May 21, 2020

Ken DaRos, Acting Director

Cal Recycle

Dear Mr. DaRos:

As the national organization representing the composting industry, we are pleased to provide public comments on California’s proposed regulations for SB1335, *Solid waste: food service packaging: state agencies, facilities, and property.*

We applaud the goal of avoiding landfilling of packaging that is not compostable in state facilities. We encourage you to ensure that the feedback, systems and concerns of compost manufacturers is taken into account in the rollout of these purchases by stage agencies. We recommend that, when possible, state purchasing agents who are seek compostable food serviceware seek contracts or assurances from products companies that accessibility for successful composting of their products is guaranteed.

The USCC and our foundation, the Composting Council Research and Education Foundation, has instituted an open-source database for field testing of compostability to increase the information available about this challenge, and one of our members, the Compost Manufacturing Alliance, works daily to test compostability of packaging and act as a bridge between composters and products companies. Additionally, the USCC’s Target Organics project, with the goal of addressing municipal-level issues (including contamination), is integrating product compostability as a key policy item to address.

We also continue to support a unified, national identification system. We request the State of California’s participation and leadership as that system moves forward through the work of our partners at the Biodegradable Products Institute as well as compostable products companies who are USCC members. Compostable products are critical to the goal of reducing food scrap that is being sent to landfills, and regulations that facilitate a system of effective composting of these products is a necessary cohort to grow the use of compostable products.

Sincerely,

Frank Franciosi, Executive Director