenience. If the state proceeds with codifying these allowances into rule-without safeguards or minimum recovery standards-the losses could become severe and systemic. We anticipate significant reductions in recycling tonnage across the state if the acceptance of mixed organics and recyclables by pre-processors becomes a normalized and unregulated practice.

To align with the state's waste diversion hierarchy and environmental commitments, we urge Ecology to adopt clear and enforceable requirements for pre-processing operations, including:

- A prohibition on the acceptance of designated recyclable materials at pre-processing facilities.
- Mandatory separation of recyclables from the organic stream prior to processing.
- Performance-based diversion standards and third-party verification of recovered vs. landfilled material.
- Transparent reporting of inbound material composition and outbound destinations for all residuals.

Washington has been a national leader in waste reduction and recycling. We urge Ecology not to compromise that leadership by allowing a system that facilitates the quiet burial of recyclable materials under the cover of organics recovery.

We appreciate your attention to this matter and look forward to working collaboratively to protect Washington's recycling infrastructure.

Sincerely,

A handwritten signature in black ink, appearing to read "Seth C. Little". The signature is written in a cursive, flowing style.

Seth Little, General Manager
SeaDruNar Recycling
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