December 6, 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 Massachusetts Food System Collaborative and the 25 undersigned organizations are pleased to provide these comments on the draft Massachusetts 2030 Solid Waste Master Plan.

The Commercial Food Waste Ban was one of the major successes that emerged from the 2010 - 2020 Solid Waste Master Plan. This Ban resulted in around $175 million in direct and indirect economic activity during its first two years and the amount of food waste diverted increased by over 150% over four years. We support the lowering of the threshold for compliance with the Commercial Food Waste Ban from one ton per week to half a ton per week; we would like to see this regulatory change implemented by fall of 2021. In addition we would like to see an inclusion in the Plan of a commitment to prohibit the disposal of all food waste from commercial sources by 2024 and from all sources by 2028.

Food waste source reduction is at the top of the hierarchy of preferred methods for reducing food waste, and it is critical that businesses and farmers are supported in adopting technologies to track and reduce their food waste generation. We would like to see the final plan offer such support.

The state should prioritize providing funding and technical assistance to businesses that are safely upcycling or repurposing food waste for human consumption. Because increasing the ban threshold will divert more food waste, ensuring sufficient demand for the projected increased supply of compost will help compost operators to remain financially viable. Agencies should help to build a larger customer base for compost operators through requiring that state and municipal landscape projects give preference to purchases of local compost over out of state sources.
Food rescue organizations collect nutritious food that would otherwise go to waste, and distribute it to people in need. The state should support this work through funding for infrastructure development and increased education for business owners about the benefits of food donation through explicit guidance from the Department of Public Health (DPH).

The state should also support municipalities in their efforts to design plans to reduce food waste in their communities. The plans should include outreach to residents about the importance of separating food waste and the options for diverting food waste in their community, including city-sponsored curbside compost pick up, commercial compost pick up, compost drop-off sites, and town-sponsored backyard compost bins. Municipalities, with the support from local boards of health and DPH, should also encourage composting and food rescue at schools.

Education and outreach to residents about the importance of separating food waste will help elevate the topic of food waste reduction and increase general awareness. We would like the Master Plan to include more explicit language about support for a statewide educational campaign.

Though there is sufficient capacity to process the current amount of food waste in the state, in part because of the high capacity of AD facilities, the facilities are not geographically accessible to all those who would like to divert food waste and may not take all types of food waste. We support increasing investment in local and regional composting capacity, small AD facilities, and intermediate processing facilities. The state will need to be creative about finding locations that would be suitable for composting -- municipal yard waste sites and state-owned land may be appropriate. Changing local zoning ordinances and continuing to provide technical assistance to compost operators may encourage more composting operations near population centers. Making the permitting process easier for food waste collection companies to leave food waste at transfer stations would also help.

The state should require that digestate materials from anaerobic digestion facilities at wastewater treatment facilities, including those that digest food waste, be regularly tested for additional contaminants, including PFAS, and that the state work with the agricultural community to create safe maximum contaminant levels for materials intended for agricultural use. There are concerns that this digestate, which is frequently land applied, may be contaminated and that spreading this material will contaminate the land, food and water. If this is the case, this is not the best use of food waste, a potentially valuable local source of soil amendments when kept separate from such contaminants.

Thank you for your consideration.

Sincerely,

Bedford Mothers Out Front, Bedford
Bill Emerson Food Donation Act Awareness Campaign, Bernardston
Black Earth Compost, Gloucester
Boston Area Gleaners, Waltham
Brewer's Crackers, Somerville
Central Mass Grown, Worcester
City Compost, Gardner
Community Involved in Sustaining Agriculture (CISA), South Deerfield
Eastie Farm Inc, Boston
Edible Boston, Wayland
Edible Worcester, Wayland
Food for All Technologies Inc, Boston
Food For Free, Cambridge
Food Link, Arlington
Green Andover, Andover
Hamilton Waste Reduction Committee, Hamilton
Island Grown Initiative, Vineyard Haven
Lexington Global Warming Action Coalition, Lexington
Mill City Grows, Lowell
Northeast Organic Farming Association/Massachusetts Chapter (NOFA/Mass), Barre
Rachel's Table, Springfield
Rescuing Leftover Cuisine, Boston
Spoiler Alert, Boston
Superfrau, Cambridge
The Greater Boston Food Bank, Boston