



February 2, 2024

Carolyn Hoskinson
Director, Office of Resource Conservation and Recovery
Office of Land and Emergency Management (5306T)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

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

Submitted online via www.regulations.gov

Dear Ms. Hoskinson:

The Food and Agriculture Climate Alliance (FACA) appreciates the opportunity to offer comments on the Environmental Protection Agency (EPA), United States Department of Agriculture (USDA), and Food and Drug Administration's (FDA) *Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics*.

FACA was founded in 2020 to ensure that stakeholders across the agriculture and forestry value chain have a seat at the table in federal climate policy discussions. Today, FACA has over 80 members representing farmers, ranchers, forest owners, agribusinesses, manufacturers, the food and innovation sector, state governments, sportsmen and sportswomen, and environmental advocates. Our members are united in support of federal climate policies that:

1. Are voluntary, market- and incentive-based.
2. Advance science-based outcomes.
3. Promote resilience and help rural economies better adapt to climate change.
4. Ensure equitable opportunities for all farmers, ranchers, and forest owners, including historically underserved and small producers.
5. Are strongly bipartisan.

For a list of FACA members, please visit www.agclimatealliance.com.

FACA is in a unique position to aid the agencies with implementation of the National Strategy.

The Food and Agriculture Climate Alliance commends the agencies for developing a comprehensive national strategy to address food loss and waste throughout the entire supply chain, including at the consumer level.¹ The collaborative, systems-based approach outlined in

¹ EPA, USDA, FDA, *Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics*, December 2023. Hereafter referred to as the National Strategy.



the document recognizes that reducing food loss and waste will contribute to achieving the United States' larger climate goals, as well as offering significant benefits towards improving food donation and other hunger-related programs. FACA has taken a similar approach in our work on food loss and waste. In our founding 2020 policy document, our food waste efforts were designed to, “leverage achievable goals and metrics to reduce and mitigate food loss and waste, and thus, positively impact feeding people and addressing climate change.”²

The broad and diverse structure of FACA – which includes representatives from every stage of the agriculture and food supply chain, as well as NGOs – places the coalition and its members in a unique position to aid the agencies in the implementation of the National Strategy. Our focus on science-based outcomes and creating equitable opportunities for all members of the supply chain without the imposition of new costs or burdens lines up with the strategy's outlined goal of developing “powerful strategies to reduce the environmental impact of feeding a rapidly growing global population while potentially improving the economic security of producers...and providing resources for new types of businesses and jobs.”³ FACA encourages USDA, EPA, and FDA to engage in outreach with our coalition and work with our members to develop a roadmap for collaboration that will benefit businesses, consumers, underserved communities and civil society. Leveraging the unique perspective our members bring to the table can focus a significant layer of non-governmental resources on addressing the problem of food loss and waste.

FACA is supportive of the goals laid out in the National Strategy, which can enhance many of our own efforts.

In the four years since its founding, FACA has produced a number of policy recommendations that have close corollaries in the approach laid out in the National Strategy. The agencies' framework for addressing food loss and waste at a national level is a thoughtful and well-laid out approach of which our organization is very supportive.

Among the areas where there is a shared set of policy approaches are:

- *Facilitating food donations to improve access to healthy and affordable food* – FACA's policy approach has called for the expansion of food donations from across the entire supply chain, along with the development of better measurement tools and metrics to capture these increases.⁴
- *Incorporating loss-reducing technologies at every stage of the supply chain* – FACA recognizes that building capacity and deploying new technologies to address food loss

² Food and Agriculture Climate Alliance, *Joint Policy Recommendations*, December 2020, pp.38. Available online [here](#).

³ *National Strategy*, pp.6.

⁴ *Joint Policy Recommendations*, pp. 38.



and waste throughout the entire supply chain presents exciting new opportunities, while also posing challenges around cost and technical feasibility. As a result, the organization has previously called on USDA to, “[i]dentify grant and funding opportunities for the scale-up of technologies (such as dehydration, stabilization, an improvement of cold chain efficiency) for reducing loss and waste of foods while keeping products in the human food supply chain.”⁵

- *Funding packaging alternatives to extend shelf life and reduce food loss* – Packaging can play an important, and often misunderstood, role in extending shelf-life for fresh products. FACA has encouraged research into and the deployment of new packaging technologies throughout the entire supply chain, with a particular focus on materials that can be used at field-level or in packing houses to reduce shrink during the transportation and storage process.

This list is by no means comprehensive but reflects three significant areas of shared focus between FACA’s efforts and the work laid out in the National Strategy. There are a number of other efforts that complement each other, and we would, again, urge the three agencies to collaborate with our organization to develop opportunities for expanding and coordinating efforts to maximize impact.

FACA encourages the agencies to implement the National Strategy in a way that reflects the full breadth and diversity of the agricultural and food supply chain.

While FACA is supportive of the National Strategy, we would urge the agencies to pursue its implementation in a way that reflects the full spectrum of producers in the supply chain and recognizes that each is in a unique position. FACA’s guiding principles state that efforts to address climate change should be voluntary, market- and incentive-based, and rooted in science; part of complying with these principles is recognizing that there is a broad-variation in the deployment of current technologies and that the marketplace has room for multiple production systems.

For example, the agencies should work to ensure that often overlooked aspects of the supply chain – such as animal rendering – are included in outreach and engagement efforts. Renderers divert a significant amount of raw material from landfill and upcycle it into higher valued use ingredients. Without rendering, our food production footprint would be much higher since roughly 50% of an animal carcass is inedible.

The same holds true for variations in technology. Biotechnology is a critical tool in breeding to enhance the efficiency and efficacy of agriculture through improvements in genetics. Modern breeding tools offer breakthroughs for extending shelf-life, enhancing quality, safety, and

⁵ Food and Agriculture Climate Alliance, *Farm Bill Policy Priorities: Food Waste*, 2023, pp. 3. Available online [here](#).



resilience as well as breeding for traits desirable by consumers.⁶ Implementation of the National Strategy should facilitate the deployment of this important technology, while also recognizing that segments of the marketplace have made a decision not to pursue it. A technology-neutral approach should focus on continuous improvement of each segment of the marketplace without substituting government mandates for market forces.

Similarly, AI and other new technologies offer tremendous opportunities to collect better data and establish new practices but can also carry prohibitive costs. FACA encourages the agencies to tailor approaches that respect both old-line and new technologies and to be mindful of the possibility of unintended consequences that could shut certain parts of the supply chain out of these food loss and waste efforts.

FACA encourages the agencies to work cooperatively with stakeholders, including state departments of agriculture, in implementing educational campaigns that address consumers and producers in the supply chain.

FACA commends the agencies for addressing one of the most intransigent elements of addressing food loss and waste – the lack of consistent, fact-based consumer education. Consumers are inundated with information on a number of topics, ranging from nutrition to date labeling, which can create confusion around steps to reduce their food waste at home. One of our organization’s earliest food waste policy recommendations was for the, “develop[ment of] a public-private partnership for food waste education.”⁷ We have further encouraged USDA to expand food waste education efforts in existing nutrition efforts such as E-SNAP.

FACA looks forward to working with the agencies to develop and implement this education campaign but would also encourage efforts to provide increased education opportunities within the supply chain. Supply chain participants are not exempt from the same information overload faced by consumers and need straightforward resources tailored to their specific operations. Improving the knowledge base of supply chain participants, particularly ones representing small producers and businesses, as well as underserved communities, will greatly enhance the overall effectiveness of the larger National Strategy. However, both education and follow-up capacity building need to move forward without imposing new costs or obligations on producers and retailers.

FACA is supportive of efforts to improve the metrics around the measurement of food loss and waste.

⁶ Ibid., pp 4.

⁷ *Joint Policy Recommendations*, pp. 38.



One of the most challenging aspects of understanding the full scope of food loss and waste in the United States is the lack of consistent data. There are a number of different definitions of food loss and waste in use, which creates its own challenges; but even when consistent language is employed, the actual process of measurement is still extremely challenging for virtually every aspect of the agriculture and food supply chain. To address these challenges, FACA is supportive of the agency's efforts to develop more reliable metrics for measuring food waste. Harmonization and education are very much needed if the issue of food loss and waste is to be effectively addressed.

However, we also urge the agencies to move forward with an approach that does not impose arduous reporting requirements or new costs without a subsequent return on investment for supply-chain participants. Most producers and retailers understand the importance of addressing food loss and waste in their operations and embrace a larger national effort that creates both economic and societal (such as increased food donations) benefits. It is unfair to expect these producers to take on new obligations or invest new capital in an already challenging marketplace. Efforts at addressing food waste should, therefore, focus on one of FACA's key principles – creating incentive-based opportunities for the supply chain to engage.

The National Strategy should leverage the unique role played by state and local authorities in the agriculture and food supply chain.

Finally, FACA encourages the agencies to remember that state and local governments are often closer and more engaged with agriculture and food producers in their localities than national authorities. These unique relationships and specialized knowledge sets are an important point of leverage that we encourage the agencies to focus on in education and outreach efforts to implement the National Strategy. State and local authorities can help to tailor approaches that reflect the “reality on the ground,” increasing the chances of successful processes being implemented. Efforts to address food loss and waste are going to require broad support to be successful and the unique position of state and local officials and organizations are an invaluable tool for helping achieve this buy-in.

Conclusion

FACA thanks USDA, EPA, and FDA for the thought and effort that went into the development of the National Strategy. The breadth of our membership – which takes an all-of-supply chain approach, including important NGO partners – presents unique opportunities to harness the systems approach presented in the National Strategy. We look forward to working together to help effectively implement the strategy.

Sincerely,
The Food and Agriculture Climate Alliance