

Black Earth Compost (Andrew Brousseau)

Hello, I own a compost business in Massachusetts but I have lived and worked in Washington in the Organics Waste Management field. Nationally you need to understand that there is a push by Anaerobic Digesters (AD) with their depackagers to grab all the food waste feedstock. Yes AD does create a lot of capacity to dispose of food waste, but it is the lowest form of management and often is not even recycling. Any state like Washington will benefit more if the food waste can be used to breakdown yard waste and produce a soil amendment. Soil amendment's improve soils in the state for growing plants. Plants provide us with food, fiber, building material etc. Putting rich organic matter into the soil is like depositing into the soil bank for future withdrawal of plants.

-AD connected to WWTP's do not achieve this (N is pushed out using energy, P ends up in biosolids which are hard to recycle but WA does a good job, and the K is washed out to the ocean because it is a salt).

-AD connected to a farm is a little better, but the liquid digestate is where all the nutrients land. Digestate does not increase soil organic matter and is often over applied around the farm. The AD's often have to pay the farmer to make the digestate go away, which is a perverse incentive that leads to over application.

-Compost on the other hand is a finished product that people will pay for.

What WA can do:

-Source separation is very important with food waste because we are making a product that goes to our food supply. Single stream with recycling might be ok because we are not eating the products from recycling. Depackagers create microplastics which end up contaminating the final digestate or effluent from the WWTP.

-Despite that, composters can handle contamination better than AD because we get it out while it is still large, rather than macerating the contamination in a depackager. 2% is too low a threshold.

-Source separated organics SSO should not be allowed in plastic bags (sometimes used for collection). This means that SSO must go to a depackager which excludes composters from the market. Composters rarely have depackagers especially smaller ones. Decentralized composting at many small sites provides the most benefits to a state because of reduced trucking and reliance on centralized facilities.

-SSO should not be mixed with packaged food. That takes a clean stream and turns it into a dirty stream. Vermont has a law against this.

-Certified Compostable packaging is a path forward for the microplastics problem. It has higher standards than existing FDA packaging rules and a depackager would much rather want a compostable microplastic in their effluent than a conventional microplastic that will take much much longer to break down in the environment.

-It is important that you look at this from a lens of the dynamics of competition between AD and Composters. The EPA's highest and best use scale clearly states food waste composting as higher. You need to recognize that incentives within the energy sector (renewable energy credits) create a distortion within the organic waste management sector that drags organics down the EPA's highest and best use scale. If WA crafts laws that also bias towards AD then composters are really stifled from growth. Why should AD get subsidies and laws written for them? Is that fair within the market?

Finally, be very careful of following California's lead in their rush to get food waste out. This will just lead to an AD future because they have large capacity and the rush does not allow time for the culture of source separation to grow. Instead follow Massachusetts' lead of a slow roll out which is

allowing composters to compete.

Thank you, I am happy to speak more with you if you have specific questions,
Andrew Brousseau