



January 11, 2024

Carolyn Hoskinson, Director,
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460-0001

Re: **Docket ID No: EPA-HQ-OLEM-2022-0415-0001 - Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics**

Dear Ms. Hoskinson:

The National Association of State Departments of Agriculture (NASDA) appreciates the opportunity to submit comments on the Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics. NASDA represents the commissioners, secretaries, and directors of the state departments of agriculture across all 50 states and 4 U.S. territories. As stewards of a broad spectrum of programs encompassing food safety, disease prevention, economic development in rural communities, conservation, and environmental communities, our commitment to fostering an affordable and resilient food system aligns well with the objectives outlined in the draft strategy.

NASDA applauds the collaborative efforts of the USDA, FDA, and EPA in addressing the critical issue of reducing food loss and waste, which, by some estimates, currently accounts for 40% of all food produced in the United States. This economic impact on American consumers and businesses translates to approximately \$160 billion annually and \$125 per month for a family of four. This underscores the urgency and need for this collective action.

As we strive to address this challenge, it is imperative to note that discarded food is the largest single source of waste in municipal landfills, with the amount of waste increasing every year. While this is a significant problem, it also presents a significant opportunity to close the gap on nutrition security and food access across urban and rural communities nationwide. According to USDA, 12.8% of U.S. households were food insecure at some point in 2022. Reducing food waste can inherently serve as a dual solution, mitigating environmental impact on the climate while enhancing the food security and nourishment of U.S. citizens.

In acknowledging the multifaceted nature of these issues, NASDA underscores the need for a comprehensive approach to reducing food waste and loss. Tackling this problem will require federal and state agencies to work cooperatively alongside industry and community stakeholders to look at every part of the food system. Collaboration across the entire food supply chain is paramount in developing effective strategies.

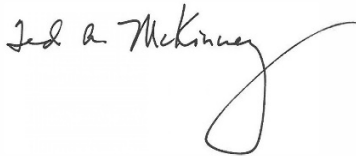
Enhance American food and agricultural communities through policy, partnerships and public engagement.

Since World War I and the subsequent encouragement of the federal government for citizens to plant victory gardens, there has also been an educational campaign by the USDA to reduce food waste. Nevertheless, we understand that there is general agreement that outreach efforts focused on awareness of food loss and waste have been limited at best.

NASDA appreciates that the draft strategy includes references to future workshops for states, municipalities/localities and tribal communities to share the development of other food loss and waste information and highlight and disseminate best practices. State departments of agriculture, both individually and through NASDA, have been actively engaged in various initiatives to strengthen local and regional supply chains, with a particular focus on minimizing food waste and loss. For example, the California Department of Food and Agriculture (CDFA) recently revamped its public website to expand information resources related to food loss and waste. Additionally, new legislation requires collaboration of the lead agency for waste management – CalRecycle – with CDFA. This represents a significant opportunity to reduce the organic waste stream to landfills by 75% in order to achieve methane emission reduction goals. Numerous state departments of agriculture are actively involved in food loss and waste programs, demonstrating a commitment to addressing this critical issue.

NASDA encourages USDA, FDA, and EPA to prioritize coordination with state departments of agriculture on the goals and objectives outlined in this draft strategy. This collaboration will amplify outreach efforts to industry and community stakeholders and contribute to the success of these vital initiatives.

Sincerely,

A handwritten signature in black ink that reads "Ted McKinney". The signature is written in a cursive style with a large, sweeping loop at the end of the name.

Ted McKinney
Chief Executive Officer
NASDA