

August 13, 2026



Director Casey Sixkiller
Washington State Department of Ecology
P.O. Box 47600, Olympia, WA 98504-7600

Re: Comment on Chapter 173-350 WAC - Organic Materials Management Proposed Rule

Dear Director Sixkiller,

We appreciate the opportunity to provide comment on *Chapter 173-350 WAC – Organics Management Proposed Rule*. Zero Waste Washington's mission is to drive policy change for a healthy and waste-free world. We envision a just, equitable, and sustainable future where we all produce, consume, and reuse responsibly.

We appreciate the hard work that Ecology staff has put into the rulemaking process, including the outreach to stakeholders.

We have the following comments:

- **Definitions.** We have concerns with backsliding in some of the new definitions or definition re-wording. Food processing waste, for example, should not include packaging. "Organic materials pre-processing" inappropriately refers to solid waste rather than organic waste.
- **Depackaging regulations.** While Zero Waste Washington does not oppose depackaging if done well and appropriately. But in practice we are concerned that the method Ecology takes in the rule will lead to food and food slurry contamination of packaging materials that would otherwise be recyclable. Source separation, per legislative statute, should be the primary approach. And we believe that Washington should follow the lead of Vermont and support a pathway for lightly packaged food (such as apples in clamshells or bags) and a separate pathway for heavily packaged food (such as yogurt containers). Furthermore, the rule lacks performance standards for depackaging.
- **Lack of training requirements.** We have heard from numerous experts that training, and refresher training, is critical for strong environmental outcomes, safe operations and efficiencies at organics management facilities. The draft rule, however, has weakened training requirements instead of moving forward with consistent, technical training requirements for all organics management facilities, which is standard for others such as wastewater treatment facilities, landfills, incinerators, etc. Training programs are available across the spectrum.
- **Contaminant limits.** We support strong limits and would like to see Ecology create a pathway for required stringent limits.

Thank you for consideration of our comments. I can be reached at (206) 441-1790 or heather@zerowastewashington.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Trim", written over a light blue horizontal line.

Heather Trim
Executive Director