

Town & Country Markets (Marina Heppenstall)

Dear Mr. Fredley,

As a family-owned grocery retailer committed to sustainability, Town & Country Markets appreciates the Department of Ecology's efforts to improve organic waste management across Washington. Thank you for the opportunity to comment on this important issue, which will have a significant impact on how the grocery industry manages its organic waste streams going forward.

T&C has a long-standing commitment to waste diversion, including robust food donation and composting programs. Our goal is to donate as much edible, unsellable food as possible to local food rescue organizations and compost the remainder. In our experience, most food can be donated when an effective donation program is in place. The organics that remain suitable for composting are primarily unpackaged, although a small percentage of packaged food waste presents operational challenges.

For that reason, we would like to raise a concern about the proposed revision to the definition of source separation. Ecology's proposal appears to allow a container holding both packaged and unpackaged food to be considered source separated, provided it remains separate from garbage. We do not believe this is the most effective approach to managing organic materials. In our experience, the majority of food waste generated by grocery stores that have robust donation programs is unpackaged and can be easily separated. Ecology should prioritize source separation of clean organics while allowing depackaging facilities to focus on processing packaged food waste.

While depackaging facilities play an important role in managing packaged food waste, their use can have unintended consequences, including reduced compost quality, increased microplastic and other contamination risks, and diminished opportunities to recycle packaging materials. These facilities are essential for handling heavily packaged items, but they should not be used as the primary destination for clean, unpackaged organics. We encourage Ecology to consider Vermont's approach, which requires packaged food waste to be kept separate from clean food waste at the point of generation. We also recommend that Ecology define "packaged food" directly in the rule to provide clarity and support consistent implementation by retailers.

Thank you for your consideration.

Sincerely,

Marina Heppenstall
Director of Sustainability
Town & Country Markets