

## Meeting #9 Agenda (November 1, 12-2pm): Contamination, Education & Schools

- I. Welcome and Overview of Agenda (12:00-12:05)
- II. Ian Brown, Resource Conservation Specialist, Seattle Public Schools + Q&A (12:05-12:20)
  - a. Discussion about whether paper trays are certified, compostable, and able to be disposed with the food waste cause – especially if they're food soiled, how many elementary schools have 20-minute seated lunches, helping students balance carrying their lunches with recycling/waste collection, Maryland's passage of House Bill 566 requiring new schools be equipped with infrastructure for organic collection, evaluating cost of single-use versus reusable trays, secondary containers, purchasing and procurement, and guidance for mandatory recycling or composting.
- III. Jay Blazey, General Counsel, Cedar Grove + Q&A (12:20-12:35)
  - a. Discussion about the [NoCRAP system from AMP Robotics deployed in San Antonio](#) and optical sorting, enforcement at the curb and enforcement for commercial, privacy issues and a pathway for enforcement, contamination protocol, and workarounds to make sure you can fully check for contamination.
- IV. Samantha Winkle, Assistant District Manager, Waste Connections + Q&A (12:35-12:50)
  - a. Discussion about what's done with overs and whether there is higher contamination in materials from communities that haven't had organics collection before.
- V. Policy Feedback: Contamination, Education & Schools (12:50-1:55)
  - a. Contamination Reduction/Education:
    - i. **Ban non-compostable produce stickers**

### **Input: Ban non-compostable produce stickers**

- Kate K.: Strong support of this. Stickers are a nuisance. It's also an issue in the wastewater stream.
  - Hannah S., Michael W., Jenna M., Gena J., Janet T.: Agree to ban them.
- Rose G.: Need to understand and do research how likely it is and what the source of the stickers are. It can be imports from other countries. Might be easy for in-state, but hard for out of country or state. Is there an opportunity to give further feedback?
- Samantha L.: Pretty sure that stickers come from federal regulation standard and we should further understand that federal regulation. Fruit tree growers and agricultural groups should be invited for this conversation.

- Heather T.: This is not banning stickers. It's banning non-compostable stickers. There could be alternatives available with information required by the federal level. This is already in effect internationally like NZ. What NZ did was to give a few more years for international approval and imports and would propose this for Washington.
- Katie B.: On behalf of Washington Food Industry Association, Samantha captures concerns well. Concerned about enforcement and what this looks like for individual stores that aren't putting these stickers on produce and getting them from distributors. Appreciate Heather's comment about the expanded timeline about international produce. Would need to be a larger discussion at the grocer level.
- Alex T.: Great application for composability. Produce comes from all over the world and think an effort toward a unified specification or allowance for similar specification that might exist in Europe, NZ, or Australia would be best. Want to make sure we aren't excluding different types of produce from all around the world.
- Sara O.: Our team has looked into this. For compostable stickers, we would need to be assured by performance test. They've seen some compost too quickly. Really need performance tests before transition for all stickers.
- Alex T.: For what it's worth, Canada has also proposed requiring stickers to be compostable.
- Carl S.: Re: stickers, seems reasonable.

ii. **Increase enforcement (and possibly authorities) related to contamination in incoming organics feedstock (commercial and residential)**

**Input: Increase enforcement (and possibly authorities) related to contamination in incoming organics feedstock (commercial and residential)**

- Heather T.: Would like to see something like what Kirkland is doing as a statewide standard. Not sure how that would work but need research. Fundamentally, there would be a level playing field across cities and counties at compost facilities so it's not one hauling facility is the bad guy because they're doing the enforcement. It's something that's more statewide. Would like to see funding to help support.
- Kate K.: City of Seattle also in support of enforcement requirements. We don't want a hauler to be disincentivized from enforcement.
- Julie G.: Not familiar with what Kirkland standard is. Since 2019, City of Vancouver has a contamination reduction plan with our collection contracts, including material streams for recycling and organics, which is food/yard debris from single family customers. While it's enforcement and could be framed that way, it is also good customer service. We do contamination reduction approach with customers and did that at onset of the program. Have found that it's been very useful for the community in delivering education. Most enforcement is follow-up so there's more than one-touch approach. Contamination reduction wasn't required, but looked at it through a commodity stream that we want to maintain material quality. We encourage increasing education and enforcement at the customer level. Though, that's very costly and comes down to who

pays for it. Included a cart tagging/Oops tagging approach. Started with a four-touch approach. Work with customers on multiple levels to maintain service, but can also pull service if problems persist.

- Heather T.: Sounds similar to Kirkland approach.
- Rose G.: Is there a plan to require organic composting for commercial accounts at this point? In other cities where they have these programs – is there a difference in compliance between residential and compliance?
  - Heather T.: Commercial already required as part of 1799. Other types of contamination are already coming in from each stream.
  - Kate K.: If you're interested in seeing organics composition, including contaminants coming from different sectors, you can check out Seattle's reports here: <https://www.seattle.gov/utilities/about/reports/solid-waste/composition-studies>
- Kate K.: Seattle also uses a progressive outreach approach for contamination reduction across all three streams.
- Jenna M.: Yes, put into contamination into waste contracts.
- Chris T.: One concern about focusing only on feedstock is that it can disincentivize residential and commercial waste generators from putting the organic material in the bin in the first place, which would negate the progress we're all trying to make in addressing methane. I would suggest that instead of focusing on organics feedstock (since it's very challenging to enforce what individuals/customers put in their waste carts), I think we should consider placing a regulation on the processors' finished product, and on the amount of microplastics / contaminants that should be allowed in finished compost, biosolids, or digestate being used for soil amendment or agricultural purposes (this could be from anaerobic digesters or compost facilities or other processing operations). If red states can work on regulations addressing microplastics in finished products and limit the number of contaminants of a certain size, then Washington State should be able to consider this as well.
- Rodd P.: Local health departments have expertise and experience with enforcement, but they need funding support to enable them to expand those functions to cover much wider organics programs.
- Sean K.: It's going to be difficult for processors to be an enforcing authority. By the time contaminated loads reach a processing site, tying the contamination back to a generator (customer) is next to impossible. Enforcement would need to be at the point of collection, if anything.
  - Rose G.: Like that idea.

### iii. Foodware

1. Ban specific foodware products (compostable)
2. Incentivize certain foodware (compostable) to be accepted
3. Prohibit green/beige coloring on non-compostable foodware (to reduce confusion)

**Input: Foodware**

### Ban specific foodware products/Incentivize foodware

- Kate K.: City of Seattle recommends waiting for Ecology workgroup findings since we discuss compostable serviceware. This is the workgroup that was mandated through HB 1033 in the 2023 legislative session.
- Dan C.: False dichotomy. Third option is not identified, which is to allow cities and organics processors to decide on their own whether to accept or not accept it. They are the best folks to determine that. The whole discussion between banning compostables or including them all doesn't account for the third option we are currently doing.
  - Sean K.: To Dan's point though, a standardized approach statewide instead of jurisdiction/processor specific, will make it easier for program participation for residents. If all the same materials are accepted or banned, education can be more uniform, as can participation.
  - Heather T.: Strongly disagree. The issue here is confusion across the state and a lot of contamination that we have across the state. If we ban, it would mean that facilities that take certain things would no longer take them. This means that more things would go to the landfill. Instead of things making a trip to the compost facility and then landfill, it would go to landfill quicker. As we move to reuse in our system overall, this would become less of an issue. Strongly disagree with status quo. Don't think the status quo is working. A lot of large compost facilities around the U.S. are announcing that they are not going to take compost products anymore. There is a movement for large facilities that have been taking products to no longer take them.
    - Samantha W.: Would you say that certain compost facilities are going to have to take a list of product that you're suggesting?
      - Heather T.: Would be a further discussion, but yes would need to look at that by product. For example, paper napkins. Many facilities across the U.S. are starting to announce that they aren't taking them and other compostable foodware.
    - Tim O.: Agree that status quo is not working. Studies show the more you have to screen out of your product stream, the more good product you lose with it. Currently, compostable plastics are not degrading fast enough to meet the vast majority of compost processes. Work needs to be done there in the formulation perhaps. When we have waste streams that combine compostable and non-compostable serviceware, there isn't a separation technology that can discern those differences. We have to be eyes open to the technical problem that we are up against. After 21 days of active composting at 150F, >18%O2, and 100% RH.
  - Samantha L.: Question about compostable products in the waste stream and identifying what is compostable and what's not. If you cannot decipher whether a product is compostable, are you recommending we move away from compostable products and moving to recyclable products? What is the solution?
    - Heather T.: Yes, maybe move to wooden forks and don't allow certain compostable products.

- Rodd P.: Simultaneously with our process of investigation and planning, municipalities are moving ahead to ban disposable foodware in favor of compostable items, many of which are problematic for composters. No point in working at cross purposes, but the train is leaving the station.
- Samantha L.: On behalf of Hospitality Association, having hard time with policy objective. We have not implemented 1799. Some places can take the compostables and some can't. Banning is like negotiating against ourselves and limiting future options. Don't agree with this policy.
- Janet T.: Agree that it's too early to have this conversation. I think the advisory committee needs to do its work. Also have a fear that one of the implications of banning certain food service items leads the user/generator of the materials to where they don't have a compostable alternative. If they have a suite of compostable products and one recyclable product, it can become a contaminant instead of compostable.
- Rodd P.: Simultaneously with our process of investigation and planning, municipalities are moving ahead to ban disposable foodware in favor of compostable items, many of which are problematic for composters. No point in working at cross purposes, but the train is leaving the station.
- Alex T.: Agree that current system is not working. The realities about what composters are doing are nuanced – what they are taking and not. You can deal with contaminants based on what items you incentivize or not.
- Alli K.: Want to reiterate the goal of the 1033 advisory committee and mention the suite of research areas that workgroup is expected to research. Encourage people if they are not a formal member, they can sit in and listen to those conversations. The HB 1033 Advisory Committee is for the “Development of the standards for the management of compostable products.” You can access meeting materials here: <https://www.ezview.wa.gov/DesktopDefault.aspx?alias=1962&PageID=37917>.
- Jeanette H.: Clarity on problem being solved. If we're talking about broadly banning things, we need to be very clear about the problem that we're trying to solve and all the impacts.
- Julie G.: With a climate focus in mind, it's important to reflect on LCA studies done to evaluate the climate impacts of certain packaging and material attributes, including compostable products. Good research and work has been done by Oregon. Should consider how that can inform which approach to take on the topic of to ban or not to ban. To share specific reading: [1](#), [2](#). To Heather's point, Oregon Composters also released [this position years ago](#).
  - Alex T.: For what it's worth, this letter no longer reflects the positions of all composters in OG.
- Janet T.: We need to base these determinations on data not assumptions or anecdotal evidence. Many assumptions regarding compostable products are wrong.
  - Alex T., Shannon P: Agree.

**Prohibit green/beige coloring on non-compostable foodware**

- Kate K.: City of Seattle would be in support. The current language of discouraging is not enforceable and does not go far enough. Would also like clear language around fiber products. We see a huge amount of confusion for fiber-based food containers that are not actually compostable, but look like compostable products.
- Samantha L.: This topic came up with 1799. We have pushed back on using the color green and brown on packaging. It's going to be a challenge for many brands with green or brown in logos. What I would suggest is to revisit 1799 and the language that was passed in that bill and focus on an education campaign. Education can go to general public and manufacturers for what can be used on packaging or not. Would not support a ban on colors on packaging.
  - Heather T.: The intent would be to ban beige/green on foodware packaging so cups of clamshells or plates, things like that.
  - Samantha L.: Would you suggest that a company that has beige/green in its logo change just for Washington state?
- Alex T.: Note that with the passage of CO law, WA would not be the first state. They do distinguish =use of colors that are in branding and may be exempt.
- Tim O'Neill: [Neil Edgar responded to Richard Cohen](#) (founder of Elevate Packaging) on LinkedIn that sums up the current impact that "compostable" packaging has on the composting ecosystem.
  - "Did you know? Compostable Product Certification in USA covered all types of compostable materials, products and packaging but eventually narrowed its focus to just food-related and organic-related packaging." This is for a good reason: packaging almost invariably provides zero value added to compost, either in nutrients or other attributes of the finished product. If the packaging doesn't bring wanted organics, it has no purpose in a compost manufacturing system where the goal is producing high quality products. No packaging manufacturers would tolerate being forced to accept poor quality feedstocks which would jeopardize the marketability of their end product. "Today this shift is starting to be questioned by environmentalists and those seeking to reach zero plastic goals: Why exclude other compostable materials, potentially steering them towards landfills? This change certainly raises concern as it feels counterintuitive in our journey towards sustainability." No environmentalists who truly understand the need to embrace truly circular products are questioning the need to have composters produce only high quality compost and return it to soils. "By limiting certification, we're not just guiding non-food compostable packaging to landfills but also missing out on reducing methane emissions and improving soil health through broader composting efforts. Elevate Packaging we divert our compostable materials from landfill to have 100% of what's collected as compostable actually get composted." Packaging is in no way an asset to improving soil health, it typically leaves unwanted physical and chemical residues in compost products which create challenges for farmers and other users. While PFAS is under intense regulatory scrutiny, thousands of paper and fiber compostable products in the market still use it to enhance product performance. The minimal methane production from landfilling compostable packaging (again, less than 1% of all packaging) is no reason to have composters accept the contamination challenges that come with a great number of packaging products. "Doesn't it

make more sense to embrace all compostable packaging and materials, ensuring each item contributes positively to our ecosystem rather than adding to landfill woes?" NO!! Given the lack of identification for most compostable packaging, the lack of restrictions on look-alike products, the lack of National Organic Program compliance, the failure of most compostable plastic products to degrade in a timeframe consistent with other feedstocks, a major overhaul of most packaging design has to occur first.

**iv. Expand bans on toxic chemicals – pesticides (clopyralid, aminopyralid, and picloram)**

1. Background: Clopyralid is long lived herbicide that kills broad-leaved weeds (dandelions, clover, etc.). In WA, clopyralid is banned as a home lawn herbicide but is still registered for use on grass hay and some grain crops. (WAC 16-228-12371 (1) When labeled for use on lawns and turf including golf courses, pesticides containing the active ingredient clopyralid may be applied on golf courses if no grass clippings, leaves or other vegetation are removed from the site and placed in composting facilities that provide product to the public).
2. In Oregon, crops treated with clopyralid are banned as composting feedstock.

**Input: Expand bans on toxic chemicals – pesticides (clopyralid, aminopyralid, and picloram)**

- Heather T.: The proposal would support is to align with Oregon in terms of clopyralid. Perhaps set up a study for the other toxic chemicals.
- Kate K.: Mirror to Oregon, amino clopyralid. Crops that are treated with that chemical are banned from feedstock and aren't appropriate for composting.
- Rebecca F.: Are we recommending banning these chemicals or just saying products treated with them cannot be composted?
- Hannah S.: King County would support that as well.

**v. Regionally standardize local governments contracting processes with organic materials management facilities/service providers**

1. Include items like education, feedstock quality, cart tagging, and performance standards, etc.
2. State technical assistance

**Input: Regionally standardize local governments contracting processes with organic materials management facilities/service provider**

- Julie G.: Do we have a baseline to understand how local governments pursue contracting for collection or facility? This might be different based on jurisdiction, local government, size? The information available would inform opportunities here.

- Alex T.: Would this standardization apply to facility management (time, moisture, C:N)? We certainly struggle with not knowing the conditions our certified products might be processed in. I assume not but thought to ask.
- Sean K.: A statewide standard could be challenging. If you're looking to contract, some flexibility needs to be afforded, but this will vary from market to market, project to project, or municipality to municipality. It takes more than 10 years to develop infrastructure.
- Wendy W.: Some of local contracts have embedded recycling and organics. Standardizing our processes, we have to look at billing and customer rates as well.
- Carl S.: Need more information to understand what we're trying to accomplish with this. Standardizing the types of things that need to be considered in a contract as opposed to how those things are considered might be a way to go about it. This will cause some concerns among municipalities.
  - Heather T.: Very basic things not uniform across the state is what we're trying to get at, such as colors.
- Carl S.: Not sure about characterizing it as a contract issue. Would need to get into the details.
- Wendy W.: Add that switching out carts, sizing, colors is all done locally and in contracts. Would need to decide what that would do for ratepayers.
- Meara H.: Why just contracts with local governments and composters and not haulers? Contracting process – is that about standards or other pieces of contracting process? Would want clarification on those pieces.
  - Rebecca K.: Agreed with Meara. We don't have a direct relationship with composting facilities, nor do we plan to. We leave that up to our hauler.
- Kate K.: Standardizing bin colors across the state would be very beneficial.
- Samantha W.: Who would you use as the standard to determine the colors of said bins?
- Rodd P.: In some communities, the collection company is the entity interacting with the composter, not the municipality itself. Whether informally or under contract, those relationships are more complex than might be assumed.
  - Heather T.: Good point!

vi. **Implement better systems of source separation through incentives and sanctions**

1. Create well-designed setups that make source separation simple (ex: same color bin system across the state)
2. Multi-family building design requirements
3. Mandate education in multi-family residences (and possibly commercial buildings)
4. Cart tagging mandates
5. Food separately collected



## Input: Implement better systems of source separation through incentives and sanctions

- Kate K.: City of Seattle has a lot of comments – specifically on multifamily building design. New buildings need to ensure that there is sufficient space for all containers. All containers should be co-located so that we don't have spaces where there is only garbage available and not composting and recycling in the same space. On-floor solid waste access for all buildings with 5+ floors. Ensure all containers include color-coded and well-labelled signs. Require that renters receive up-to-date sorting guidelines (not just building managers).
- Heather T.: This is for new building/future construction.
- Dan C.: The City of Tacoma is interested in standardizing for MF to create space for the containers. When it comes to incentives/sanctions, when food waste is mandated, it makes it very difficult to put sanctions like removal of the cart. You can tag and education; might get away with a fine, but if you can't remove the cart, it becomes an issue. Pointing out that balance of trying to figure that out if you mandate food waste recycling. In some places, it's no individual or business, but collected from the neighborhood.
- Wendy W.: Enforcement is always tough. MF populations tend to be more migratory. Haulers pick up materials through bins they can't see through, and the receiving facility processes it. Education and outreach is key. Punitive measures along the way are tough to enforce. Carrots where we can and using sticks effectively will be key.
- Rodd P.: Re: "'this is only for future multi-family space for composting program containers and collection' - WAC 51-50-009 has already been updated to include composting, so the future is NOW. WAC 51-50-009: Recyclable materials, compost, and solid waste storage. For the purposes of this section, the following definitions shall apply:
  - COMPOST means biodegradable solid wastes that are separated for composting such as food waste, food soiled paper and yard waste. RECYCLED MATERIALS means those solid wastes that are separated for recycling or reuse, such as papers, metals and glass. All local jurisdictions shall require that space be provided for the storage of recycled materials, compost, and solid waste for all new buildings. EXCEPTION: Group R-3 and Group U Occupancies; The storage area shall be designed to meet the needs of the occupancy, efficiency of pickup, and shall be available to occupants and haulers. The guts of 510-50-009 has been code since 1-9-9-2. I agree it's been hit or miss on applying 51-50-009, depending largely on an individual in a given county or city taking the reins. Ron in Thurston County/Olympia would be another good resource on this.

### vii. Fund state-wide and local education campaigns

## Input: Fund statewide and local education campaigns

- Sean K.: Ties back to standardizing acceptable vs. unacceptable materials. To maximize taxpayer money to fund this, would want to have uniform communication.
- Kate K.: Regarding funding state-wide and local ed campaigns: yes please.

**b. Schools:**

- i. Recess before lunch**
- ii. 20-minute seated lunch**
- iii. Significant increase in grants (Healthy schools) to schools through existing program**

**Input: Schools (Recess before lunch; 20-minute seated lunch; significant increase in grants (Healthy Schools) to schools through existing programs; All new schools need infrastructure built into their design**

- Kate K.: Please clarify which grants you are referring to? We had thought the grants were those from OSPI: <https://ospi.k12.wa.us/policy-funding/school-buildings-facilities/grants-funding-resources-non-scip/healthy-kids-healthy-schools-grants>. Would like link to Ecology grants. Yes, City of Seattle is in support of recess before lunch and 20-minute seated lunch. There would also be a way for schools in old buildings not set up for the number of kids to make it work – would need an exemption for those.
  - Heather T.: Yes, talking about the one Ecology manages.
  - Chery S.: [Waste Not Washington School Awards](#). Lauren DiRe ([lauren.dire@ecy.wa.gov](mailto:lauren.dire@ecy.wa.gov)) is the contact.
- Alex T.: Question about applicability of grants. To your question posed earlier about banning compostable products, schools are a great highly-controlled experiment to test them. If you remove non-compostable counterparts, this would be a good place to test/study.
  - Heather T.: Re: school size. Rina shared example of a school where they stagger the schools coming in and have been doing it for years to get that 20-minute seated lunch and to allow the staff to have time between each pulse of kids coming in. This staggering has allowed them to make it work better for the 20-minute lunches.
- Alli K.: Want to reiterate the point that these policies were all recommendations in the Use Food Well Washington plan and are included in the law that established Use Food Well. The grants you're referencing is the [Waste Not Washington grants](#). It has an annual budget of \$100,000 and individual grants go up to \$5,000.
- Rebecca F.: It sounds great to say that everyone's going to have recess before lunch. When you're running lunch from 10-1pm, you don't have that flexibility. When you're having lunch, you're also kicking people out into PE early. There are space constraints that might make this impossible to accomplish.

- Aaron C.: In 2019, Rep Thai sponsored a bill concerning lunch durations. DNP but a pilot study was funded and conducted.
- Rodd P.: Districts interested in talking to a coordinator who has managed a sizeable district-wide organics program, contact Mark Peterson at Bellingham Schools, 360-676-6400. The district has had organics collection and composting for ten years - they know what works and doesn't. Mark Peterson at the Bellingham Schools also has tons of data on savings from green practices, some related to organics: electricity and natural gas use, water usage, kitchen and custodial labor, waste disposal, etc. Our F+ collection program was started in the Bellingham schools in 2006, and quickly spread to included Whatcom Community College, Bellingham Technical College, and Western WA University, all programs in operation ever since. We don't have time or money to reinvent the wheel – let's all learn from programs in place for many years. Below in February in 2006: Larrabee Elementary, Bellingham, F+ Pilot – does that set-up look familiar? Pour milk out, recycle, toss any trash, the rest is compostable, leave your empty tray on the cart.



- Carl S.: It feels like we need more input from the school administration folks about this. The logistical issues that Kate referenced are likely replicated across many districts.
- Wendy W.: We should probably engage school districts, administrators and teacher unions before suggesting schedule changes.
- Jody S.: This seems like a great discussion to have with the educators. Have you had any conversations with WEA or anyone like that?

- Heather T.: This will be discussed further in the food workgroup and we did invite educators, and will invite more.

VI. Next Steps and Adjourn (1:55-2:00)

- a. Next meeting: **Wednesday, 11/15, 12-2pm**