Madeline Shepard

As a supporter of the benefits of source-separated organics to ensure quality feedstocks for composting and to not increase the diversion of packaging waste to landfills that could effectively be recycled; I want to register my comments in support of meeting the intent of the Washington State's Organics Management laws to divert more materials from landfills and support the State's composting infrastructure.

Washington State has been a national leader in advancing food waste diversion and composting. Over the past several years, the Legislature has passed numerous laws to increase organics recovery and build strong composting infrastructure across the state. The current rule draft is jeopardizing this progress.

In the Pre-Processing Section (page 61) I ask for the establishment of strong, Vermont-style depackaging standards that maintain source separation and prevent contamination.
Some ideas include:
Inbound contamination limits
Mandatory recovery rate of 90% of accepted materials
Prohibition on accepting easily recyclable materials
Prohibition on commingling packaged food with pure food waste
Prohibition on sending pure food waste through a depackaging machine

In the Definition Section, remove or revise provisions that rewrite statutory definitions for "organic materials" (page 6), "source separation" (page 53), and shift ownership away from generators (page 8).

Protect and expand compost infrastructure by adopting practical, achievable contamination reduction policies upstream and training requirements for facilities (page 105).

We do not believe that increased compliance burdens and restrictions at the facility without upstream changes (starting on page 75) are the answer.

In section 220 and 225, require training minimums for all organics management facility operators to mirror those they have drafted for compost facility operators.

We have seen the negative impact on the composting and recycling industries in states such as Maine, Massachusetts, and Vermont when non-source-separated organics collection invited large generators (groceries, food distributors, etc) to toss ALL inedible food waste, including previously source-separated organics, into the same dumpsters. This has forced advocates in Vermont to push for what has been a lengthy process in the State of Vermont to reaffirm the intent of its landmark source-separated organics law, yet many composters never recovered, leaving a deficit of compost for healthy soils in that state.

I am concerned that the "green" State of Washington could face similar impacts on its robust and developed compost industry, and will put at risk healthy soil policies that produce needed quality compost.

Please work with the State of Washington's composting and recycling industries to ensure that fair and appropriate levels of inbound contamination are fairly set for the composting and depackaging industries; while maintaining the intent to source-separate unpackaged and easily recycled organics for composting.