



CALIFORNIA DEPARTMENT OF
FOOD & AGRICULTURE

Karen Ross, Secretary

January 30, 2024

Ms. Carolyn Hoskin, Director
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency (28221T)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Via electronic submission to regulations.gov, Docket ID No. EPA-HQ-OLEM-2022-0415

Re: Comments on U.S. EPA's Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics - Inclusion of Rendering in the National Strategy and the Wasted Food Scale

To Whom it May Concern:

The California Department of Food and Agriculture (the Department) through the Meat, Poultry and Egg Safety Branch regulates Rendering in the State of California and recognizes the industry as a safe and environmentally sustainable component of reducing food waste and recycling infrastructure. California's laws and initiatives acknowledge rendering as a viable recycling pathway contributing to the aggressive organic waste landfill diversion goals established for the State. As such, the Department believes that specific inclusion of Rendering in the National Strategy for Reducing Food Loss and Waste and Recycling Organics (Strategy) is critical in aligning state and national initiatives and helping EPA achieve its target goals for food waste reduction and upcycling.

It is our understanding that as part of the draft Strategy, EPA will promote its new Wasted Food Scale (Scale), a tool that ranks wasted food management methods based on their environmental impacts and contribution to a circular economy. The tool's ranking is based on the findings of EPA's 2023 report "From Field to Bin: The Environmental Impacts of U.S. Food Waste Management Pathways", where 11 common pathways for managing wasted food in the United States were reviewed and assessed. We further understand that the new Scale updates the previously established U.S. EPA Food Recovery Hierarchy.

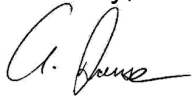


The Department is concerned that neither the draft Strategy nor the new Scale recognizes the critical role and key contribution rendering plays for agriculture, businesses, municipalities, and communities. Rendering has been an integral part of animal food recycling and biofuel production in California. The rendering technology is a well-established recycling method that ensures wasted animal food products are utilized for their best and highest use. As such, rendering plays a vital role in California's infrastructure and provides a critical path in minimizing waste and maximizing recycling, including diverting organic waste such as wasted food from landfills and reducing greenhouse gas emissions. Rendering facilities in California work together to protect animal agriculture and public health safety by using a technology that eliminates pathogens and makes maximum use of animal waste and byproducts.

The Rendering Industry Advisory Board (Board) for the State of California advises and makes recommendations to the Department on matters related to the industry. During the December 7, 2023 meeting, the Board echoed the Department's concern for the omission of rendering-specific recycling avenues. The draft Strategy and the new Scale, if not revised to highlight the vital role of rendering, would unjustifiably omit a critical sector that helps EPA and the State of California achieve the target goals of waste reduction and recycling.

The Department strongly recommends that U.S. EPA include rendering into the national Strategy and clearly reflect rendering in the revised Scale as a prioritized and higher ranked wasted food recycling pathway. This would not only recognize the vital role rendering plays in ensuring wasted food is upcycled to its highest and best value but would also help ensure consistency between state and national ranking order and help EPA achieve its target goals for food waste reduction and recycling.

Sincerely,



Annette Jones, D.V.M, Director

Animal Health and Food Safety Services Division