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August 1, 2025

Mr. Chris Fredley
Rules Coordinator, Department of Ecology
300 Desmond Drive Southeast
Lacey, WA 98503

RE: Organic Materials Management Rulemaking (2nd Informal Comment Period)
Chapter 173-350 WAC – Solid Waste Handling Standards (Organic Materials
Management Rulemaking)

Dear Mr. Fredley:

Thank you for the opportunity to comment during the 2nd Informal Comment Period on the above reference rule. The US Composting Council represents compost manufacturers nationwide with a membership of more than 850 organizations (45% of whom are public and private compost manufacturers) of more than 2,500 people, and with over 127 members in the State of Washington. Our mission is to advance compost manufacturing, compost utilization, and organics recycling to benefit our members, society, and the environment.

As a supporter of the benefits of source separated organics to ensure quality feedstocks for composting and decreasing the diversion of packaging waste to landfills that could effectively be recycled, the US Composting Council supports meeting the intent of the Washington State's Organics Management laws to divert more materials from landfills and support the State's composting infrastructure. We **oppose any revisions** to Chapter 173-350 Solid Waste Handling during the Organic Materials Management Rulemaking that impose costly and unprecedented standards on compost facilities while offering no parallel regulatory guardrails for preprocessing operations (aka depackaging facilities). This is important to preserve the intent of the law, and to create an equal playing field among businesses working to decrease food scrap disposal in accordance with Washington's law.

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.

The US Composting Council has reviewed reviews and comments from others in alignment with our position such as the Washington Refuse & Recycling Association (WRRRA) and members such as Cedar Grove Composting; and has reviewed comments by these parties. The US Composting Council strongly supports the points made by Cedar Grove and the feedback provided by the WRRRA. All of these arguments are also firmly grounded in Washington State's recently passed laws on the management of organics in the solid waste stream, and need to be strongly considered as the Ecology Department proceeds with the Rulemaking process. We have seen the negative impact on the composting and recycling industries in states such as Maine and Vermont when non-source separated organics collection invited generators (groceries, food distributors, and other large generators) to toss ALL (including previously source separated and composted organics) inedible food waste, packaging and other components of the solid waste stream into dumpsters headed for depackaging. This has forced a lengthy process in the State of Vermont to reaffirm the intent of its source-separated organics law, yet many composters never recovered, leaving a deficit of compost for healthy soils in the State.

We are very concerned that the "green" State of Washington could face similar impacts on its robust and developed compost industry, and healthy soil policies needing quality compost.

Please work with the State of Washington's composting and recycling industries to ensure that appropriate levels of inbound contamination are fairly set for all industries involved with food scrap recycling; while maintaining the intent to source separate organics for composting and divert packaging from landfills.

The US Composting Council thanks you for the opportunity to provide our comments during the Organic Materials Management Rulemaking (2nd Informal Comment Period) for Chapter 173-350 WAC – Solid Waste Handling Standards (Organic Materials Management Rulemaking). We look forward to working with the Ecology Department staff throughout the remainder of the rulemaking process.

Sincerely,



Linda Norris Waldt, Executive Director
US Composting Council

cc: Neil Edgar, Co-Chair, USCC LEAC
Sandy Briggs, Co-Chair, USCC LEAC
Jay Blazey, Cedar Grove
Brad R. Lovaas, WRRRA