Institute of Food Technologists
525 W. Van Buren Street., Suite 1000
Chicago, IL 60607-3830 USA

+1.312.782.8424
+1.312.782.8348 Fax
ift.org

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RE: Comments on Docket No. EPA-HQ-OLEM-2022-0415 "Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics"

Submitted electronically at: https://www.federalregister.gov/documents/2023/12/05/2023-26574/draft-national-strategy-for-reducing-food-loss-and-waste-and-recycling-organics-request-for-public

Dear Environmental Protection Agency (EPA), U.S. Department of Agriculture (USDA), and Food and Drug Administration (FDA),

The Institute of Food Technologists (IFT) is thankful for the opportunity to provide comments on the *Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics*. IFT is a global organization of approximately 12,000 members who are committed to advancing the science of food. We believe science is essential to ensure the global food system is equitable, sustainable, safe, and nutritious.

IFT commends these organizations for working together to create a comprehensive strategy document that encompasses food waste and loss throughout the entire supply chain. Addressing the growing issue of food loss and waste through food science and technology is also a priority area for IFT and in November of 2022 we hosted a roundtable to discuss challenges, opportunities, and solutions that food science and technology can contribute to reducing food loss and waste. The outcomes of this roundtable are available in a white paper that can be found at: https://www.ift.org/-/media/policy-advocacy/files/fsts_improve_food_nutrition_security.pdf

Many of the key challenges and needs are similar to those identified by the draft strategy, including:

- Better measurement and target setting
- Food safety concerns
- Consumer acceptance and awareness
- Technological feasibility and scalability
- Communication and collaboration across the value chain
- Greater policy and investment efforts

In particular, we agree with the emphasis on consumer awareness and behavior change since most food waste in the US is at the retail/consumer level. When this food is wasted, all of the energy and water put into growing, harvesting, processing, and distributing the food is also lost, which is substantial. Thus, a focus of technologies should be on reducing consumer food waste.

Based on the key questions provided in the request for comments, the information below offers additional considerations that build upon the goals and objectives of the draft strategy.

What actions could help the US meet its goals that are not reflected in the draft?

- The stated goal of the draft strategy is comprehensive and covers several of the potential benefits, including supporting a circular economy, reduced GHG emissions, saving money, and cleaner, healthier communities. We suggest "improving food and nutrition security" should also be included in the stated goal of the strategy. Reducing food insecurity is mentioned frequently in the draft strategy and is one of the key benefits that can be realized through these efforts.
- Within Objective 1, Strategic Action B there is a mention of "upcycling food ingredients or products and processing byproducts into new foods for human consumption". We agree that investments in SBIR and STTR to support emerging technologies can help accelerate initiatives to valorize food loss. However, we also believe it is also important to identify and invest in technologies that can be scaled affordably and efficiently for larger scale impact and would suggest considering this within the strategy.
- Objective 2, Strategic Action E discusses identifying incentives to reduce food loss and waste and includes research on returns on investment. We would also suggest research on risk analysis, particularly as it relates to upcycling or valorizing food loss. There can be considerable risk in this area including food safety issues, inconsistent supply chains, and labeling and regulatory concerns. Efforts to understand and mitigate or reduce these risks could incentivize further investment into valorization of food loss.
- Collaboration with many partners will be necessary and the draft strategy highlights several ways the EPA, USDA, and FDA are collaborating with multiple stakeholders. We also encourage greater collaboration with nutrition and public health professionals, particularly as this relates to technologies discussed in objective 1B (e.g., novel food packaging materials, nanotechnology, physical or chemical modifications that may extend shelf-life or reduce pathogens). Often new technologies that are not well understood by consumers or health professionals can create concern that may lead to rejection of a useful and safe technology. By involving nutrition and health professionals early in the process, they may be better able to educate consumers on the benefits of new technologies.

What type of research should be funded?

- Many of the research initiatives listed in the draft strategy will be critical to future prevention of food loss and waste. We suggest the following additional research areas for consideration:
    - Establishing a systematic research approach to understanding how processing side streams can be used for value-added products to reduce food loss. There are multiple factors to consider when evaluating side streams for use as ingredients including food safety, physical properties, labeling, consumer acceptability, cost, availability, and sustainability. Developing a systematic approach to evaluating side streams could help food scientists and engineers determine the feasibility of using a side stream as a value-added ingredient. An example of this approach is the FFAR public-private partnership that is currently creating predictive models to evaluate the most promising underutilized crops for further investment. Development of predictive models for side streams could also enable identification of potential processing byproducts for future value-added ingredients.
    - Research should also ensure that initiatives to prevent food loss and waste provide more good than harm. For example, lifecycle analysis may determine that an initiative to mitigate food loss or waste may be more harmful to the environment than beneficial (e.g., transporting food loss or waste over long distances to be recycled may increase the carbon footprint). Research should consider the environmental, safety and nutritional impact of the entire lifecycle of the food.

What actions would result in more equitable outcomes for underserved and/or food insecure communities?

- Similar to the Farm Storage Facility Loan program that provides loans for farmers to obtain cold storage to preserve the shelf life of produce, this program could be extended to provide cold storage for food pantries that exist in rural, low resource, and food insecure communities.

IFT appreciates the opportunity to provide comments on the *Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics*. We believe food scientists and food science and technology solutions play a critical role in helping reduce food loss and waste and we support the EPA, USDA, and FDA in their coordinated efforts. We thank you for considering our comments. Please contact Anna Rosales, Senior Director Government Affairs and Nutrition (arosales@ift.org) if IFT may be of further assistance.

Sincerely,

Anna Rosales, RD
Senior Director, Nutrition and Government Affairs
Institute of Food Technologists