December 2, 2020

Mr. John Fischer,
MassDEP
1 Winter St.
Boston, MA 02108

Dear Mr. Fischer:

On behalf of the US Composting Council, I am submitting this letter of support for Massachusetts Department of Environmental Protection amendments to 310 CMR 19.000 Solid Waste Facility Regulations that would lower the threshold for the existing ban on disposal of commercial organic (food) materials so that it applies to facilities that generate one-half a ton per week or more of these materials for disposal. This change would benefit Massachusetts by further encouraging local management of organic resources. Food processors, institutions and other large-scale generators of food scraps – the law’s targets – want beneficial and local use of their food scraps.

We also encourage Massachusetts to market training and certification of compost facility operators though USCC’s Professional Certification program to increase the number of facilities and infrastructure to handle these additional materials for composting for those residuals that cannot be averted through food waste reduction and rescue. We also hope for your engagement and support as a template for regulation of labelling of compostable products to mitigate the contamination that can be a side effect of increased composting.

The US Composting Council appreciates the leadership role of the Massachusetts DEP and the executive branch in addressing composting and food scrap diversion.

Sincerely,

Frank Franciosi, Executive Director