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Acting Designated Federal Officer, EPA

January 5, 2021

The Honorable Andrew R. Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Wheeler:

The Local Government Advisory Committee (LGAC) appreciates the opportunity to provide input on the sustainable management of food from the local government perspective.

We commend the EPA for making the reduction of food waste and loss a priority, and we recognize the value of the agency's array of programs and efforts including the Food Recovery Challenge, Excess Food Opportunities Map, and the Food Waste Assessment Guidebook. Many of the LGAC members are proud signatories of the Winning on Reducing Food Waste State, Local, Tribal, and Territorial Pledge.

To be successful with the agency's sustainable food management efforts and help develop new programs, the Office of Land and Emergency Management (OLEM) recognizes the importance of understanding what local communities need to effectively manage food waste, both in terms of helping provide for needy people and protecting the environment by composting. We therefore appreciated OLEM's request to share our insights on these issues. Since one size doesn't fit all for food waste management programs, OLEM is seeking to learn about specific local examples of what's working to provide it with a basic structure of successful elements that could be valuable to all communities.

The LGAC's charge was to offer input and feedback to the EPA on the following questions:

- 1) How can states/local governments build networks to withstand food system disruptions (such as those experienced with COVID-19), and build future resilience?
- 2) What are the effects of policy/bans to reduce food and organics from landfills? What is working? How are you measuring results?
- 3) How can states/local governments efficiently share best practices to reduce food loss and waste?
- 4) What are current effective interventions states/local governments are using the reduce food waste?
- 5) What are the research needs of states/local governments to reduce food waste?

6) If funds/resources were not an issue – what efforts would local governments want to implement to reduce food waste?

To help answer these questions, the LGAC offers the following recommendations and local examples:

Local Examples

The following examples of programs and efforts from the localities of LGAC members include activities such as grants for local businesses, conversion of commercial cooking oil to biofuel, donations of casino food waste to needy populations, distribution of food waste to local farms, and collaborations with food banks.

- 1) Ramsey County, MN, has a partnership with a neighboring county on food waste related to the local waste-to-energy plant. The grant program, called BizRecycling, offers up to \$10,000 for businesses that covers startup costs for food waste programs. However, during the COVID-19 pandemic the county is seeing less food waste from restaurants and more household food waste being produced. As a result, the county's waste-to-energy plant is processing more food waste, which leads to lower energy output from the plant. Ramsey County also has a program for processing and giving food waste to pig farmers.
- 2) In southern Maine there is a very successful [Garbage to Garden Program](#), which is a curbside pickup program for food waste and cooking oil that is used by local farms. This has helped to preserve space in the local landfills.
- 3) Catawba County, NC, runs a successful program for the recycling of cooking oil at the county's landfill. There is a biofuel plant run by a private company, and the biofuel is used for the county's school buses. This has helped to reduce food waste from local restaurants.
- 4) The St. Regis Mohawk Nation in New York runs a food waste composting program at its casino.
- 5) Dane County, WI, developed a food systems recovery guide and educational magnets to help educate the public. The county also has pilot programs for small scale food recovery efforts.
- 6) The Missouri Department of Economic Development has a Neighborhood Assistance Program (NAP) that provides state tax credits (50% credit) for the value of donated food products.
- 7) A food bank located in St. Joseph, MO, has a challenge related to food spoilage, due to the amount of produce it sources and limitations with refrigerated storage capacity. They try to monitor and track the amount of spoilage that occurs. The food bank works with local retailers to discourage donations of undesirable product, as it then becomes a challenge for the bank to manage. In general, to quickly distribute to families in need, food banks work tirelessly with retailers to collect their perishable products with a short remaining shelf life. Although this kind of model can have challenges, it has a history of working for food banks.

Recommendations

- 1) The LGAC recommends that the EPA consider ways to incentivize sustainable food management through mechanisms such as allowing local, tribal, and territorial governments, and other entities, such as the hospitality industry, to receive credit for meeting federal regulations by advancing food waste minimization and reuse programs in their communities.

- 2) Given the success of grants provided by the EPA, the LGAC recommends the agency use the Committee’s recommendations provided in this letter as leverage for developing more food waste grant programs.
- 3) Understanding best practices and successful models for managing food waste is an essential way for local, tribal, and territorial governments to develop their own successful programs. The EPA plays a key role in this regard. The LGAC therefore recommends that the agency collect and disseminate information on a regular basis about local success stories and best practices for reducing food waste. There are multiple ways that these best practices could be shared, such as included in an EPA-developed toolkit and disseminated through existing state and regional recycling networks.
- 4) The LGAC recommends that the EPA work with tribal governments to develop college curricula to help students learn about sustainable food management. The students could then conduct broader education within the community and partner with tribal elders on sharing knowledge. Also, EPA grants for tribal college students to conduct food waste audits at local businesses would help teach job skills.
- 5) Communities must first develop the necessary infrastructure, facilities, and programs to handle food waste before an ambitious food waste policy can be established. In general, communities do not have the funding or staff capacity to study the feasibility of developing these. Therefore, the LGAC recommends that the EPA provide grants for feasibility studies to help communities build food waste diversion programs. In addition, support from the EPA for pilot projects to test the effects of local bans/policies would help raise the confidence of local, tribal, and territorial governments for committing to such bans/policies.
- 6) The LGAC recommends that the EPA help communities understand the potential costs and benefits of a food waste recovery program. This should include the ability to estimate the long-term costs of building and maintaining food waste recovery facilities and infrastructure. Economic analyses such as these can influence the creation of local food waste policies. In addition, tools for retailers to analyze potential avoided disposal fees would help to encourage them to donate excess food. Finally, to help food banks manage food product donations that are no longer feasible to distribute (e.g., supply often exceeds distribution capacity), tools and resources are needed to help them analyze the economic feasibility of composting the excess.
- 7) An important concern for many localities, particularly in small communities and on tribal lands, is how to address the lack of food systems in rural areas. In the case of Missouri, for example, most of the food production facilities that manufacture and process food for consumption are located in the larger cities where the workforce exists. The LGAC recommends that the EPA explore ways to help communities identify best practices for creating localized food systems.
- 8) The LGAC recommends that the EPA develop toolkits that are research and evidence based.
- 9) The LGAC recommends that the EPA assist state, local, tribal, and territorial governments to establish their own boards of food system experts that would develop food system plans and policy proposals. Such boards would establish relationships and build networks to better address local and regional food system challenges, including waste, food security, and resilience from natural and man-made disasters.
- 10) Many communities do not have the luxury of developing public education campaigns on food waste management. Therefore, support from the EPA as far as templates for informational

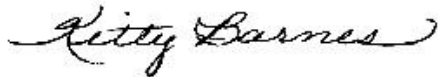
materials, shareable graphics, best practices, etc. would be valuable. In addition, having access to EPA funding for public education campaigns is also critical, particularly for small communities.

In summary, the LGAC recommends that the EPA produce the following resources and tools to help local, tribal, and territorial governments develop successful food waste diversion efforts:

- Toolkits
- Specialized curricula for tribal colleges
- Regulatory credits
- Cost-benefit analytical tools
- Support for pilot projects for food waste disposal bans
- Grants for feasibility studies and waste audits
- Networking opportunities
- Resources specifically targeted at rural areas
- Guidance and financial support for food banks

Thank you again for the opportunity to provide advice and recommendations on the important issue of reducing food waste and loss in the United States and tribal nations.

Sincerely,



Commissioner Kitty Barnes
Chair, LGAC



Commissioner Victoria Reinhardt
Chair, Revitalizing Communities Workgroup



Administrator Brian Fulton
Chair, Small Communities Advisory Subcommittee (SCAS)