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U.S. Environmental Protection Agency
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REF: Docket Number EPA-HQ-OLEM-2022-0415 (Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics)

The Solid Waste Association of North America (SWANA) appreciates the opportunity to submit comments on the Draft ***National Strategy for Reducing Food Loss and Waste and Recycling Organics*** (herein referred to as “the National Strategy”), which was released by the US Environmental Protection Agency (EPA), US Department of Agriculture (USDA), and US Food and Drug Administration (FDA).

SWANA is an organization of 10,000 public and private sector professionals committed to advancing from solid waste management to resource management through a shared emphasis on education, advocacy and research. Our members also include non-profits, universities, students, and other sectors. SWANA’s Young Professionals group is engaging the next generation of the resource management workforce. SWANA’s comments on the National Strategy have been prepared with the input of public and private solid waste industry professionals from across North America.

SWANA supports the efforts of the EPA, USDA and FDA to prevent food loss and waste and to support the recycling of food and organic waste. These efforts will advance the progress of the United States in meeting the *National Food Loss and Waste Reduction Goal* and the National Recycling Goal. National collaboration and leadership are necessary to create a more comprehensive, resilient, and cost-effective organic waste recycling system.

As the finalization and implementation of the National Strategy progresses, SWANA requests that the EPA engage SWANA in the next steps. SWANA’s members include the professionals who are designing, building, and operating organics recycling systems (including composting, anaerobic digestion, and other technologies); managing collections of organics; designing and implementing communications; marketing end products; and providing other essential functions that will be key to the implementation of the National Strategy.

The comments in this document are organized by the headings used in the National Strategy, which are distinguished by bold and italicized text. While SWANA supports many of the strategic actions described in the National Strategy, our comments focus on the priority areas for SWANA, including recommendations for additional information and actions to include in the National Strategy.

Objective 1. Prevent food loss where possible.

Strategic actions

B. Reduce food loss in food manufacturing/processing, storage and distribution.

Data provides insight into where and when food loss is occurring, as well as the types of material lost. Federal funding for implementing waste audits and waste data tracking would support the understanding of how and where loss is occurring and how to address it.

The haulers and processors of both general waste and source-separated organic waste from food manufacturers, processors, and distributors are well positioned to collect data and insights on food loss for their clients. SWANA encourages the involvement of haulers and processors in the collection of data and insights on food loss.

Objective 2. Prevent food waste where possible.

Strategic actions

A. Develop, launch and run a national consumer education and behavior change campaign.

SWANA supports the need for food waste prevention, which can result in lower carbon footprints and many other benefits. A national consumer education and behavior change campaign with consistent messaging has great potential to support consumers with food waste prevention.

Members of SWANA include professionals who manage residential outreach and education on waste reduction and management. SWANA encourages the EPA to involve and welcome the feedback of these professionals who have first-hand experience into what approaches have been most effective when engaging residents. There are lessons to be learned from campaigns that have previously been launched at the local and state levels.

As with food loss, data can provide insight into where and when food waste is occurring, and what type of material is being wasted. This data can inform how to design an effective national campaign and where to focus efforts. The collectors and processors of both general waste and of organics for the residential sector are well positioned to have insights and data on recycling rates of organic materials. SWANA encourages involvement of local government and the haulers and operators in this strategic action. Funding for conducting waste audits and waste data tracking will support the understanding of how and where waste is occurring and how to best target an education and behavior change campaign.

Consumer education should include information about “sell by,” “best by,” and “use by dates,” as these are often confusing and misunderstood by consumers, leading to unnecessary waste. The USDA website states, “Confusion over the meaning of dates applied to food products can result in consumers discarding wholesome food¹.” While the USDA and other agencies and organizations share information on understanding date labeling, more could be done to help consumers understand the meanings to prevent food waste.

¹USDA Food Safety and Inspection Service, “Food Product Dating” <https://www.fsis.usda.gov/food-safety/safe-food-handling-and-preparation/food-safety-basics/food-product-dating>

B. Educate children and youth about strategies to reduce food waste; encourage development and adoption of lifelong best practices in schools to reduce food waste.

SWANA supports this strategic action. Educating youth about reducing food waste reduction should be part of a larger education effort on the importance of recycling, preventing litter, and generally practicing responsible waste management.

C. Partner with the private sector to find upstream solutions to consumer food waste.

SWANA supports this strategic action and recommends that the National Strategy also recognize the challenge of food waste that results from the impacts of floods, fires, and prolonged power outages. After a disaster or power outage, large food service businesses and organizations may dispose of all food as a technique to manage risk and liability. While there may be opportunities for donation of edible items and recycling of inedible items, it may be too time-consuming, difficult, or undesirable to sort materials in these post-disaster circumstances. Partnering with the private sector to find solutions in these situations is also important, especially as extreme weather conditions become more frequent.

H. Participate in international forums to share best practices, data and tools.

SWANA supports this strategic action. As a member of the International Solid Waste Association (ISWA), SWANA recognizes the benefits of international collaboration, and the lessons to be learned from other countries that have implemented organics recycling.

Objective 3. Increase the recycling rate for all organic waste.

Strategic actions

A. Support the development of additional organics recycling infrastructure through grants and other assistance for all communities, especially those that are underserved.

SWANA supports this strategic action. The USDA and EPA funding mechanisms described in this section are important. For example, the Solid Waste Infrastructure for Recycling Grant Program (SWIFR) will enable the grant selectees, which include SWANA members, to progress on organics recycling infrastructure projects. Grant funding will be needed beyond the SWIFR funding, which is scheduled to end in Fiscal Year 2026. SWANA urges the National Strategy to consider how to expand funding into the future, which will be key to successful growth of organics recycling.

Grants can be complemented by other economic incentives. In some regions, low tipping fees may make it difficult for organics infrastructure to create a sustainable business model. Financial support for organics infrastructure may be necessary to support the establishment of this infrastructure in these cases. Additional support and financial incentives, such as tax credits, for developers of Renewable Natural Gas (RNG) and Landfill Gas to Energy (LFGTE) projects will also be key to growing organics recycling.

In addition to the EPA, USDA, and FDA, other government agencies such as the Department of the Treasury, Department of Commerce, and Department of Energy will play a role in implementing these strategic actions. SWANA recommends that the role of these other agencies and of interagency coordination be acknowledged in the National Strategy.

B. Expand the market for products made from recycled organic waste.

Creating long-term demand for materials made from recycled organic waste will support the creation of the material. This action should consider a range of incentives for using compost and biogas created from organic materials. Actions to drive demand may include tax incentives, rebates, grants, and education on the benefits of the materials. The compost produced from recycled organic waste can improve soil health and improve stormwater remediation, while the biogas can support the transition to renewable energy, which are important goals for a changing climate.

SWANA recommends encouraging the private sector to utilize the power and heat created from anaerobic digestion, particularly those that have organic material they are sending to the facility, providing the opportunity to create a full circle of reuse.

Government agencies have great purchasing power and can drive the demand for products made from recycled organic waste which would also have the benefit of setting an example for the private sector. This strategic action should consider the development of procurement guidance for federal agencies to prioritize the use of products made from recycled organics, which could also serve as a model for state and local public agencies. For example, state departments of transportation have purchasing power and would benefit from the use of compost. Many organizations and government agencies have compost procurement guidelines that can serve as models for others and be referenced as resources in the draft strategy. An interagency government campaign to encourage the use of the materials could have significant impact.

In addition, there may be lessons learned from efforts to expand the market for recyclables. SWANA recommends reviewing the progress of the *National Recycling Strategy* and the success of recent campaigns, initiatives, and incentives to buy recycled content.

C. Enhance support to advance de-centralized (i.e., community-scale and home composting) organics recycling, with emphasis on Tribal communities and communities with environmental justice concerns, allowing all communities to benefit—economically and environmentally—from certain types of organics recycling efforts.

For this strategic action to be successful, it will be important to provide resources for training and best practices, and educational materials for local government staff, elected officials, and communities. There are many successful models of community-based and home composting. For a program to be successful, it must be prepared to overcome barriers, such as communities' perceptions of composting creating odor and attracting rodents and other vectors, which can occur if the infrastructure or operations are not adequate. In addition, local zoning and housing ordinances and regulations are not always supportive of community or backyard composting. Guidance on structuring local zoning and housing laws to allow community composting would support this strategic action.

Small-scale anaerobic digestion also presents high potential for de-centralized organics recycling. These facilities can decrease the need to transport materials long distances, can provide local energy, and have other local benefits.

D. Build, refine, and share tools and data to aid decision-making about infrastructure investments, waste management policies, and waste management pathway destinations (e.g., composting, anaerobic digestion, landfill).

Life cycle analysis is an important tool in evaluating energy use, environmental emissions and cost of waste management practices. SWANA supports including a description on the role and importance of these tools.

In addition to the other tools listed in this section, it should recognize EPA's Waste Reduction Model (WARM) which provides comparative data on materials management practices. WARM Version 16 was published in December 2023 and has a role in supporting decision making.

The shift to the collection of source-separated organics is a major undertaking, which may require changes to collection routes and collection schedules, the distribution of new collection containers, and the changing of fee structures or funding models. This strategic action should include the recognition of tools used for decision making related to collections.

SWANA recommends that the National Strategy recognize that there is not a "one size fits all solution;" each community will have unique needs and will need to determine the approaches to organics recycling that work best for them. This will require a menu of options for organics recycling methods and technologies, and a combination of decentralized and centralized models. The National Strategy should explain that a range of approaches for collection and processing may be needed depending on the source of materials, the location specifics, the population, the climate, the end markets, and other factors that may vary location to location.

E. Address contamination in the organic waste recycling stream.

The challenge of contamination cannot be underestimated. Contamination in source-separated organics makes it more challenging and expensive to produce a quality compost as an end product. The aesthetics and the chemical characteristics can both be challenged by contamination.

Many compost facilities have invested in screeners and other equipment designed to separate non-organic material from the desired organic material. When there are high levels of contamination, even this equipment is not always sufficient to remove all the non-organic material, resulting in a compost end product that contains bits of plastics and other materials that are undesirable in compost. There are limited options for end uses of material that does not meet standards for use in agriculture or soil enrichment.

In addition, per-and polyfluoroalkyl substances (PFAS) are an area of concern. While this section states that "EPA and USDA will support research on the uptake and bioaccumulation of PFAS in plants and animals, including PFAS bioaccumulation via biosolids application," (page 20), it should further discuss how the EPA and USDA will work to mitigate these risks. There are increasing restrictions on the land application of biosolids that contain PFAS, limiting the options for this organic material. In order to prevent something similar from happening with compost, the allowance for PFAS in compostable packaging and service ware need to be considered.

Strong standards for labeling and design for “compostable” and “biodegradable” packaging and food service ware are needed. Consumers are often confused about which materials can be composted. While some materials may be accepted in industrial compost facilities, they are not accepted in smaller scale facilities, including home composting and community composting. Packaging and service ware that is labeled as “biodegradable” and “compostable” may not always be proven to be biodegradable or compostable or may only be so in certain conditions which do not exist locally. Grants for field testing materials and stricter standards on labeling may also help mitigate these issues.

In addition, adhesive labels (stickers) on produce are a persistent source of contamination and a nuisance to composting operations.

At both the residential and business level, unaccepted materials are disposed of with the organics, creating contamination challenges. As the United States seeks to increase organics recycling, efforts to reduce contamination need to be an integral part of strategy and implementation.

There are lessons to be learned from single stream recycling on the challenges and consequences of contamination, as well as potential solutions. The adoption of single stream recycling for household recyclables resulted in higher participation in recycling, but it also resulted in high levels of contamination. Contamination resulted in losing end markets for the materials. The EPA’s National Recycling Strategy states that “contamination can result in material value escaping from the economy” (page 12) and the same principle applies to organics.

There are now massive education and outreach efforts underway to address contamination in the recycling stream. Public and private owners of Material Recovery Facilities (MRFs) have needed to invest in additional measures to sort unaccepted materials out of contaminated recycling. These investments have included advanced technologies, additional sorting equipment, and employees to pull out contamination.

It would be counterproductive to invest large amounts of monetary and human resources into establishing organics recycling if efforts are not simultaneously made to prevent contamination. The creation of quality compost will require strong education and outreach efforts from the start, accompanied by controls around what type of material is accepted, how packaging materials are labeled, and other supporting policies.

Objective 4. Support policies that incentivize and encourage food loss and waste prevention and organics recycling.

Strategic actions

A. Support international policymakers aiming to build more circular economies.

SWANA supports this strategic action. As an organization that represents North America, and as a member of ISWA, SWANA recognizes the benefits of international collaboration.

B. Support Tribal, territory, state, and local policymakers aiming to build more circular economies.

SWANA supports this strategic action. SWANA provides resources to our members, which include many public sector officials. We welcome the opportunity to be involved in this strategic action.

Additional Comments

Job Creation and Workforce Support

The National Strategy should stress the importance of job creation and the positive economic impact of organics recycling. As the collections and processing of organics increases, there will be a growth of jobs in this field. Training programs and composter certification will be important in preparing and qualifying this workforce.

As jobs in this field grow, the need for employee safety will also grow. The National Strategy should include strategic actions to support employee safety which can be achieved through supportive policies and the sharing of resources, training, and peer learning.

SWANA supports the recognition of the importance of environmental justice and equity. The strategy is focused on equity in communities, but this also needs to be connected to those working in the industry and job creation in this sector.

SWANA's Technical Policy 7², "Organics Management as Part of Integrated Solid Waste Management" provides additional descriptions and guidelines that should be considered as a resource.

Conclusion

As the finalization and implementation of the National Strategy progresses, SWANA requests that the EPA, USDA, and FDA continue to provide opportunities for engagement and input of SWANA, as our members have first-hand experience on organics recycling systems from throughout North America. For organics recycling to be successful now and into the future, it is important to support the entire system, from design and labeling of materials, through collection and processing, to support for creating viable end products with market demand.

SWANA congratulates the EPA, USDA, and FDA on releasing the draft *National Strategy for Reducing Food Loss and Waste and Recycling Organics*. Thank you for considering SWANA's comments. If you have any questions about these comments, please contact the undersigned at koldendorf@swana.org.

Sincerely,



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²SWANA Website, <https://swana.org/advocacy/technical-management-policies/docs/default-source/advocacy-documents/technical-policies-library/t-7---organics-management-as-part-of-iswm>