



June 24, 2026

To Chris Fredley and the Washington Department of Ecology,

The Biodegradable Products Institute (BPI) is North America's leading authority on compostable products and packaging, certifying over 50,000 products from collection bags to food containers. For more than two decades, BPI has given composters and consumers confidence in compostability claims with the backing of science-based standards, while enabling authentically sustainable choices for brands and packagers. BPI champions a systems-wide transition to the circular bioeconomy through rigorous testing, policy advocacy, and industry collaboration, building the infrastructure for "A World Without Organic Waste"—where food scraps and certified compostable packaging become resources.

We appreciate the Department providing an opportunity to comment on draft rule language. We have consistently supported the appropriate inclusion of compostables and support for compost systems into statewide EPR laws and we look forward to the Department realizing the statute to that end. With that said, we have a couple clarifying questions:

On 173-950-030 Selected Definitions:

If covered materials include *“Service packaging designed and intended to be filled at the point of sale, including: (A) Carry-out bags; (B) Bulk food bags; and (C) Take-out and home delivery food service packaging;”* are grocery produce bags included under the definition of ‘bulk food bags?’ If not, are they otherwise included in this category based on their design and intent?

On 173-950-100 Producer Duties:

Certain covered materials may meet statewide requirements for multiple EOL pathways, such as compostability and recyclability—how does the Department view producer reporting requirements for such materials? In other words, would “providing all required information and data” necessarily include all possible EOL pathways?

Please reach out to us with any questions or concerns.

Alex Truelove,

Senior Policy Manager

alexander@bpiworld.org