

February 2, 2024

U.S. Environmental Protection Agency
EPA Docket Center
Office of Land and Emergency Management
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Docket ID No: EPA-HQ-OLEM-2022-0415: Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics: Request for Comment. 88 Fed. Reg. 84322-84324 (December 14, 2023).

To Whom it May Concern:

The Meat Institute is the leading voice for the meat and poultry industry and has a rich, century-long history. The Meat Institute provides essential member services including legislative, regulatory, scientific, international, and public affairs representation. Together, the Meat Institute's members produce the vast majority of U.S. beef, pork, lamb, and poultry, in addition to the equipment, ingredients, and services needed to produce the safest and highest quality products. Several years ago, the Meat Institute launched a sustainability framework, [Protein PACT](#): For the People, Animals & Climate of Tomorrow, which aims to align the entire animal protein supply chain to accelerate achievement of global goals for healthy people, healthy animals, healthy communities and a healthy planet.

Consumer health is a driving force in the production of meat and poultry products, which not only includes offering nutrient-dense protein food products but also improving and maintaining the safety of the meat and poultry supply. The meat industry plays a critical role in supplying protein to hungry people and this has only grown during the last few years. The Environmental Protection Agency (EPA), Food and Drug Administration (FDA), and U.S. Department of Agriculture (USDA) (collectively, the Agencies) have released the *Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics* (draft Strategy) for public input. The Meat Institute generally supports the draft Strategy and appreciates the opportunity to submit comments. These comments will focus on Objective 1: Prevent food loss where possible and Objective 2: Prevent food waste where possible, specifically on food donation infrastructure. Comments representing some of the Meat Institute's other interests are submitted under a joint letter with the American Frozen Food Institute.

Objective 1: Prevent food loss where possible

Meat packers and processors have long adopted the practice of utilizing the whole animal from “nose to tail.” Though consumers mainly think of muscle cuts when they think of meat and poultry, animal protein products are used in countless human foods, pet food, animal feed, pharmaceuticals, cosmetics, medical supplies, fertilizers, biofuel, and so much more. This whole animal approach has allowed the industry to create the highest value possible out of each animal, while minimizing, and sometimes preventing, true food loss at the slaughter and processing steps of the supply chain. Very little, if anything goes to the landfill.

Recycling options, such as rendering, are a key element of the whole animal approach, allowing the repurposing of scraps to high value outputs, such as animal feed, fertilizer, and biofuel. The EPA’s recent work on Sustainable Management of Food has the potential to further advance the whole animal approach. Unfortunately, it is concerning that the existing, successful, and widely adopted recycling practice of rendering is absent from the EPA’s draft Strategy.

Through the Protein PACT, Meat Institute members have developed environmental metrics for continuous improvement, including to track emissions and set emissions goals. The rendering process reduces overall carbon emissions associated with processing, while at the same time creating useful finished products, such as high-protein animal feed, that decrease the overall carbon cost of agricultural production. Rendering’s transformation of by-products not only minimizes loss at processing, but decreases the environmental impact of traditional feed production. By utilizing rendered products, the livestock industry can substantially reduce its reliance on cultivated crops, ultimately curtailing deforestation, land use changes, and energy-intensive agricultural practices linked to feed production. Not only does this more sustainable feed source directly lessen the carbon footprint of animal agriculture, it promotes a more environmentally responsible livestock sector and supports the broader goal of achieving a circular economy.

It is imperative to include rendering in any discussion, framework, strategy, etc. regarding food waste/loss and organics recycling. Specifically, rendering should be included as a desirable waste stream option on the new Wasted Food Scale¹ and prominently featured in the draft Strategy, because of the demonstrated success of this important recycling stream in creating value and minimizing greenhouse gas emissions.

Objective 2: Prevent food waste where possible

One key part of the Protein PACT is the Meat Institute’s focus on food security. According to Feeding America, meat is one of the top three most needed foods for food charities. Yet, most food banks have extremely limited capacity to safely store, pack, and distribute nutrient-dense meat and other animal-source foods - creating a “protein gap.” This gap particularly impacts women, children, and older adults who have greater need for the

¹ <https://www.epa.gov/sustainable-management-food/wasted-food-scale>

nutrients, vitamins, and minerals best and sometimes only found naturally in animal-source foods (e.g., iron, zinc, vitamin B12). Through the Protein PACT, the Meat Institute has committed to measure and help fill the protein gap by 2025, ensuring that families in need have enough high-quality protein to meet U.S. dietary guidelines.

To support this effort, the Meat Institute formally designated food security a non-competitive issue, facilitating industry-wide information sharing and best practice implementation. Companies enable employees to share best practices and encourage their staffs to advise other companies seeking to improve their food security programs for the good of healthy people and healthy communities.

However, there is a lack of infrastructure to provide for much needed, and wanted, protein products to be repacked. Protein pack rooms are purpose built clean rooms within a food bank designed to repack animal protein products under USDA grant of inspection or exemption. These rooms are critical to ensuring food service or large protein donations are able to be repacked and distributed in consumer friendly sizes, allowing for maximum portions for those in need. Otherwise, those donations could be turned down. There are currently eight protein pack rooms in operation, five with USDA inspection and three operating under USDA retail exemption with restricted distribution.

Several Meat Institute member companies have made substantial food security focused donations to help improve Feeding America's infrastructure for handling animal protein. For example, [Cargill announced](#) a \$4.9 million donation to Feeding America, including to build and expand protein pack rooms. JBS has donated more than \$2 million for improvements in cold storage and distribution, along with contributing to food safety training and safe meal preparation. [Tyson Foods](#) donated \$2.5 million to Feeding America, allocating \$1 million to Equitable Food Access grants, and 2.5 million pounds of protein. However, additional efforts and resources are needed to expand these critical facilities.

Further, additional and better cold-chain infrastructure is necessary to maximize the benefits of refrigerated/frozen foods to reduce food loss and waste. The draft Strategy acknowledges there is insufficient cold chain infrastructure. Funding equipment and infrastructure to properly store and to extend food's usable life, as well as to distribute wholesome food to emergency food assistance organizations is an important priority. Cold chain capacity, including refrigeration and freezer storage, needs to be improved across the supply chain – from the farm level to the food banks and community organizations that are vital to ensuring food security in underserved areas. The Meat Institute supports the agencies' efforts to facilitate expansion of, and innovation, in food donation infrastructure.

Lastly, the draft Strategy indicates that EPA will refine and expand on food donation infrastructure data in the Excess Food Opportunities Map. The Meat Institute supports this effort and recommends including food/meat processing facilities, as well as information for access to cold and frozen storage. Expanding the infrastructure around cold storage and food donation will ensure that less food gets wasted and more goes to those in need.

Summary

Meat and poultry products play a critical role in supplying nourishing protein to all Americans, including through food banks. A robust infrastructure providing for appropriate cold storage as well as protein pack rooms will aid in the delivery of these products to those in need and reduce food waste. Meat and poultry products provide tremendous value beyond the plate and rendering is a key tool to achieve this value and works towards emissions reduction goals. The Meat Institute is committed to closing the protein gap and building healthier communities, and looks forward to working with the agencies to achieve these goals.

The Meat Institute appreciates the opportunity to submit comments on draft Strategy. If you have questions about these comments or anything else about this issue, please contact me. Thank you.

Respectfully submitted,



Susan L. Backus
Vice President, Regulatory and Scientific Affairs

cc: Julie Anna Potts
Mark Dopp
Eric Mittenthal