



We Feed You

February 18, 2025

House Committee on Climate, Energy, and Environment

RE: Testimony on House Bill 3018 – Food Waste Reduction and Composting Requirements

Chair Lively and Members of the Committee,

Thank you for the opportunity to provide testimony on House Bill 3018.

Food Northwest represents food manufacturers based in or operating in the Pacific Northwest. We share the goal of reducing food waste and minimizing food waste during the manufacturing process is inherent to food businesses.

While this bill focuses on the composting option for food waste, there are numerous methods food processors follow to avoid food waste. It is inherent to provide as much edible food as possible for sale from a food processing point of view. Food residuals including inedible components, wastewater residuals, and solid food waste are all managed in environmentally responsible methods which could include use as animal feed, anaerobic digestion for energy recovery, and where appropriate composting. These methods are all subject to various regulatory systems, and an additional system for regulating compostable by-products is not needed to insure the materials are properly managed.

Food northwest opposes House Bill 3018 as written and requests a number of changes to address our concerns.

First, there are a few minor, but important additions that need to be made to the list of exemptions from "food waste". Food waste used to generate energy should be added. Anaerobic digestion of food wastes does generate fuel in a sense, but that fuel is often immediately converted to energy for use onsite. Adding "energy production" under the exemption would allow this environmental practice to continue.

Second, we want to clarify that inedible parts of plants or animals that are removed during food processing are not food waste. While some vegetable and animal parts are compostable, many are not. Those components are often removed during the food processing step converting raw produce or whole animals into food. For example, shells, husks, stems, leaves, hair, fur, scales, skin, and bones are not food, and many are not readily compostable, so they should be exempted from the composting requirements. We would like to make sure that is clarified in the bill.

Third, food that have been recalled or otherwise discarded due to a food safety event may not be suitable for composting. Food that is unsafe due to a food safety event, foreign material, pathogens, or other unsafe condition must be destroyed and disposed in such a manner to provide certification of destruction. Composting is not typically adequate due to co-mingled with other materials. We would like to make sure that recalled food is also not a food waste under this bill.

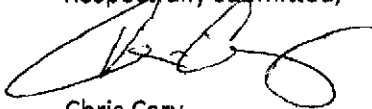
Fourth, Food Northwest has concerns with the bill language requiring reporting food waste weights to the Department of Environmental Quality (DEQ). Reporting of food waste amounts creates an undue burden on covered entities. Waste weights or volume are not typically measured precisely enough to allow for reporting. We strongly believe this is an unnecessary step for food processors if they are already complying with the composting requirements.

Fifth, the bill authorizes DEQ to annually issue "waivers" for the composting requirements under this bill. It is unclear how those waivers would be issued and what considerations DEQ will need to take into account in order to issue a waiver. This subsection needs more detail so covered entities understand when and how a waiver would be issued.

And finally, food date labelling should be implemented at the Federal level. State by state labelling requirements can create confusion to both consumers and for manufacturers. Putting a state specific labeling requirement could easily conflict with other state jurisdictions, putting an unnecessary burden on in-state food processors. It is worth noting that Federal FDA has been working on developing standards for food date labelling and it is best to allow FDA complete its evaluation of industry practices and needs, and to develop nationwide standards.

Thank you for your consideration.

Respectfully submitted,



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Policy Director
Food Northwest