December 12, 2025

Washington State Department of Ecology
Solid Waste Management Program

RE: Organics Management and the Importance of Practical, Affordable Solutions for Grocery Retailers

To Whom It May Concern:

Thank you for the opportunity to provide public comments on the draft rules being proposed to update the state's management of organic materials. The Northwest Grocery Retail Association, whose membership includes chain, family owned and independent retailers in Washington, Oregon and Idaho has over 455-member store locations in Washington employ over 66,000. Our members share Ecology's goals to reduce waste headed to landfills, protect the environment, and support responsible food recovery across the state.

Landfilling is always our last resort, and often the most expensive option. Our members want to keep reducing landfill tonnage, but we must do so practically and affordably. Washington's stores depend on multiple types of service providers because each handles different materials efficiently. Many grocery products, especially packaged food, simply cannot be managed by composters without specialized equipment.

For this reason, we support policies that maintain choice and competition in the organics sector. A healthy, competitive marketplace helps us reduce contamination, lower costs, and increase diversion. We appreciate Ecology's intent to strengthen contamination standards. Retailers already work hard to keep organics clean by separating recyclables, trash, and food at the store level. However:

- New operational mandates—such as splitting packaged and unpackaged food into entirely separate systems—would place significant burdens on stores without meaningfully improving environmental outcomes.
- Additional depackaging requirements placed on stores would be counterproductive, as depackaging is a processing step that belongs with specialized service providers—not in grocery backrooms.
- Regulations should support the work stores are already doing well, not make it more complicated or costly.

As we expand food recovery programs, we must ensure that costs remain manageable, operational requirements are practical for stores of all sizes, and retailers can partner with the service providers that offer the most efficient, environmentally sound solutions. Policies that limit competition or steer materials toward one type of processor over another risk raising costs, reducing efficiency, and ultimately undermining diversion goals.

Washington's grocery retailers remain committed to reducing waste, supporting donation and recycling, and working with industry leaders to keep materials out of the landfill. We support Ecology's effort to modernize organics rules, and we encourage the Department to ensure that:

- regulations remain practical for store operations,
- multiple processing technologies remain viable,
- contamination standards are consistent and achievable, and
- affordability is considered at every step.

Thank you for your work on this issue and for your partnership in strengthening Washington's food recovery and organics management systems. We look forward to continued collaboration.

Sincerely,

Amanda Dalton
President & CEO
Northwest Grocery Retail Association