

Washington Food Industry Association (Molly Pfaffenroth)

August 13, 2026

Department of Ecology organicsrule@ecy.wa.gov

RE: Rule Amendment Changes – Chapter 173-350 WAC – Organics Management Rulemaking

Thank you for the opportunity to provide feedback on the organics management rulemaking. The Washington Food Industry Association represents independent grocery stores, convenience stores, and their suppliers across Washington state. Our members support the state's organic waste diversion goals because keeping food scraps and other organic material out of landfills reduces methane emissions, encourages food donation and source reduction, and supports better environmental outcomes. We also support efforts to reduce packaging contamination in compost and soil amendments.

We are pleased that the latest draft rules do not add costly and time-consuming new restrictions to commercial facilities, which would require our stores to source separate and depackaging in-house. We also appreciate the ability to utilize regulated depackaging facilities. These facilities remove non-recyclable packaging and other incidental contaminants before organic material is composted, digested, or otherwise processed. The alternative proposal would shift much of that work to individual stores.

Our stores should not be required to manually remove packaging by de-sleeving cucumbers, emptying egg cartons, opening fruit cups, and dumping food from cereal boxes. This would require additional employees, training, equipment, and stockroom procedures to maintain food safety compliance. Our stores operate on thin profit margins of 1%, meaning these costs could lead to higher prices, reduced spending elsewhere, or a return to landfilling unsold food when manual depackaging is too expensive.

Raising the contamination limit to 5% to allow processors to accept substantially more plastic and other non-organic material without pre-processing is the right step to ensure that commercial generators have options beyond depackaging. Grocers use several methods to manage unsold food, including food donation, composting, anaerobic digestion, animal feed, and source reduction. State policy should encourage the best environmental outcomes rather than favoring a particular waste management pathway or outdated processing methods.

Washington should finalize Ecology's original diversion and contamination proposals, maintain strong standards for incoming and finished materials, and hold processors accountable for removing packaging and contaminants. The state can protect soil quality and keep organic material out of landfills without imposing costly manual processing requirements on stores or weakening environmental safeguards.

Sincerely,

Molly Pfaffenroth
Government Affairs Director

Washington Food Industry Association



Washington Food
Industry Association

Supporting and representing the neighborhood grocers, convenience and specialty retail stores, suppliers and distributors that make up the fabric of our communities in Washington State.

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