



July 6, 2021

Joint Committee on Environment, Natural Resources and Agriculture  
24 Beacon St.  
Room 218 and Room 473F  
Boston, MA 02133

RE: H963/S499 An Act regarding agricultural composting programs

Dear Chairs Rauch and Dykema, and members of the committee:

The Massachusetts Food System Collaborative is pleased to offer this testimony in response to H963/S499 An Act regarding agricultural composting programs.

We support the bills' establishment of an agricultural composting program under the control of the Department of Agricultural Resources (MDAR).

As written, however, these bills place significant burdens on under-resourced and overburdened local health departments, boards, and municipal agencies. For many years local boards of health have reported that they lack the staff, training and supports needed to expand from their existing responsibilities.

Further, placing control in the hands of local politics subjects farmers to regulations set based on personal grievances and non-science based opinion and determinations. This is contrary to the standards set by current laws and regulations for agriculture in the Commonwealth, and would be detrimental to achieving the state's goals for the food system set by the MA Local Food Action Plan, state goals and requirements for diverting food waste from landfills, and state goals related to climate change and lowering greenhouse gas emissions.

Proper composting and the development of proper composting regulations require a significant degree of professional, science-based knowledge and understanding. Municipal agencies, including boards of health, especially in rural locations, regularly report that they have neither the expertise nor capacity to promulgate or properly enforce complicated regulation outside of their expertise, nor to consider and weigh individual benefit verses the overall public benefit. Because of the complexity of proper composting and its impact on a number of state climate and food system related goals, **we urge the committee to consider the bill only if modified to reflect that the rules and regulations promulgated by MDAR supersede those at the local level.**

The Collaborative is a network of Massachusetts food system organizations, working to promote, monitor, and facilitate implementation of the Massachusetts Local Food Action Plan. The Plan

was developed for and accepted by the Massachusetts Food Policy Council, a 17-member entity comprising state agency, legislative, and industry representatives, established by the Legislature and Governor to develop recommendations, including legislative and regulatory changes, to promote sustainability, equity, and resilience in the Commonwealth's food system.

The Collaborative's 2020 report, *Massachusetts' Local Food System: Perspectives on Resilience and Recovery*, highlights the requirement of and public desire for legislation that uses systemic approaches to achieving the state's objectives and the maximum public benefit. We encourage you to consider this important perspective and strengthen these bills to reflect MDAR's necessary role in regulations and oversight of agricultural composting.

Thank you very much for the opportunity to provide this testimony.

Sincerely,

A handwritten signature in black ink, appearing to be 'Winton Pitcoff', with a long horizontal stroke extending to the right.

Winton Pitcoff  
Director