



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. Tillamook County Creamery Association (TCCA) is a 116-year-old farmer-owned, and farmer-led cooperative, which is known for the quality of the products we produce and for our commitment to doing right by the land, our farmer families, and the communities in which we serve. As part of our commitment to Enduring Ecosystems, we take food waste seriously and are actively working to reduce it at every stage of our operations. We appreciate the intent behind HB 3018, and while we share the goal of minimizing food waste, we believe the bill could be refined to better reflect the work already being done and the realities of Oregon's waste management infrastructure.

TCCA has set ambitious goals, including achieving zero waste to landfill by 2030 under the True Zero Waste Protocols, and is also a participant in the World Resources Institute's 10x20x30 Food Loss and Waste Initiative, aiming to reduce food waste by 50% by 2030. Food waste reduction is not just an initiative but an integral part of daily operations.

Last year, we were the proud recipients of the 2024 Sustainable Oregon Award from the Association of Oregon Recyclers for preventing food waste from being landfilled at our facilities. In total, our broad set of diversion management strategies for food waste across our facilities prevented more than 2.6 million pounds of food waste from being landfilled in 2023 alone. This breaks down as 847,000 pounds diverted to feeding humans, 527,000 pounds diverted to feeding animals and 1.3 million pounds diverted to anaerobic digestion.



That said, operating facilities in rural Oregon presents unique challenges when it comes to waste diversion. Unlike urban areas with readily available infrastructure, TCCA must establish contractual agreements with facilities that are both geographically accessible and have sufficient capacity to accept diverted waste. A statewide composting mandate would significantly increase the volume of compostable material without fully assessing regional capacity constraints. To our knowledge, Tillamook County lacks a large-scale industrial composting facility, making compliance with such a requirement particularly difficult. While TCCA remains committed to reducing food waste and increasing diversion, comprehensive data on landfill composition at all locations is not yet available. Waste audits have been conducted at manufacturing sites, but a detailed breakdown of landfill waste from retail locations remains incomplete. Compliance with this bill would require additional resources to conduct thorough waste audits across all facilities, as well as secure access to appropriate composting infrastructure—both of which pose operational and logistical challenges for TCCA’s manufacturing and retail operations.

While HB 3018 seeks to address food waste, certain aspects of the bill could create unintended challenges for food processors and restaurateurs already managing waste responsibly. There is an opportunity to refine this legislation to support existing efforts while ensuring practical implementation:

Existing Efforts: Oregon’s food manufacturers and retailers have long engaged in food waste reduction through composting, anaerobic digestion, and diversion to animal feed. Before imposing new regulatory requirements, an assessment of current waste diversion practices would provide valuable insight. Understanding where food waste currently goes would help ensure that new regulations complement rather than disrupt ongoing work.

Capacity: Waste diversion requires adequate infrastructure, which is not always available in rural areas where TCCA operates. A statewide mandate could



unintentionally increase greenhouse gas emissions by necessitating long-distance transportation of food waste. A comprehensive review of composting, waste-to-energy, and feed diversion capacity should be undertaken before implementing statewide mandates to ensure feasibility.

Pilot Program: A statewide rollout of new food waste requirements may pose logistical challenges. Implementing a pilot program in areas with well-developed industrial composting infrastructure would allow businesses and policymakers to evaluate the effectiveness of the approach before expanding requirements statewide.

Definition of Food Waste: The bill's definition of "food waste" does not fully reflect the complexity of food processing. Many inedible by-products—such as shells, husks, bones, and wastewater residuals—are already managed responsibly through alternative methods, including anaerobic digestion and energy recovery. Clarifying exemptions for these materials would prevent unnecessary regulatory burdens.

Federal Labeling Consistency: State-specific food labeling requirements create confusion and compliance challenges for businesses serving customers nationwide. Congress and the FDA are actively working on national food date labeling standards, and Oregon should align with this federal effort rather than adopting independent requirements that could create additional burdens for food processors.

In closing, TCCA remains committed to environmental efforts and reducing our food waste, however before passing HB 3018 we request the legislature consider the work already being done, the realities of composting infrastructure, and the unintended consequences of a blanket mandate.

Thank you for your time and consideration.

Trevor Beltz
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