

WA State Department of Agriculture (Katie Rains)

These comments reflect input from WSDA programs spanning the Focus on Food initiative. Thank you for your work on this rulemaking & for your consideration!

Page 1 – Definitions, section d. of Beneficial Use:

- WSDA Animal Feed program manager recommends updating this definition to "using food scraps or organic materials as animal food consistent with state and federal law." From Ashlee-Rose: "That is the language that industry is moving to call themselves, and it better encapsulates all sectors, e.g., livestock+ feed, pet food, specialty pet food, intended ingredients."

Page 2 – Is it a purposeful to create a new definition for Edible Food Donation Organization distinct from Donated Food Distribution Organization (DFDO), which is included in the retail food code?

More definitions without clarity about what's different regularly confuses stakeholders and results in more government acronym jargon. This may not require a change to the definition, but WSDA would recommend supplemental resources to clarify how these definitions fit into the parallel regulatory environment of the Retail Food Code.

Page 7 – Application process

Currently it does not appear to allow for any possibility of collaborative administration of any funds for this grant program, though WSDA Food Assistance currently administers an annual competitive grant program eligible to 501c3 nonprofits and tribes for activities that include food rescue. WSDA is not concerned about competing with Ecology in grant administration – we remain eager to offer continued partnership if it can streamline processes for prospective grantees working on the hunger relief side of this effort and not further strain their limited administrative capacity.

Page 10- Consider adding technology to support implementation as an allowable cost under the Edible Food Rescue and Prevention category.

WSDA receives very limited GFS, MTCA and CCA funding and does not have capacity for increased funding for outreach & education to support increased outreach and education with Commercial Feed Licensing and Food Recovery Compliance. Please consider partnership with WSDA Animal Feed program if that becomes a higher priority in a given grant cycle.

If you specific SME questions for our Animal Feed program, please contact Ashlee-Rose Ferguson, Program Manager 360-902-1905 or AFerguson@agr.wa.gov. For all other follow-up please reach out to Katie Rains any time. Thank you!