

April 16, 2019

Greg Cooper
Division Director
Business Compliance and Recycling
Bureau of Air & Waste
Department of Environmental Protection
Commonwealth of Massachusetts
Boston Office
One Winter Street
Boston, MA 02108

Dear Mr. Cooper,

The undersigned organizations, which include composting, anaerobic digestion, food rescue, anti-hunger, agriculture, environmental, planning, and food system organizations, urge the Department of Environmental Protection of the Commonwealth of Massachusetts ("MassDEP") to amend the Commercial Food Material Disposal Ban 310 CMR 19.000 threshold for compliance from institutions that generate one ton of organic waste per week to those that produce half a ton per week. Decreasing this threshold would reduce food waste, divert more food waste from landfills and incinerators, and decrease greenhouse gas emissions. We urge MassDEP to begin the process to change this regulation immediately, prior to the drafting and promulgation of the 2020-2030 Solid Waste Master Plan.

In addition, we support increased enforcement of all of the waste bans defined in 310 CMR 19.00, particularly the food waste ban, through the hiring of additional inspectors and streamlined procedures.

Reducing food waste is a priority of the Massachusetts Local Food Action Plan, which was developed for and accepted by the Massachusetts Food Policy Council. One recommendation focuses on supporting the Food Waste Disposal Ban, including: "Explore expanding the statewide Commercial Food Waste Disposal Ban to phase in smaller food waste generators and residential food waste over time."

We look forward to discussing this matter with MassDEP staff at the April 17, 2019 Solid Waste Action Committee meeting. Thank you for your consideration.

Sincerely,

Conservation Law Foundation, Boston
Massachusetts Food System Collaborative, Greenfield

Black Earth Compost, LLC, Gloucester
Boston Area Gleaners, Waltham
CERO Cooperative, Boston
CISA (Community Involved in Sustaining Agriculture), South Deerfield
CommonWealth Kitchen, Boston
Environmental League of Massachusetts, Boston
Farm. Field. Sea., Vineyard Haven
Food For Free, Cambridge
Food Link, Inc., Arlington
Garbage to Garden, Saugus
Island Grown Initiative, Martha's Vineyard
Lovin' Spoonfuls, Boston
Metropolitan Area Planning Council, Boston
Perlmutter Associates, Cambridge
Spoiler Alert, Boston
The Greater Boston Food Bank, Boston
Vineyard Conservation Society, Vineyard Haven

clf

Conservation
Law Foundation



CISA
community
involved in sustaining
agriculture



Food Link
Rescue Food, Nourish Our Community

