

February 2, 2024

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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:

International Fresh Produce Association (IFPA) appreciates the opportunity to submit comments on the Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics.

International Fresh Produce Association (IFPA) is a 501(c)(6) non-profit trade association representing the entire fresh produce supply chain. With >3,000 member companies, IFPA represents seed and fertilizer companies, grower/shippers, processors, distributors, food service, retail and quick serve restaurants. IFPA's strives to achieve a brighter future for all, and reducing food loss and waste, especially for fresh fruits, vegetables and floral is an important step toward achieving this brighter future for all.

International Fresh Produce Association (IFPA) agrees on the challenges identified in the Draft National Strategy: there is the need for outreach and education, the need to invest in fundamental research, the need for collaboration, removing obstacles facing underserved communities, addressing insufficient infrastructure and planning, expanding organics recycling market, as well as removing obstacles to estimating food loss and waste.

IFPA agrees that the *best strategy for reducing food loss and waste is to prevent* food loss and waste in the first place. In addition to the programs identified in the document, it is critical to include modern biotechnology and other bio-based inspired solutions for reducing food loss. We draw the attention of the agencies to the Special Issue of Current Opinions in Biotechnology <https://www.sciencedirect.com/journal/current-opinion-in-biotechnology/special-issue/10B9Z1CGV98>, which includes a compendium of peer-reviewed white papers on the opportunities for reducing food loss with biotechnology, gene editing, plant breeding, and other bio-based and bioinspired technologies. Modern technologies offer unique, environmentally friendly, cost-effective tools for reducing food loss and waste, and it is within the power of the agencies issuing this Draft National Strategy (namely, EPA and FDA) to remove any barriers that are keeping these technologies from their full usage and potential in addressing challenges

that face this Nation, including food loss and waste). Without removing these regulatory barriers to adoption, it is challenging to see how the work referenced in the draft strategy plan that the USDA ARS Produce Quality and New Uses program is tasked with conducting will find applications beyond the laboratory walls.

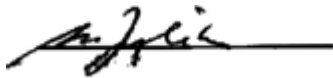
Below, IFPA offers some specific concerns with the published Draft in the order they appear in the Draft:

- (1) We express concern with designating the NIFA CFP program as the primary entity endowed with funds to develop programs for finding additional uses for excess foods. Our concern is that only “public food program service provider, a tribal organization, or a private nonprofit entity, including gleaners” are eligible for this funding, -- and these restrictions on eligibility risk long-term sustainability of food loss recovery programs. Hundreds of years of economic theory and practice have established that there is no substitute for market-driven programs, and only market-driven programs remain sustainable once short-term public investment is redirected. We urge the agencies to either expand eligibility for Community Food Projects to include for-profit entities, or to develop opportunities to engage for-profit organizations into food loss/waste recovery programs.
- (2) We applaud USDA for investing in research on modern biobased and renewable packaging. While these efforts are clearly important, reducing food loss and waste (including re-use and re-fill of packaging) will require re-thinking and re-imagining supply chains, including the “reverse supply chain” for packaging to be ~~re-used~~ re-used or re-filled. We urge USDA ERS to allocate resources, and to partner with private entities to use AI and other tools to map out the most economical opportunities for packaging re-use and re-fill.
- (3) We highlight the critical need for USDA, EPA and USDA, in conjunction with the industries and the civil society to begin a thoughtful process for developing guidance on packaging for food (including perishable foods). With our largest trading partners (Canada and EU) putting in place aggressive measures to eliminate plastics and/or single use packaging, and with similar efforts underway in states and municipalities of the United States, federal effort on packaging issues is critically needed.
- (4) We applaud efforts to reduce food waste and recognize efforts to develop consumer education campaigns. However, so far, the message of such programs “food for compost” is misguided. Food, especially highly nutritious foods, such as fresh fruits and vegetables, belongs on the plates of children, and not in compost piles. It is critical that the Blueprint for the National Campaign to Prevent Wasted Food is prescriptive, focusing on promoting consumption of nutritious foods (such as fruits and vegetables), and not directing fresh produce to compost.
- (5) We support an investment into NIFA FASLP program as it has a broad eligibility requirement and a track record of successful investment into impactful projects.
- (6) We support efforts by FNS to include more fresh fruits and vegetables into school lunch programs and making fruits and vegetables a required component in offer versus serve policies. We encourage USDA and FNS to continue to support and engage in programs that drive consumption of fruits and vegetables, including the use of salad bars, equipment like sectionizers that make fresh produce easier to eat, and effective nutrition education.

- (7) We also strongly support food banks and other emergency feeding entities as a partner in addressing food waste. We support USDA continuing to redirect commodities to those in need and encourage greater utilization of a wide variety of fresh produce. Different strategies that can help support this work include: allowing TEFAP and other nonprofits to request the specific fruits and vegetables their clients desire to have access to; expand distribution opportunities to more nonprofits, like YMCAs and Boys and Girls Clubs that have access to infrastructure and serve families in need; utilize highly-skilled fresh produce distributors to deliver commodities in an efficient and effective way to the last mile; and ensure that nonprofits and other emergency feeding sites are equipped with any cold infrastructure needed.
- (8) We applaud the efforts to expand the reach of this Strategy abroad to partner with UNEP and others along the supply chain. We want to impress FDA, EPA and USDA with the urgency to reach out to their partner agencies in Canada and the EU (as well as some US states) to have government-to-government discussions about the importance of packaging (and plastic packaging specifically) for ready-to-eat and perishable commodities. We also urge that these government-to-government conversations cover topics such as requirements and food safety considerations for the re-use and re-fill of packaging, “carbon miles” and SPS challenges associated with trans-oceanic and international movement of empty packaging subject to the reuse and refill requirements.

In conclusion, IFPA thanks USDA, EPA and FDA for the thought and effort that went into developing of this National Strategy. IFPA’s membership includes growers of fresh produce and floral, processors, and retailers, as well as those who develop agricultural inputs, transport fresh produce and floral, find alternative uses for food loss and waste, and develop value-added and upcycled products. The breadth of IFPA membership offers unique opportunities to collaborate with the agencies on further fine-tuning and implementing this National Strategy.

We appreciate your consideration of these comments.



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International Fresh Produce Association