

## WA Retail Association (Rose Gundersen)

The Washington Retail Association appreciates Ecology's work to update WAC 173-350 to reduce contamination in organic waste. Many of our members include food as part of their merchandise and services—such as convenience stores, shopping centers, and large-format retailers.

These retailers are committed to achieving the Legislature's goals to divert organic materials from landfills, reduce food waste, and expand food donation. The updates proposed are vital to supporting these goals by ensuring continued access to diverse and viable organic food-processing options.

Because retailers' core expertise lies in serving customers—not in operating sophisticated food-separation systems—the proposed contamination threshold of less than 2% is not feasible for many without substantial investment in specialized equipment and operational changes.

In practice, some retailers contract with specialized food-separation service providers who haul away excess food from retail premises and process it appropriately. These partnerships have data to demonstrate successes that include improvements in contamination standards, increased diversion and food donation, and assurance that materials entering the organics stream are properly prepared and separated for organic materials processing.

The proposed updates to WAC 173-350 affirm practices that have demonstrated success and help ensure an ecosystem of options—supported by diverse technological approaches such as the anaerobic digestion process the EPA supports—to efficiently achieve the Legislature's goals. We appreciate Ecology's efforts to modernize the rule and encourage continued recognition of the operational realities and practical compliance pathways available to the retail sector.

## **Washington Retail Association Comment on Updates to WAC 173-350 (Organic Materials Management Rulemaking)**

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