

# Congress of the United States

Washington, DC 20515

September 19, 2024

The Honorable Michael S. Regan  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Administrator Regan:

The undersigned Members of Congress are writing about your agency's recent actions that fail to recognize rendering as a critical food waste management strategy. We are concerned such an omission will create significant problems for agricultural producers and commercial establishments by preventing the conversion of recyclable organic materials into high-value, high-quality finished products.

Since its 1999 report entitled, "Waste Not, Want Not" (EPA 530-R-99-040), your agency has promulgated the "Food Recovery Hierarchy," an influential document that has shaped resource recovery efforts domestically and internationally. This simple graphic conveys that organics should be recycled to achieve their highest and best use. Historically, the graphic and the resource recovery strategies built around it, have taken a circumspect approach by prioritizing the conversion of otherwise wasted organics first into food, then energy and industrial products, and finally into nutrient-rich soil amendments before resorting to landfill disposal.

However, in 2023, the agency advanced a revised infographic, the "Wasted Food Scale", and released a (now-final<sup>1</sup>) National Strategy for Food Loss and Waste and Recycling Organics to inform recovery and recycling policy nationwide. The agency removed the rendering process from the infographic's rankings of food management methods and only included rendering in the larger report, but kept it out of the infographic. In addition, the agency committed to "promote and encourage state and local governments to adopt the new Wasted Food Scale" as part of the National Strategy.

Since the 1800s, rendering has handled the lion's share of recycled agricultural wastes. It is well known that rendering's finished products include animal feeds, but it is important to note that fats, oils, and greases recovered through rendering also serve as a valuable feedstock for our nation's advanced biofuels industry. These feedstocks also replace virgin oils in the production of many industrial products, including lubricants, paints, and varnishes. Other rendering by-products provide rich organic feedstocks that can be transformed in anaerobic digesters into biogas.

As many states face outbreaks of highly pathogenic avian influenza (HPAI) in poultry and dairy cattle, it's important to note that rendering also addresses food safety across the supply chain by safely destroying contaminated animals. During the rendering process, pressure and heat raise the temperature of the materials to approximately 245° to 290° F (115° to 145° C) for 40 to 90 minutes, while evaporating moisture and separating fat, protein, and bone. This process also kills bacteria, protozoa, parasitic organisms, and viruses, including highly pathogenic and low pathogenic avian influenza virus.<sup>2</sup>

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<sup>1</sup> <https://www.epa.gov/circulareconomy/national-strategy-reducing-food-loss-and-waste-and-recycling-organics>

<sup>2</sup> <https://www.govinfo.gov/content/pkg/GOVPUB-A101-PURL-gpo93585/pdf/GOVPUB-A101-PURL-gpo93585.pdf>

We believe the exclusion of rendering, and these important energy and industrial uses, from the Wasted Food Scale will significantly impair food and organic waste reduction efforts by confusing future local, state, and federal action.

We urge you to work with the Department of Agriculture (USDA) and the Food and Drug Administration (FDA) to revise the agency's Wasted Food Scale and its National Strategy for Reducing Food Loss and Waste and Recycling Organics to include the important role rendering plays in the critical processes of recycling agricultural and commercial organic wastes.

Respectfully,



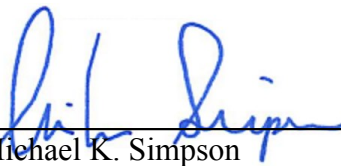
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Nicholas A. Langworthy  
Member of Congress



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Jim Costa  
Member of Congress



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Michael K. Simpson  
Member of Congress




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Austin Scott  
Member of Congress



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John Garamendi  
Member of Congress



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Adrian Smith  
Member of Congress



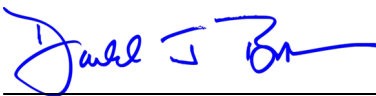
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David Rouzer  
Member of Congress



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Dusty Johnson  
Member of Congress



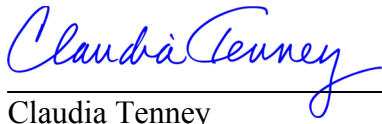
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Don Bacon  
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Claudia Tenney  
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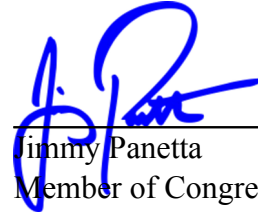
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Kat Cammack  
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Randy Feenstra  
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Jimmy Panetta  
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Young Kim  
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Tracey Mann  
Member of Congress



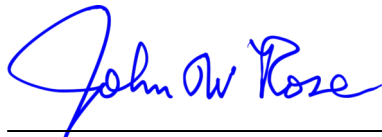
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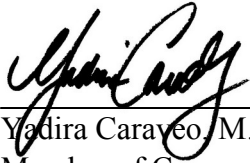
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