Greetings DEEP CCSMM, Please see attached comments and solutions in regards to food scraps.

Thank you, Nick Skeadas Curbside Compost <u>nick@curbcompost.org</u> contact: 914-646-6890



November 8, 2020

Recommendations to DEEP CCSMM to improve food scrap diversion in CT

Part A. Increase Compliance of Current Organics Law - Sec. 22a-226 Problem: Many waste generators who are covered by current CT organics law are not abiding. Update reporting to DEEP to improve compliance.

Solution

1. DEEP publishes and maintains list of all "Designated Food Scrap Generators (DFSGs)" who are located within 20 miles of an organics recycling facility. Each DFSG must report to DEEP annually how much, where their organic waste was processed and who transported it. If you are a DFSG and you are not source separating organics for recycling, DEEP must approve a temporary one year waiver.

2. Require transfer station operators to report source separated organics being tipped at transfer stations and going to incinerator/landfill to DEEP.

Part B. Help Pass Updated Organics Law.

Problem: Not enough food donation and food scrap composting happening across the state.

Solution

1. Remove 20 mile radius language from current law.

2. Require all DFSGs to separate excess food for donation.

3. Remove exclusions for DFSGs. Every generator, including university, school,

restaurant, office, healthcare facility, mall, that generates more than 1 ton per week of food scraps must first donate food and then separate for recycling.

4. Starting in 2022, reduce food scrap waste threshold from 1 ton to 0.5 ton per week.

5. Starting in 2023, ban all food scraps from landfill/incinerator statewide.

Thank you, Nick Skeadas Curbside Compost nick@curbcompost.org Contact: 914-646-6890