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June 27, 2022

The Hon. Representative Frank Pallone, Jr., Chair
The Hon. Representative Cathy McMorris Rodgers, Ranking Member
House Energy & Commerce Committee
2125 Rayburn House Office Building
Washington, DC 20515

Dear Representatives Pallone and Rodgers and Committee:

The US Composting Council, a national organization representing more than 2,000 individuals and 800 companies and organizations in the compost manufacturing industry across the U.S., is in support of the introduced Recycling and Composting Accountability Act, HR8059.

It is critically important that:

- a) National data be gathered to support the need to expand composting programs – both residential and commercial – throughout the United States. With this goal in mind, the US Composting Council has recently succeeded in a change to the industry's National Industry Classification Code Standard that will result in industry data collection by the Census Bureau that will enhance the data collection outlined in this bill.
- b) Expansion of composting programs will provide important climate, water conservation, soil health and waste diversion goals that are in the plans of thousands of municipalities and states. Compost use is an ecosystem service that provides all of these important benefits while providing an elegant, localized way of closing the loop on food residuals and green waste materials. At the same time, it provides co-benefits of jobs and ripples throughout the supply chain of local economies-including equipment, engineering, and site development.
- c) Composting is considered part of the recycling space in this bill. This perspective is one USCC has been advocating for several years; municipalities working towards zero waste have targeted organics diversion as a necessary element of waste reduction due to the 40%-plus of compostable materials in their waste streams.

For those reasons, we are in full support of this bill. We have further suggestions to make it even better:

- 1) The American Association of Food and Plant Control Officials (AAPFCO) is a national body composed of state regulators of fertilizers, soil amendments and compost. They have an updated definition of compost that should be substituted for the bill's definition.

Compost – is the product manufactured through the controlled aerobic, biological decomposition of biodegradable materials. The product has undergone mesophilic

and thermophilic temperatures, which significantly reduces the viability of pathogens and weed seeds, and stabilizes the carbon such that it is beneficial to plant growth. Compost is typically used as a soil amendment, but may also contribute plant nutrients.

Why is this important?

As new laws and regulations on “composting” and “compost” are enacted it is important to have accurate and current definitions. Likewise, due to the huge interest in compost and composting, there are number of products being produced in the soil health space that are “compost like” but not quite compost, and if used in the incorrect manner, will not do the work of compost or could possibly do harm if used in the wrong application. AAPFCO corrected the definition in 2019 to address this issue.

- 2) The bill limits the focus on data and expansion of composting to *residential* composting. Commercially generated food and green waste not only comprise at least half of the material collected, but are also best-practice “starter” feedstock for new organics recycling programs because of their more homogenous, less contaminated composition. We strongly urge that you strike the word *residential*, or add in *commercial* in its references, so as not to limit the scope of the bill.

The US Composting Council stands ready to lend expertise, on-the-ground conversations with our compost manufacturer and collection members, and first-hand looks at the operation of compost facilities for committee and Member staff. Please don’t hesitate to reach out to us at a moment’s notice!

Sincerely,



Frank Franciosi, Executive Director
CC: USCC Board of Directors