



Environmental Council of the States

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February 2, 2024

Ms. Carolyn Hoskinson
Director, Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Docket ID No. EPA-HQ-OLEM-2022-0415

Re: Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics

Dear Ms. Hoskinson,

On behalf of the Environmental Council of the States (ECOS), the national nonprofit, nonpartisan association of state and territorial environmental agency leaders, we appreciate the opportunity to comment on the *Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics* (“draft Strategy”). As states work to reduce food loss and waste, ECOS members welcome this collaboration with EPA, USDA, DOE, and FDA as an opportunity to expand coordination among states and federal agencies across the United States government.

State environmental agencies are working to promote a more circular economy, and the draft Strategy emphasizes the Administration’s commitment to advancing these priorities. Since 2010, ECOS members have emphasized the importance of sustainable materials management and life-cycle approaches pursuant to [ECOS Resolution 10-1](#). Addressing environmental challenges such as food loss and waste requires customized solutions in each state, as definitions and planning procedures vary based on individual state situations and needs. ECOS appreciates the draft Strategy’s commitment to seek input from state and territorial governments to help build a more circular economy for all. Consistent regional and national coordination and peer sharing networks outlined in the strategy will bolster implementation efforts in states.

States look forward to ongoing engagement with EPA, USDA, DOE, and FDA following the release of the Strategy. The programs and partnerships proposed in the draft Strategy will achieve goals shared by both states and the Administration. Working to address food loss and waste will help reduce greenhouse gas emissions, helping states reach ambitious climate goals. Furthermore, landfill diversion techniques like improvements to organics recycling and reuse will facilitate improved management of landfill space across the country. Many states struggle with capacity limitations at landfills and wish to avoid expanding existing facilities, especially those in and around communities facing environmental justice concerns. As such, states are eager to engage in efforts to divert waste from landfills, and we urge EPA, USDA, and FDA to leverage state expertise in accomplishing this goal.

ECOS members are enthusiastic about reducing food waste, and are already organizing their own programs. For instance, the Iowa Department of Natural Resources awards Food Storage Capacity Grants to food banks and nonprofits to reduce waste by expanding refrigeration and other storage options, and the Connecticut Department of Energy and Environmental Protection has launched a pilot program in

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which municipalities collect organic materials in color-coded bags for use as compost. The South Carolina Department of Health and Environmental Control co-sponsored a statewide campaign to increase awareness of the impacts of food waste among public and private sector partners, and the Washington Department of Ecology has created a food center hub aiming to connect individuals and organizations across the food system to divert food waste away from landfills. Many ECOS members have produced robust state Waste and Materials Characterization Reports that address organics management and opportunities for improvement, among other efforts that support the goals of the draft Strategy. We hope that EPA, USDA, and FDA can learn from and build on these existing state efforts going forward.

As PFAS and other persistent chemical contaminants become recognized as emerging concerns for organic waste streams, states are committed to the regulatory partnerships needed to better address this challenge. ECOS has prioritized PFAS in its advocacy and programming, and is interested in coordinating further with federal agencies on this topic.

Recognizing that many states are resource-challenged, ECOS greatly appreciates focused federal resources that help states accomplish the goals of the draft Strategy. All 50 states have expressed interest in EPA's Solid Waste Infrastructure for Recycling (SWIFR) and Consumer Recycling Education and Outreach (REO) Grant Programs, and are eager to engage further. These programs will allow state agencies to build capacity to ensure states have the resources to act as effective co-regulators with their federal partners. States also hope to engage in additional information sharing within ECOS and in partnerships with federal agencies, creating meaningful metrics to collaborate on food loss and waste measurements and data.

Thank you for your continued support of programs that reduce food loss and waste and improve organics recycling, both at the state and national levels. We look forward to your continued engagement with states on this work. As a next step, we are eager to further pursue opportunities for collaboration through the ECOS Land & Materials Committee and the ECOS Sustainable Materials Management Workgroup. Please don't hesitate to contact me if you have any questions or suggestions, and thank you for your consideration of our input.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Grumbles". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ben Grumbles