



February 2, 2024

Administrator Michael Regan  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics [Docket Number: EPA-HQ-OLEM-2022-0415-0001]**

Dear Mr. Regan:

The Sustainable Food Policy Alliance (SFPA), which includes global food companies Danone North America, Mars, Incorporated, Nestlé USA, and Unilever United States, is working to accelerate the pace of change in the food industry through individual company leadership and collaboration on policy solutions to issues facing our supply chain, employees, customers, and consumers. Together, we are pushing toward policy and other changes to minimize our respective impact on the environment, address the nutrition and food safety of our products, and lift up the people and communities in which we work.

At our core, we believe the food and agriculture value chain holds powerful solutions to address climate change, which we outlined in our guiding [Climate Policy Principles and Priorities](#). As leading food companies, SFPA members are working aggressively to reduce their environmental footprints and address the supply chain volatility created by climate change. Key to these efforts is a commitment to the circular economy across our products and packaging.

All four SFPA companies have made investments and commitments to reduce food loss and waste over time. But we know that our actions alone will not meet this global challenge and understand that durable and long-lasting solutions will require both thought leadership and action driven by the U.S. government. For that reason, we appreciate the cross-agency work by the Environmental Protection Agency (EPA), U.S. Department of Agriculture (USDA), and Food and Drug Administration (FDA) to highlight and address this issue in the Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics.

We are aligned with the broad goals outlined in the strategy: preventing the loss and waste of food and increasing recycling of food and other organic materials. Further, achieving these aims will lead to other benefits such as the reduction of greenhouse gas (GHG) emissions, economic savings, and community benefits. More specifically we support, and, in many cases, are already taking action to:

- Invest in additional research and new innovations to reduce food loss and waste;
- Improve collection and harvest techniques as well as establish a feedback mechanism for successes and challenges in adopting alternative uses for raw commodities and foods;
- Address leakage and spoilage in manufacturing and processing, storage, and distribution;
- Support policies that maximize the use of human grade ingredients to feed growing human and pet populations while utilizing non-human grade waste products for fuels;



- Increase consumer education and behavior change around food loss and waste in addition to community-based opportunities to recycle organics – and sharing learnings with key government and non-government partners;
- Consider the prevention of food loss and waste in packaging design and product labels;
- Support passage of federal food date labeling legislation to standardize and simplify food date labels in order to reduce consumer food waste at home;
- Partner with the public sector to find upstream solutions to consumer food waste;
- Grow access to organics recycling infrastructure across communities and improving current systems; and
- Support policies at the federal and state level that work toward a more circular economy.

We are grateful to have the opportunity to weigh in on the draft strategy and support a whole-of-government approach to this topic. We look forward to working with you to continue to progress toward a more circular economy and reduce food loss and waste.

Sincerely,

The Sustainable Food Policy Alliance