



February 2, 2024

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Request for Comments on the Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics; Docket ID No. EPA-HQ-OLEM-2022-0415

The Center for Science in the Public Interest (CSPI) respectfully submits these comments to the Environmental Protection Agency (EPA), U.S. Department of Agriculture (USDA), and Food and Drug Administration (FDA) in response to the *Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics* (hereinafter referred to as “the strategy”).

CSPI is a non-profit consumer education and advocacy organization that has worked since 1971 to improve the public’s health through better nutrition and food safety. CSPI helped to lead efforts to win passage of the Nutrition Labeling and Education Act, the Healthy, Hunger-Free Kids Act (to improve school food), the Food Safety Modernization Act, chain restaurant menu labeling, and the Food Allergen Labeling and Consumer Protection Act. CSPI also publishes *Nutrition Action* (NA) and is supported by the subscribers to NA, individual donors, and foundation grants. CSPI is an independent organization that does not accept any corporate donations.

Through feature articles in NA, CSPI has educated hundreds of thousands of readers about topics including the environmental impacts of our food system and opportunities to make personal and system-wide improvements to reduce food loss and waste. Further, through CSPI’s advocacy work related to values-based food procurement, we support a food system that is sustainable, ethical, safe, and healthy. CSPI is a member of the Zero Food Waste Coalition, a coalition of organizations dedicated to informing and influencing U.S. food waste policy at the federal, state, and local levels to drive tangible progress toward the goal of reducing food loss and waste by 50% by 2030.

CSPI strongly supports the efforts of the EPA, USDA, and FDA to reduce food loss and waste and recycle organic materials. This inter-agency approach is critical to ensuring the strategy can have its intended effect, including reducing environmental impacts from methane emissions.

CSPI urges the EPA, USDA, and FDA to also consider additional opportunities identified in this comment. The comment is organized with overarching recommendations first and then recommendations related to the four objectives within the draft strategy.

Overarching Feedback:

- **Create a whole-of-government strategy.** While the strategy is an excellent starting point in having the three primary food agencies (EPA, USDA, and FDA) address food loss and waste within their programming, we encourage the White House and other federal agencies to come together for a whole-of-government strategy. All federal agencies should be

engaging in reducing food waste within their own internal and programmatic procurement. Additionally, as outlined in the Draft National Strategy, there is a strong need for collaboration to reach the national goal.

For example, EPA, USDA, and FDA should collaborate with the Centers for Disease Control and Prevention (CDC) on food-waste-reduction strategies related to food donations and improving access to healthy and affordable food. The CDC has developed relationships with an extensive network of grant partners and has expertise on topics like the charitable food system. In 2023, CDC funded 17 states, 50 community/Tribal organizations, and 16 land grant universities to implement strategies to improve nutrition and physical activity, reduce health disparities, and advance chronic disease prevention efforts.¹ One of the priority nutrition strategies includes working with the charitable food system to adopt nutrition guidelines.² As such, EPA, USDA, and FDA, can build off the partnerships that have already been developed through years of CDC investment and work to integrate food loss and waste strategies where there is alignment with state and local programs.

- **Commit to more extensive measurement and reporting in executing the strategy.** We agree with the strategy's recognition that there is a national data gap when it comes to food loss and waste, particularly when it comes to on-farm and supply chain food loss and waste. We appreciate the attempt to bridge this data gap across the strategic actions and objectives, and we call on EPA, USDA, and FDA to build on these actions by investing further in food loss and waste measurement and reporting.

Existing data on food loss and waste is limited and often outdated, which makes the models using this data across the supply chain imprecise. By investing in thorough food loss and waste measurement up-front, EPA, USDA, FDA can improve the accuracy of measurement models and thereby support actors on the ground using this information, such as advocates, policymakers, and businesses.

There are many activities and programs included within the strategy that could benefit from more extensive measurement and reporting, in particular gleaning, food recovery, and school food programs. Measuring and documenting the results of each of the strategic initiatives in quantifiable ways will help better understand the impact of these programs, develop best practices, and support the growth of the most effective strategies.

Other actions the strategy should include to improve food loss and waste data and estimation methodologies are:

- **Create a cross-agency strategic research plan on how to use existing research authorizations to investigate pressing food loss and waste issues** as part of strategic action 2(E). We suggest that the agencies develop a strategic food loss and waste research plan that identifies all the key food loss and waste research gaps. The plan should then consider all of the agencies' research authorities (ideally including the research authorities of federal agencies outside of the EPA, USDA, and FDA such as the National Science Foundation) for how they might use existing research programs and funding to tackle these research gaps.

¹ Center for Disease Control and Prevention. *State and Local Programs*. n.d. <https://www.cdc.gov/nccdphp/dnpao/state-local-programs/index.html>. Accessed January 24, 2024.

² Center for Disease Control and Prevention. *Priority Strategy: Food Service and Nutrition Guidelines*. n.d. <https://www.cdc.gov/nutrition/state-and-local-strategies/priority-nutrition-strategy.html>. Accessed January 24, 2024.

- **Include public reporting of any food loss or waste data the agencies collect.** We suggest the agencies consider adding a commitment to public reporting on food loss and waste data for all their strategic actions, especially the places where the strategy mentions data collection. For example, strategic action 1(B) mentions investment in the Small Business Innovation Research program. The agencies should consider ways to track and report on food loss and waste associated with supply chain resiliency.
- **Commit to public-private alignment on closing the food loss and waste data gap.** A number of tools are emerging to improve the food loss and waste data landscape. The agencies should evaluate these tools and find ways to partner with their creators to scale their use. For example, the Global Farm Loss Tool was developed and recently beta tested with major food suppliers to become the standard for on-farm measurement across row and specialty crops and could be one such tool considered for public-private alignment.³
- **Commit to updating the Waste Reduction Model (WARM).** WARM is a tool that compares estimates of greenhouse gas emissions, energy savings, and economic impacts of specific materials to alternative options.⁴ The agencies should add a strategic action to update the WARM model every time there is new relevant data.
- **Lay out a clear plan and more specific commitments for how EPA, USDA, and FDA will promote environmental justice and equity, including through meaningful engagement of Tribal communities, African Americans, the Latine population, and other subpopulations affected by environmental justice concerns. Clarify the extent of disparities from impacts of food loss and waste on these communities.**

Mitigating challenges related to food loss and waste that disproportionately impact certain communities is critical. In a 2021 report released by the EPA, the degree to which income, educational attainment, age, and race and ethnicity moderate the impacts of climate change in certain communities was examined.⁵ The report quantified six types of impacts including air quality and health and extreme temperature and health and found that race and ethnicity were the best predictors of residing in areas with the projected highest levels of climate change impacts.⁶

We appreciate the draft strategy's commitment to a core tenet of public health: to ensure communities are engaged in the decisions that affect them. However, while the draft strategy lays out a commitment to environmental justice and equity, it must include exactly how the agencies plan to engage with those most likely to be impacted such as Tribal

³ World Wildlife Fund. *Creating a Unified Approach to Measure Loss on Farms Globally*. n.d. <https://www.worldwildlife.org/pages/creating-a-unified-approach-to-measure-loss-on-farms-globally>. Accessed January 24, 2024.

⁴ U.S. Environmental Protection Agency. *Basic Information about the Waste Reduction Model*. n.d. <https://www.epa.gov/warm/basic-information-about-waste-reduction-model>. Accessed January 24, 2024.

⁵ U.S. Environmental Protection Agency. *Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts*. September 2021. <https://www.epa.gov/cira/social-vulnerability-report>. Accessed January 24, 2024.

⁶ U.S. Environmental Protection Agency. *Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts*. September 2021. <https://www.epa.gov/cira/social-vulnerability-report>. Accessed January 24, 2024.

communities, African Americans, the Latine population, and other subpopulations with environmental justice concerns. Further, the strategy should include more information on the extent of disparities from impacts of food loss and waste on these communities to properly frame the issue and highlight its importance.

- **Incorporate opportunities to strengthen implementation of the Food Service Guidelines for Federal Facilities (FSG) across the federal government. These strategies could be included via the following recommendations:**
 - **EPA, USDA, and FDA should establish agency-level policies to require that all new and renegotiated food service contracts and permits meet the standards (including waste diversion standards) outlined in the current [Food Service Guidelines for Federal Facilities](#).**⁷
 - **EPA should incorporate the FSG into the Cafeteria category of its Environmentally Preferable Purchasing Program.**⁸

The scale of food service operations in federal facilities presents considerable opportunity for the federal government to 1) prevent and divert wasted food and 2) lead by example for state and local governments and the private sector. Federal facilities serve food to millions of federal employees including military and civilian personnel; people in the custody of federal prisons; people receiving healthcare services at Veterans Health Administration and Indian Health Services facilities; and visitors to national parks, museums, and other attractions.

The 2017 FSG's specify best practices to prevent and divert wasted food in federal facility food service operations.⁹ These voluntary guidelines for concessions and vending services in federal facilities are intended to increase healthy food and beverage choices for federal employees, minimize environmental impacts of food service operations, and support local economies.¹⁰ A workgroup of representatives from nine federal departments and agencies, including USDA, EPA, and FDA, established these best practices in alignment with the *Dietary Guidelines for Americans* and relevant scientific literature.¹¹ The FSG's waste diversion standards include implementing waste diversion programs for employees and consumers, monitoring the relationship between waste and food procurement, repurposing excess food for future meal preparation, and donating edible surplus food for human consumption where possible.

⁷ Food Service Guidelines Federal Workgroup. *Food Service Guidelines for Federal Facilities*. U.S. Department of Health and Human Services. 2017. <https://www.cdc.gov/nutrition/food-service-guidelines/federal-facilities.html>. Accessed January 24, 2024.

⁸ United States Environmental Protection Agency. *Recommendations of Specifications, Standards, and Ecolabels for Federal Purchasing*. N.d. <https://www.epa.gov/greenerproducts/recommendations-specifications-standards-and-ecolabels-federal-purchasing>. Accessed January 24, 2024.

⁹ Food Service Guidelines Federal Workgroup. *Food Service Guidelines for Federal Facilities*. U.S. Department of Health and Human Services. 2017. <https://www.cdc.gov/nutrition/food-service-guidelines/federal-facilities.html>. Accessed January 24, 2024.

¹⁰ Food Service Guidelines Federal Workgroup. *Food Service Guidelines for Federal Facilities*. U.S. Department of Health and Human Services. 2017. <https://www.cdc.gov/nutrition/food-service-guidelines/federal-facilities.html>. Accessed January 24, 2024.

¹¹ Food Service Guidelines Federal Workgroup. *Food Service Guidelines for Federal Facilities*. U.S. Department of Health and Human Services. 2017. <https://www.cdc.gov/nutrition/food-service-guidelines/federal-facilities.html>. Accessed January 24, 2024.

However, voluntary adoption of the FSG within the federal government has historically included a variety of challenges such as limited ability for agencies to implement guidelines and limited information on products that meet the guidelines.¹² A notable exception is the CDC, which adopted an organizational policy in 2018 that requires all new and renegotiated food service contracts to meet the standards outlined in the FSG.¹³ In September 2022, President Biden included a commitment to update and implement the FSG across federal facilities in the National Strategy on Hunger, Nutrition, and Health.¹⁴ Since then, neither the White House nor individual agencies have taken additional steps to deliver on this commitment.¹⁵ The draft strategy is an opportunity for EPA, USDA, and FDA to commit to full implementation of the FSG in their own facilities and to support similar commitments by other federal agencies to advance multiple Biden administration priorities.

- **Establish incentives under existing and future grant programs for applicants to develop and implement food waste plans.** The EPA, USDA, and FDA should use their own funding programs as leverage to facilitate food loss and waste reduction efforts by their grantees. The agencies should require grant applicants to develop food waste plans as a condition of receiving grant funding or offer bonus points to grant applicants that include food waste plans. Food waste plans could include a commitment by applicants to contract with food recovery organizations to recover surplus, wholesome food, and/or to track and report on their own food waste.

The USDA already requires certain program participants to donate food, such as with the USDA Farmers Market,^{16,17} which demonstrates the feasibility of implementing donation requirements. One example of a grant program primed for such a requirement is the Local Agriculture Market Program (LAMP), which includes support for local and regional food markets and enterprises.¹⁸ Requiring or promoting the development of food waste plans by LAMP applicants can help disseminate more sustainable practices for federally funded programs.

- **Commit to allocating sufficient funding to implement the strategy.** It is not clear from the strategy that the projects and programs within it are funded. We recommend the final

¹² U.S. Government Accountability Office. *Federal Food Service Operations: Implementation of the HHS/GSA Health and Sustainability Guidelines*. GAO-15-262R. December 23, 2014. <https://www.gao.gov/products/gao-15-262r>. Accessed January 24, 2024.

¹³ U.S. Department of Health and Human Services. *Food Service Guidelines in CDC-Owned or -Operated Dining and Vending Facilities*. Policy # CDC-AM-2018-01. January 11, 2018. <https://www.cdc.gov/other/pdf/FSG-Policy-CDC-20230725.pdf>. Accessed January 24, 2024.

¹⁴ The White House. *Biden-Harris Administration National Strategy on Hunger, Nutrition, and Health*. September 2022. <https://www.whitehouse.gov/wp-content/uploads/2022/09/White-House-National-Strategy-on-Hunger-Nutrition-and-Health-FINAL.pdf>. Accessed January 24, 2024.

¹⁵ Multer J. *The White House Conference: A Report on Progress After One Year*. Center for Science in the Public Interest. October 2023. <https://www.cspinet.org/resource/white-house-conference-hunger-nutrition-and-health-report-progress-after-one-year>. Accessed January 24, 2024.

¹⁶ U.S. Department of Agriculture. OMB. No. 0581-0229: USDA Farmers Market 2019 Rules and Procedures and Operating Guidelines. January 2019. <https://www.ams.usda.gov/sites/default/files/media/USDAFarmersMarketRulesandProceduresandOperatingGuidelines.pdf>

¹⁷ 7 C.F.R. § 170.12(c).

¹⁸ U.S. Department of Agriculture Agricultural Marketing Service. *Local Agriculture Market Program*. n.d. <https://www.ams.usda.gov/services/grants/lamp>. Accessed January 24, 2024.

strategy includes clear allocations of funding across its strategic actions to ensure implementation.

Feedback on Draft Strategy Objectives:

Objective 1: Prevent food loss where possible.

- **USDA should evaluate The Emergency Food Assistance Program (TEFAP) Farm to Food Bank (FTFB) Projects to gain insights into the impact of projects, best practices, and opportunities for improvements.**

Strategic Action 1(A) includes information about USDA’s Food and Nutrition Service intention to continue supporting TEFAP. TEFAP FTFB provides a key opportunity to increase nutritious donations while cutting food waste. In 2022, an estimated 12.2 million tons of surplus food went unharvested.¹⁹ FTFB Projects provide a pathway for quality food to be harvested and distributed through emergency feeding organizations.

TEFAP funding was first established through the Agriculture Improvement Act of 2018.²⁰ Over 50% of states received funding through TEFAP FTFB in FY2023.²¹ However, there has not been a comprehensive evaluation of the program. An evaluation of the TEFAP FTFB Projects could increase understanding of the impact on food waste, document the nutritional quality of food donations, highlight best practices and trends for sourcing of food donations, and provide a basis for the most effective uses of the limited funding.

Objective 2: Prevent food waste where possible.

- **USDA and FDA should use their pre-existing authorities to standardize and clarify date labels on food packaging.**

Date labeling terms like “best by” and “sell by” typically reflect the manufacturers’ suggestion for how long the food will taste the freshest rather than indicating anything about the safety of the product.²² The confusion around these unstandardized date labels impacts businesses that may consider donating surplus food as well as consumers considering whether the food they have at home can be consumed or should be discarded on a precautionary basis. In the absence of standardized federal labeling, states have created a patchwork of policies that tend to vary widely.²³ Federal regulation standardizing date labels on packaging is necessary to prevent food waste due to business and consumer confusion.

¹⁹ ReFED. *Insights Engine: Food Waste Monitor*. n.d. https://insights-engine.refed.org/food-waste-monitor?break_by=destination&indicator=tons-surplus&view=detail&year=2022. Accessed January 24, 2024.

²⁰ Agriculture Improvement Act of 2018. P.L. 115-334.

²¹ U.S. Department of Agriculture. FY 2023 Farm to Food Bank Project Summaries. n.d. <https://www.fns.usda.gov/tefap/fy-2023-farm-food-bank-project-summaries>. Accessed January 24, 2024.

²² Dow, C. *What Do the Date Labels on Food Actually Mean?* Center for Science in the Public Interest. February 27, 2020. <https://www.cspinet.org/daily/food-safety/what-do-the-date-labels-on-food-actually-mean>. Accessed January 24, 2024.

²³ ReFED. *Date Labeling Regulations*. n.d. <https://policyfinder.refed.org/spotlight-on-date-labeling>. Accessed January 24, 2024.

Strategic Actions 2(A) and 2(C) refer to a consumer education and behavior change campaign and successful efforts by other countries to partner with the private sector to address labeling issues. While these approaches are welcomed and may contribute to decreased confusion, a necessary first step and more proactive approach of formally standardizing and clarifying date labeling is necessary.

USDA and FDA already have the ability to offer guidance on appropriate date labeling terms and could explore requiring standardized date labels under their authority to ensure product labels are not misleading.^{24,25,26,27,28} Because USDA and FDA have jurisdiction over different food products—USDA generally has authority to regulate meat, poultry, and some egg products, while FDA has authority to regulate safety and labeling for most food products—agencies would need to act in coordination to ensure that labeling language is the same for all food products.

- **USDA should protect and strengthen school nutrition standards and educate stakeholders about the scientific evidence on nutrition standards and waste.**

Strategic Action 2(B) covers several strategies to reduce food waste in schools. This recommendation and several of our following recommendations provide detailed opportunities to build upon the actions included in the draft strategy. While it's important to invest in and explore new ideas, it's also important to protect and build upon existing programs.

According to USDA data, nearly one-third of all vegetables and milk served in the National School Lunch Program (NSLP) are wasted.²⁹ The World Wildlife Fund estimates that 530,000 tons of food and 45 million gallons of milk are wasted per year in school cafeterias.³⁰

There have been claims that the Healthy, Hunger-Free Kids Act (HHFKA) revisions to school nutrition standards are to blame for the amount of waste in school cafeterias and that weakening of nutrition standards is a solution to reduce waste from the program. However, research has not found this. USDA's nationally representative School Nutrition and Meal Cost Study found that the quantity of food waste before and after the implementation of HHFKA were similar but that the nutritional quality of food consumed improved.³¹ A 2021 systematic review analyzing strategies to improve school meal consumption concluded that "concerns regarding an increase in food waste following the HHFKA were not supported."³²

²⁴ 21 U.S.C. § 331(b)

²⁵ 21 U.S.C. § 463(a)

²⁶ 21 U.S.C. § 607(c),(e)

²⁷ 21 U.S.C. § 1043

²⁸ 9 C.F.R. § 317.8

²⁹ U.S. Department of Agriculture. *School Nutrition and Meal Cost Study Volume 4: Student Participation, Satisfaction, Plate Waste, and Dietary Intakes*. April 2019. <https://www.fns.usda.gov/school-nutrition-and-meal-cost-study>. Accessed January 24, 2024.

³⁰ World Wildlife Fund. *Food Waste Warriors: A Deep Dive into Food Waste in US Schools*. 2019. <https://www.worldwildlife.org/stories/food-waste-warriors>. Accessed January 24, 2024.

³¹ U.S. Department of Agriculture. *School Nutrition and Meal Cost Study Volume 4: Student Participation, Satisfaction, Plate Waste, and Dietary Intakes*. April 2019. <https://www.fns.usda.gov/school-nutrition-and-meal-cost-study>. Accessed on January 24, 2024.

³² Cohen JFW, et al. *Strategies to Improve School Meal Consumption: A Systematic Review*. *Nutrients*. 2021;13(10):3520.

- **USDA and Department of Education (ED) should work together to issue best practices on scheduling lunch and recess to help reduce food waste and to establish a school-based, age-appropriate food loss and waste curriculum.**

An adequate amount of time to eat, also known as seat time, is essential to ensuring that students can fully enjoy their meals. There are currently no federal regulations regarding a minimum lunch period. Students need at least 20 minutes to eat their meal and socialize with peers, in addition to the time needed to walk to the cafeteria, receive and pay for their food, and clean up afterward.³³ Students with less than 20 minutes to eat consumed 13% less of their entree and 12% less of their vegetables, compared to students with a lunch period of at least 25 minutes to eat.³⁴ A systematic review found that students with a lunch period longer than 20 minutes consumed more of their meals and placed less of their meals in the trash.³⁵

For elementary schools, a systematic review found that scheduling recess before lunch is associated with an increase in students' meal consumption (possibly because students expend more energy at recess and therefore are hungrier come lunchtime) and in turn, less plate waste.³⁶

As the draft strategy recommends, it is important to create programs that educate children and youth about strategies to reduce food waste and encourage development and adoption of lifelong best practices. We recommend that USDA should, in collaboration with ED, establish age-appropriate food loss and waste education that can be incorporated into lesson plans and implemented in cafeterias at no- or low-cost. As with nutrition education, lessons learned in the classroom should be reinforced and practiced in the school cafeteria.

The National Institute of Food and Agriculture's Food and Agriculture Service Learning Program grants and USDA Food and Nutrition Service's Patrick Leahy Farm to School Grant Program are good opportunities to integrate food loss and waste education into implementation strategies. Further, these programs promote the incorporation of local and regional seasonal food into cafeterias, resulting in shorter supply chains and fresher products. USDA should continue to explore opportunities to prioritize funding for and reduce barriers to these grants for small, rural, and/or tribal schools that have neither the resources nor the capacity to apply for new grant funding.

It should be noted that while educating students is a critical part of reducing food loss and waste, structural barriers inherent in many school foodservice operations such as infrastructure cannot be solved by changing student behaviors.

- **USDA should encourage and incentivize schools to explore offer-versus-serve (OVS) and fund research to fully understand the extent of OVS benefits.**

³³ Centers for Disease Control and Prevention. *Making Time for School Lunch*. n.d. https://www.cdc.gov/healthyschools/nutrition/school_lunch.htm. Accessed January 25, 2024.

³⁴ Cohen JFW, et al. *The Amount of Time to Eat Lunch is Associated with Children's Selection and Consumption of School Meal Entrée, Fruits, Vegetable, and Milk*. *J Acad Nutr Diet*. 2016;116(1):123-128.

³⁵ Cohen JFW, et al. *Strategies to Improve School Meal Consumption: A Systematic Review*. *Nutrients*. 2021;13(10):3520.

³⁶ Cohen JFW, et al. *Strategies to Improve School Meal Consumption: A Systematic Review*. *Nutrients*. 2021;13(10):3520.

OVS allows students to decline some of the food items offered in the NSLP and School Breakfast Program.³⁷ It is mandatory for high schools and optional for elementary and middle schools.³⁸ In elementary schools, the use of OVS is correlated with significantly lower levels of waste for calories and fruits and vegetables when compared to serve-only schools.³⁹ Additionally, offering a greater variety of entrées (4 to 5 choices) is associated with less food waste.⁴⁰

USDA should fund research to better understand existing implementation of OVS, document potential challenges, identify best practices for OVS with grades K-8, and consider opportunities to implement OVS for some items (like milk, which is among the most wasted items) and not others.

- **USDA should work with states to deliver state-based trainings to schools on waste reduction strategies.**

USDA has several [resources and curricula](#) covering topics related to reducing food waste in schools that are available online.⁴¹ These tools could have greater reach if they were incorporated into state-based trainings. Regional Team Up for School Nutrition Success trainings provided an essential opportunity for school nutrition directors to network and share best practices on offering healthier meals. In the past, some states have offered state-based versions of these trainings, which were able to reflect unique cultural food preferences and, in some cases, were more convenient for School Food Association (SFA) staff to attend. USDA could implement a similar model to identify champions and come up with action plans to host state-based trainings. The Agency should also consider specific training modules and tools that SFA leadership can share with their staff at individual schools. USDA could consider using the model of the upcoming Healthy Meals Summits to share waste reduction strategies.

- **USDA should incorporate waste reduction strategies in the collection and sharing of best practices under the Healthy Meals Incentives Initiative and create an award designation for schools focused on waste reduction strategies.**

The Healthy Meals Incentive (HMI) program was established by USDA “to improve the nutritional quality of school meals through food systems transformation, school food authority recognition and technical assistance, the generation and sharing of innovative ideas and tested practices, and grants.”⁴² Prior to the HMI initiative, the Healthier US Schools Challenge incentivized healthier school environments through an awards program⁴³ and instilled pride and friendly competition in

³⁷ U.S. Department of Agriculture. *Updated Offer vs Serve Guidance for the NSLP and SBP Beginning SY2015-16*. July 21, 2015. <https://www.fns.usda.gov/cn/updated-offer-vs-serve-guidance-nslp-and-sbp-beginning-sy2015-16>. Accessed January 25, 2024.

³⁸ U.S. Department of Agriculture. *Updated Offer vs Serve Guidance for the NSLP and SBP Beginning SY2015-16*. July 21, 2015. <https://www.fns.usda.gov/cn/updated-offer-vs-serve-guidance-nslp-and-sbp-beginning-sy2015-16>. Accessed January 25, 2024.

³⁹ U.S. Department of Agriculture. *School Nutrition and Meal Cost Study Volume 4: Student Participation, Satisfaction, Plate Waste, and Dietary Intakes*. April 2019. <https://www.fns.usda.gov/school-nutrition-and-meal-cost-study>. Accessed on January 24, 2024.

⁴⁰ U.S. Department of Agriculture. *What You Can Do to Help Prevent Wasted Food*. January 2020. <https://www.fns.usda.gov/tn/what-you-can-do-help-prevent-wasted-food>. Accessed January 25, 2024.

⁴¹ U.S. Department of Agriculture. *Reducing Food Waste at K-12 Schools*. n.d. <https://www.usda.gov/foodlossandwaste/schools>. Accessed January 30, 2024.

⁴² U.S. Department of Agriculture. *Healthy Meals Incentives for Schools*. n.d. <https://www.fns.usda.gov/school-meals/hmi#:~:text=FNS%20has%20established%20the%20Healthy,and%20tested%20practices%2C%20and%20grants>. Accessed January 25, 2024.

⁴³ Let's Move. *The HealthierUS School Challenge*. n.d. <https://letsmove.obamawhitehouse.archives.gov/healthierus-school-challenge>. Accessed January 30, 2024.

participating schools. We anticipate that HMI will do the same. USDA should incorporate waste reduction strategies in the collection and sharing of best practices and create an award designation for schools focused on waste reduction strategies. This will help generate momentum, incentivize schools to reduce food waste, and create further goodwill between the agency and schools.

- **USDA should continue supporting TEFAP Reach and Resiliency grants in order to expand the infrastructure and capacity of emergency food organizations.**

TEFAP Reach and Resiliency grants provide support to expand the capacity of TEFAP to reach more remote, rural, Tribal, and/or low-income areas, including through opportunities to build distribution and cooling and freezing infrastructure.⁴⁴ Forty-two state agencies have received funding, demonstrating a need across the country to enhance emergency food systems.⁴⁵ The projects include conducting assessments of the current reach of TEFAP, expanding mobile distribution infrastructure, and investments in cooling/freezing capacity, which are all critical to facilitating food donations and improving access to fresh food.

- **EPA and USDA should ensure that food quality is incorporated in food donation projects and conduct research to assess any quality concerns.**

Strategic Action 2(D) supports facilitating and incentivizing food donations to improve access to healthy and affordable food. All projects aimed at increasing food rescue and donation should assess the quality, nutrition, and appropriateness of the food being rescued, not just the quantity. The agencies should include language specifying this in order to signal to readers and actors the importance of prioritizing quality and not just quantity when it comes to food donation.

- **USDA should conduct research to evaluate the impact of food hubs on preventing food loss and waste.**

USDA defines food hubs as “a centrally located facility with a business management structure facilitating the aggregation, storage, processing, distribution, and/or marketing of locally/regionally produced food products.”⁴⁶ A 2017 report from USDA found that there were approximately 360 active food hubs in the US.⁴⁷ Because food hubs often sell on a regional scale, they may reduce the amount of travel-related time for food to reach retailers or consumers, thereby reducing food loss that may occur from long-distance travel. In a national study, 50% of surveyed food hub managers reported composting unused produce rather than discarding it.⁴⁸

Food hubs also offer greater opportunity for regional producers to aggregate products and enter new markets that they may otherwise be unable to tap into due to capacity or production size. For

⁴⁴ U.S. Department of Agriculture. *TEFAP Reach and Resiliency Grant Initiative*. n.d. <https://www.fns.usda.gov/tefap/reach-resiliency-grant>. Accessed January 25, 2024.

⁴⁵ U.S. Department of Agriculture. *TEFAP Reach and Resiliency Grant Initiative*. n.d. <https://www.fns.usda.gov/tefap/reach-resiliency-grant>. Accessed January 25, 2024.

⁴⁶ Barham J. U.S. Department of Agriculture. *Getting to Scale with Regional Food Hubs*. December 14, 2010. <https://www.usda.gov/media/blog/2010/12/14/getting-scale-regional-food-hubs>. Accessed January 26, 2024.

⁴⁷ U.S. Department of Agriculture. *Running a Food Hub: Learning from Food Hub Closures: Volume 4*. August 2017. <https://www.rd.usda.gov/publicationforcooperatives/sr-77-running-food-hub-volume-4-learning-food-hub-closures>. Accessed January 26, 2024.

⁴⁸ Shariatmadary H, et al. Assessing Sustainability Priorities of U.S. Food Hub Managers: Results from a National Survey. *Foods*. 2023;12(13):2458.

example, mid-size farms may produce too much food to sell directly to consumers, but not enough to enter wholesale markets, often leaving behind a large quantity of food loss.⁴⁹

More research should be done to assess the extent to which food hubs prevent food loss and waste due to their unique positioning in the food supply chain, including in their capacity to provide additional market opportunities for local and regional producers.

Objective 4: Support policies that incentivize and encourage food loss and waste prevention and organics recycling.

- **EPA should support and incentivize local policies that prevent and/or reduce disproportionate exposure to food waste-related pollutants in priority populations.**

Landfills and other hazardous waste sites are often located near communities with racialized identities and/or those with lower socioeconomic status.⁵⁰ According to the EPA, food is the single largest category of material in municipal landfills, emitting food waste-related pollutants such as methane into the communities near the site.⁵¹ As such, addressing exposure to food waste-related pollutants through improved zoning ordinances and approaches that center best practices for environmental justice, racial equity, and racial justice is needed in the current proposal.

The EPA could incentivize municipalities to require all new landfill site proposals to undergo a racial equity impact assessment (REIA). Race Forward describes a REIA as a “systematic examination of how different racial and ethnic groups would likely be affected by a proposed action or decision.”⁵² Investments in municipal infrastructure to reduce the effects of existing pollution are urgently needed.

Conclusion:

The Center for Science in the Public Interest commends the efforts made by the EPA, USDA, and FDA to build a comprehensive plan to address food loss, food waste, and recycling organics. Our recommendations provide opportunities to expand upon ideas included in the *Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics*. Thank you for considering our comment.

⁴⁹ New York State-New York City Regional Food Hubs Task Force. *New York State-New York City Regional Food Hubs Task Force Final Action Plan*. n.d.

https://agriculture.ny.gov/system/files/documents/2019/10/fhtf_report_final.pdf. Accessed January 26, 2024.

⁵⁰ Nolan L. *The Link Between Environmental Justice and Landfills*. May 6, 2021.

<https://storymaps.arcgis.com/stories/64d1923708814bd59e7d3d79f03d426f>. Accessed January 26, 2024.

⁵¹ U.S. Department of Agriculture. *Why should we care about food waste?* n.d.

<https://www.usda.gov/foodlossandwaste/why>. Accessed January 26, 2024.

⁵² Keleher T. *Racial Equity Impact Assessment*. Race Forward. 2009.

<https://www.raceforward.org/resources/toolkits/racial-equity-impact-assessment-toolkit>. Accessed January 26, 2024.