CEDAR GROVE®

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Washington State Department of Ecology
Submitted via online comment form

Re: Comments on the Draft Washington Preliminary Needs Assessment (Publication 26-07-077)

To whom it may concern:

Cedar Grove Composting appreciates the opportunity to comment on the Draft Washington Preliminary Needs Assessment (Publication 26-07-077). Our central concern is contamination. The Recycling Reform Act requires producers to help pay for removing covered-material contamination at composting facilities, but the draft does not appear to assess that contamination or its cost. Washington, fortunately, already has a good portion of the composting capacity to manage compostable covered materials should those be included in the program in the future. We also generally support the direction of the Needs Assessment and its findings.

Cedar Grove is Washington's largest compost manufacturer. Our Everett facility processed over 100,000 tons in 2025 under a 228,000-ton permit, and our Maple Valley facility processed over 200,000 tons under a 250,000-ton permit. We have been serving local jurisdictions with residential organics processing for over 30 years and have deep operational expertise and knowledge managing residential feedstocks and associated contamination.

Our comments address the following points:

1. Contamination from covered materials arriving at compost facilities must be assessed and reimbursed, as the law requires.
2. Compostable packaging is a small share of organics throughput, so processing capacity is not a limiting factor in our area. Food waste is already accepted in nearly all municipal jurisdictions we service.
3. The assessment should analyze demand for finished compost, not only facility acceptance of packaging.
4. The claim that composters decline compostable packaging to protect organic-farm markets should be verified with sales data.
5. Multifamily organics should be measured by participation as opposed to availability.

1. Assess and reimburse covered-material contamination at compost facilities

The Recycling Reform Act requires reimbursement rates to reflect the cost of removing contamination from covered materials at composting facilities. Plastic, glass, metal and other packaging arrive at compost facilities every day, and compost facilities must pay to remove and dispose of it. The draft never assesses that contamination or its cost, even though reimbursement rates must be built on needs assessment cost data.

What the law says

- **Processing and removal.** Reimbursement rates must reflect the cost to "remove contamination from covered materials" at a "composting facility" (RCW 70A.208.170(2)(b)(iii)(A)).
- **Managing what is removed.** Rates must also reflect the cost to "manage contamination removed from collected covered material."
- **Collection.** Rates cover "a proportional share of composting," adjusted for regional conditions including the quality of collected material.
- **Covered services** include "disposal of contamination or residuals" (RCW 70A.208.020, as quoted in Section 3.2 of the draft).
- **Cost data.** The reimbursement methodology must draw on needs assessment cost data. The full needs assessment must assess the level, causes and cost of contamination in source-separated compostable materials and recommend a reimbursement methodology.

Why this applies to composters

The plain text of RCW 70A.208.170 supports reimbursement for compost facilities. The provision covers costs incurred "by a recycling or composting facility." It does not limit reimbursement to covered materials on the statewide composting list. Covered material means packaging and paper products introduced into Washington, whichever cart a resident puts them in. A clamshell or film bag in an organics cart is covered material, and removing it is a cost of contamination from covered material. Covered services include managing covered materials for composting or for "disposal of contamination or residuals" (RCW 70A.208.020). A composter removing and disposing of packaging is providing a covered service, which makes it a service provider. Rates must also reflect the cost to "manage contamination removed from collected covered material".

Reimbursement for disposal of contamination under the Recycling Reform Act was presented as a selling point to Cedar Grove and other compost companies as part of the legislative process resulting in the law.

The draft, however, treats contamination only as a reason facilities decline compostable packaging (Sections 7.1 and 7.3). It does not look at contamination arriving at compost facilities from upstream: what it is, how much there is, where it comes from, or what it costs to remove and dispose of.

The draft's own data shows covered materials arriving in the organics stream. Table 13 estimates about 16,800 tons of covered materials in residential organics in 2024. The Organic Facility Survey asked about contamination (Section 7.2), but the draft reports no results. If the needs assessment does not capture these costs, the reimbursement methodology built on it is likely to leave them out. Compost facilities would then carry the cost of producers' packaging that residents put in organics carts.

Cedar Grove's experience

Cedar Grove has invested millions of dollars to prevent and remove contamination at every stage of our process:

- **Upstream.** Dedicated staff work with the businesses and haulers that supply us. Loads that don't meet our standards are photographed and rejected, and we follow up with that customer on training and education.
- **On site.** Building monitors pull contaminants by hand. Our screening system, one of the largest of its kind, uses magnets to remove metal and 26 dedicated suction points to remove plastic film. Material is then screened a second time.
- **Finished product.** Washington law requires us to test finished compost for heavy metals, pathogens and physical contaminants, including plastic. We comply with all testing requirements and consistently meet those standards.

We receive material from an enormous number of households and businesses, and what arrives reflects what all of them put in their carts. At that scale some contamination will reach the facility no matter how good our systems are.

Suggestions

- Add an analysis of contamination arriving at compost facilities: types, amounts, sources, and how much is covered material.
- Report the contamination results from the Organic Facility Survey.
- In the full needs assessment, quantify composters' costs to prevent, remove and dispose of covered-material contamination, under RCW 70A.208.110(4)(m), and carry those costs into the reimbursement methodology.
- Consider adding certified compostable bags and film to the residential composting list.

2. Capacity is not a limiting factor for compostable packaging

The draft itself acknowledges that "compostable packaging is expected to represent a small share of throughput" (Section 8.3, note to Table 27). We agree with this finding and think it should be emphasized.

The draft also recognizes that compostable products are processed with yard waste, green waste and food scraps rather than as a separate stream (Section 7.3). Compostable packaging rides along with feedstock these facilities already handle at scale. This point is limited to compostable covered materials; organics facilities see significant seasonal peaks, and meeting the Organics Management Law's 2030 goals will require additional organics capacity statewide.

Suggestions

- Move the statement that compostable packaging is a small share of throughput from the note to Table 27 into the Section 7 and Section 8 key findings.
- Consider stating in the findings that existing composting capacity is sufficient for projected volumes of compostable covered materials based on the current data.

- Describe the barriers facilities reported (contamination, processing time, market specifications) as conditions for acceptance.
- Direct the full needs assessment to focus investment for compostable materials on contamination management and collection, rather than new processing capacity.

3. Analyze demand for finished compost

The end-markets section treats compost facilities as the end market for compostable packaging, but it never examines who buys the roughly 620,000 tons of finished compost Washington produces (Table 25), at what prices, or under what specifications. About a quarter of survey respondents raised end-market concerns, including organic certification and contamination limits (Section 7.3). See Comment 4.

Suggestions

- Have the full needs assessment evaluate finished-compost demand under RCW 70A.208.110(4)(l), including public procurement under Washington's organics management law (HB 1799, 2022).
- Address the 2025 Compost Market Study's findings in the report; it is cited but not discussed.

4. Verify how much compost is actually sold into certified organic agriculture

The draft accepts that composters decline compostable packaging to protect organic certification and access to organic farm markets (Sections 7.1 and 7.3). The certification limit is real, but the draft gives no evidence of how much Washington compost is actually sold to certified organic farms. The needs assessment is a good opportunity to verify the underlying information before it shapes statewide policy on compostable packaging.

Ecology's 2025 Compost Market Study also notes that facilities serving organic farms cannot accept food waste containing compostable serviceware (Section 3.5). What is missing is the scale of that market.

The draft's evidence is fairly limited:

- The statement rests on comments from "some" of the 24 responding facilities, with no count, no tonnage and no share of sales (Section 7.3).
- Facility annual reports to Ecology record compost produced, not where it is sold or to whom.
- The draft cites the 2025 Compost Market Study but does not report its findings on compost end markets.

Suggestions

- Report how many responding facilities cited organic certification as a reason to decline compostables, and what share of their sales goes to certified organic agriculture.
- In the full needs assessment, quantify compost sales by end use statewide, including the share sold to certified organic farms.
- Evaluate separate product lines as a way to protect organic markets while expanding acceptance of compostable packaging.

5. Measure multifamily organics participation, not just availability

We agree with the draft that availability is a weak measure of multifamily organics service, and that participation is what matters. The draft reports curbside organics available to 60 percent of multifamily residences statewide (Table 18). Reported multifamily participation is only 5 to 43 percent in the three regions with data, and none was reported for the Eastern region (Section 6.3).

The draft explains the gap. Availability "does not mean residents subscribe to or use it," property managers may decide whether a building receives service, and shared containers make participation hard to measure (Section 6). Haulers also often group multifamily collection with commercial routes (Section 4.2), which hides multifamily results.

For composters, multifamily performance matters for quality as well as quantity.

Suggestions

- Support the draft's recommendation to measure actual participation rather than assume it (Section 10.3), and make multifamily participation a core metric in the full needs assessment.
- Measure multifamily organics by capture (tons per unit) and contamination rate, not only by whether service is offered.

Thank you for considering these comments, and for the time and effort put into the statewide Needs Assessment.

Respectfully,
Jay Blazey
General Counsel, Cedar Grove