

December 12, 2025



Director Casey Sixkiller
Washington State Department of Ecology
P.O. Box 47600, Olympia, WA 98504-7600

Re: Comment on Chapter 173-350 WAC - Solid Waste Handling Standards (Organic Materials Management Rulemaking)

Dear Director Sixkiller,

We appreciate the opportunity to provide comment during the informal comment period on *Chapter 173-350 WAC - Solid Waste Handling Standards (Organic Materials Management Rulemaking)*. Zero Waste Washington's mission is to drive policy change for a healthy and waste-free world. We envision a just, equitable, and sustainable future where we all produce, consume, and reuse responsibly.

We appreciate the hard work that Ecology staff has put into the rulemaking process, including the outreach to stakeholders.

We have the following comments:

- Page 6: 173-350-020 (2)(aa). Why would organic material for animal feed include packaging? We recommend this be deleted.
- Page 9: WAC 173-350-025 (2). Commercial waste generators should retain legal responsibility for their waste.
- Page 42: WAC 173-350-100 "Organic materials." We strongly support adding pesticides and herbicides as an explicit and disallowed contamination of organic material.
- Page 43: WAC 173-350-100 "Organic materials pre-processing." We disagree that standards are included in a definition. Also, "source separated material" should be used instead of "feedstocks" so that the logic of the rule flows.
- Page 48: WAC 173-350-100 "Recyclable materials." It is confusing to incorporate "organic" materials within recyclable materials as the term "organic materials" is being used to distinguish from recyclable materials (for example, the example you provide in the source separation definition). OR there should be a clear distinction made.
- Page 53: WAC 173-350-100 "Source separation." We recommend that you remove the grocery store example in this definition as this is blending materials. Also, existing statutory definition of "organic feedstocks" is limited to "source separated organic material."

- Page 59: WAC 173-350-100 "Worm castings" or "vermicast." This definition is circular.
- Page 62: WAC 173-350-215 (2). We strongly support a standard for feedstock of 2% contamination, but recommend that this be based on weight, not volume, in order to be practical. I have heard from several composters in Washington that they can meet a 2% standard. We need clean products in order to ensure that we are not creating macro-, micro- and nano-plastics in our landscaped and agricultural areas. (This comment applies to several sections of the draft rule)
- Page 67: WAC 173-350-215 (6). Pre-processing facilities need to have performance standards, with a recovery rate, to ensure that the state's goal of maximum diversion of organic material is achieved. We also have a concern that material that would otherwise be recyclable will be rendered unrecyclable by certain depackaging equipment or other technologies, thus reducing the load of material that should be recycled. We recommend that the recent approach proposed by the State of Vermont be applied in this Washington rule regarding sufficient handling of heavily packaged versus lightly packaged material.
- Page 105. WAC 173-350-220 (6)(a)(vi)(A). We strongly support the training and continuing annual/biannual training requirements, but recommend that these (or similar) requirements apply to all organic material management facilities, as we understand that there are operational challenges across all facility types. (This comment applies to several sections of the draft rule)

Thank you for consideration of our comments. I can be reached at (206) 441-1790 or heather@zerowastewashington.org.

Sincerely,



Heather Trim
Executive Director