



September 8, 2015

The Honorable Thomas Vilsack  
Secretary of Agriculture  
U.S. Department of Agriculture  
Jamie L. Whitten Federal Building  
1400 Independence Avenue, S.W.  
Washington, DC 20250

The Honorable Gina McCarthy  
Administrator  
U.S. Environmental Protection Agency  
William Jefferson Clinton Federal Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Secretary Vilsack and Administrator McCarthy,

We are writing to comment on the effort of the Department of Agriculture and the Environmental Protection Agency to establish the first-ever national food waste reduction targets as part of the United Nations Sustainable Development Goals process. We would like to convey our strong support for the establishment of an ambitious 15-year national food waste reduction goal, along with benchmarks and implementation plans.

We recommend the establishment of a 50% food waste reduction goal by the year 2030. We believe that this goal, while ambitious, is doable for reasons outlined below. It is also in keeping with the goals being debated this month by countries around the world through the United Nations goal setting process and the 50% food waste diversion provision of Executive Order 13693.

Getting food from the farm to our fork eats up 10% of the total U.S. energy budget, uses 50% of U.S. land, and swallows 80% of all freshwater consumed in the nation. Yet 40% of food in the U.S. today goes uneaten. This not only means that Americans are throwing out the equivalent of \$162 billion each year, but also that uneaten food largely ends up rotting in landfills. Food waste is single largest component of disposed U.S. municipal solid waste, and accounts for a significant portion of U.S. methane emissions. Reducing food losses by just 15% would equate to enough food to provide the total diets of more than 25 million Americans every year. This is especially important given that food insecurity impacts one in six Americans, including 15 million children.

1) **Embracing an ambitious goal:**

We believe that a goal of reducing U.S. food waste by 50% by 2030 is appropriate and achievable for a number of reasons.

First, initial results from the “Rethink Food Waste Through Economics & Data” initiative (“ReFED”) indicate this could be possible. ReFED is currently developing a roadmap by which the U.S. food industry can significantly reduce, recover and recycle food that is going to waste. Modelled after the 2007 McKinsey Greenhouse Gas Abatement Cost Curve research, the research is assessing potential food waste reductions by the retail grocery, restaurant and institutional foodservice sectors.

Though preliminary and not yet vetted, initial results from the ReFED research are showing that these three sectors of the food industry could achieve a 25% - 30% reduction in food waste over the next 10 years. This figure is based only on those strategies that ReFED projects to have medium or high feasibility for implementation. The reductions do not assume any broad policy shifts.

Further, that projection is for only ten years and does not include strategies for reducing losses and waste on-farm and in the food processing sectors, or efforts to reduce in-home losses beyond educating consumers about food date labels. As a result, we feel it is possible to achieve a target of 50% using a fuller array of strategies. We would be happy to share more detailed information with your staff on how the data above has been calculated, as well as further projections that we expect will come out of the ReFED research in the coming months.

Second, other developed countries and the United Nations have proposed or embraced food waste reduction goals on a comparable scale, often with timeframes shorter than 2030. For example:

- The United Nations Environment Programme (UNEP) has proposed a 50% goal for reducing food waste by the year 2030 as part of the Sustainable Development Goals. This proposal will be voted upon in late September 2015 and marks the first comprehensive effort to establish such goals in countries around the globe.
- The European Commission is considering a goal of reducing food waste by at least 30% during the eight-year period ending 2025.
- The Consumer Goods Forum, representing 400 food retailers and manufacturers globally, has established the goal of reducing food waste through its industry members by 50% by 2025.
- The G20 Agriculture Ministers recently highlighted food loss and waste “as a global problem of enormous economic, environmental and societal significance” and have encouraged all G20 members to aggressively reduce food loss and waste, prioritizing waste prevention and food recovery for human consumption.

Lastly, on-the-ground activities around the U.S. and internationally are demonstrating that significant goals are achievable. For instance, in the United Kingdom, household-level food waste was reduced by 21% in just five years and the city of San Francisco diverts 80% of its municipal waste from landfill, including the collection of 350 tons per day of food waste for conversion into compost.

## 2) **Implementing the goal:**

In addition to committing to an ambitious goal, we encourage you to adopt specific benchmarks and metrics that focus not only on diverting wasted food from landfill and incineration but on reducing the amount of food that is wasted through expanding prevention efforts and recovery of edible food to assist people in need. Benchmarks should be established on the generation of edible versus inedible food to better distinguish the potential for donation of edible surplus foods. Measurable benchmarks specific to food waste prevention, food donation, use of food scraps as animal feed, composting, anaerobic digestion and other alternatives to landfill/incineration should be established.

In addition, we encourage you to take these steps to support successful implementation of the new goal:

- Develop a robust database of baseline data against which progress can be measured over time, including assessment of on-farm losses which are currently largely undocumented;
- Identify and support opportunities to enhance infrastructure for food recovery to better connect edible surplus foods with people in need;
- Support the development of infrastructure and markets for composting and anaerobic digestion, ensuring that organic materials diverted from landfill and incineration are used to create soil amendments and provide other environmental benefits;
- Encourage more accurate quantification of food waste by businesses and federal agencies through adoption of the *Food Loss & Waste Protocol and Reporting Standard* developed by the World Resources Institute in collaboration with the Consumer Goods Forum, Food and Agriculture Organization, Food Use for Social Innovation by Optimising Waste Prevention Strategies (FUSIONS), UNEP, World Business Council on Sustainable Development and Waste and Resources Action Programme (WRAP);
- Institute a process for documenting progress at the national level over the 15 year period, including bi-annual reports that are publicly available covering progress toward the overall national goal and related benchmarks including those related to food waste prevention and food donation, and;
- Create and lead a national implementation task force that includes a diverse array of stakeholders from the private sector, emergency food system, NGOs, agriculture, academia, government, and other relevant sectors. The task force could be charged with monitoring progress, supporting effective public reporting, raising visibility of the goals, recommending improvements in implementation, and identifying strategies for supportive government action.

We believe the time is right for an ambitious national food waste goal and robust implementation. We encourage you to take bold leadership in establishing this goal and we stand ready to lend our support to achieve its success on the ground. Please call upon us if we can be of assistance.

Sincerely,

Enid Borden  
President  
National Foundation to End Senior Hunger

Emily Broad Leib  
Director  
Food Law and Policy Clinic, Harvard Law School

Jason Clay  
Senior Vice President  
World Wildlife Fund

Mark Driscoll  
Head of Food  
Forum for the Future

Allen Hershkowitz, Ph.D.  
President  
Green Sports Alliance

Roni Neff, Ph.D.  
Assistant Professor, Environmental Health Services  
Johns Hopkins Bloomberg School of Public Health

Erik Olson  
Director, Health and Environment  
Natural Resources Defense Council

Rod Tyler  
President  
U.S. Composting Council

Cc:  
Ron Vance, EPA  
Elisa Golan, USDA