WFIA Washington Food Industry Association

Supporting and representing the neighborhood grocers, convenience and specialty retail stores, suppliers and distributors that make up the fabric of our communities in Washington State.

December 12, 2025

Department of Ecology
organicsrule@ecy.wa.gov

RE: Rule Amendment Changes- Chapter 173-350 WAC – Solid Waste Handling Standards

Thank you for the opportunity to provide feedback on the rulemaking for solid waste handling standards. The Washington Food Industry Association (WFIA) represents independent grocery stores, convenience stores, and their wholesalers and suppliers across the state. WFIA members are community leaders in reducing food waste, with their efforts touted by groups like the Pacific Coast Collaborative. Our stores truly "reduce, rescue and recycle," and find creative ways to eliminate food waste while following state guidelines and regulations for composting.

As representatives of some of the smallest commercial generators in Washington, we share the goal of keeping food waste out of landfills, but we also need to ensure implementation is cost effective for stores and that rules are easy to comply with. Our stores' back of house operations manage both packaged and unpackaged food, and we need options that work for both. Currently, most composters do not accept commercially generated food waste, especially when it is packaged or mixed. We understand this is the problem the Department of Ecology is attempting to address.

Unfortunately, there are misconceptions about current market practices, specifically, that stores already pre-process compostables by depackaging items. This is simply untrue. The vast majority of our members do not have the storage capacity or staff to handle separate packaging. This requirement would significantly increase labor costs, one of the most expensive line items in operating budgets.

We believe the best path forward is to focus on innovative solutions that require minimal responsibility for local commercial generators while allowing for the greatest environmental impact, such as anaerobic digestion. Data demonstrates that when our members use a program that accepts both packaged and unpackaged food, diversion jumps. One study showed that stores utilizing a depackaging program diverted around 200 lbs/store/day, but roughly 250 lbs/store/day still went to trash—including 155 lbs of packaged food. After adding service that accepts both streams, diversion rose to 500+ lbs/store/day.

While WFIA acknowledges the need for less contamination, we do not believe accountability should fall solely on grocery retailers to source separate. We request keeping the updated source-separation definition that mirrors how we already sort food, recycling, and trash. We also support solutions that reduce contamination, increase diversion, and keep costs workable for our industry. We appreciate the opportunity to comment and look forward to continuing to be part of this conversation.

Sincerely,

Molly Pfaffenroth
Government Affairs Director

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