

August 12, 2026

Dear Mr. Fredley,

Sustainable Generation LLC (“SG”) respectfully submits these comments on the proposed Organic Materials Management rulemaking. SG is a multinational manufacturer and distributor of fully commercialized, industrial-scale composting systems and technology. Through our work with customers that own and operate more than 100 facilities across North America, Central America, South America, and Oceania—and through our study of mature organics diversion and recycling systems in Europe—we have consistently found that successful programs begin with clean separation at the source through Source-Separated Organics programs. Source separation produces lower overall recycling-system costs and higher-quality end products than systems that rely on downstream sorting technology to address upstream commingling. We encourage Ecology to draw on this broader experience as it finalizes the rule.

In general, composting is a complex business to run well. Typically, the responsibility falls on facility operators to manage feedstock quality including contamination control in addition to the biological process, odor and market demand for the final market product. They often do this on thin margins. Best practice in the markets we know supports and nurtures this industry. It does not layer on regulatory burdens that raise costs without a clear benefit. We ask Ecology to keep that balance in mind.

Referencing the proposed Organic Materials Management rulemaking, SG would like to flag a few specific concerns with the current draft:

The proposed rules add costly requirements for composting facilities, including tighter finished-product contamination standards, without addressing contamination at its source. Composting facilities have limited control over the materials delivered to their gates. Tightening standards only at the finished-product stage therefore shifts cost and risk to facilities that did not create the contamination, while the draft provides no corresponding upstream controls.

At the same time the draft still sets no meaningful standards for depackaging and pre-processing facilities. There is no inbound contamination limit. There is no minimum recovery rate. There is no restriction on accepting material that would otherwise be recycled. This creates an uneven system. Facilities doing the most to keep streams clean face the most stringent rules. Facilities built around commingled and contaminated inputs face almost none.

SG also wants to flag the draft's permitting exemption for depackaging operations that are integral to a permitted compost or AD facility. This exemption removes oversight that would otherwise apply. It lets these operations accept material with little accountability for what they recover versus what they landfill.

SG recommends that Ecology maintain source separation as the foundation of Washington's organics management system and avoid imposing disproportionate requirements on composting facilities that are already operating effectively. Any new standards should be applied consistently across composting, anaerobic digestion, depackaging, and other pre-processing operations so that regulatory burdens and accountability are distributed across the full system rather than concentrated on a single segment.

Thank you for your consideration of these comments.

Sincerely,



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