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Int. No. 1162 - In relation to commercial organic waste

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Committee on Sanitation and Solid Waste Management

Good morning Chairperson James and Committee on Sanitation and Solid Waste Management. My name is Matt de la Houssaye, and I am the Director for Global Green USA's Coalition for Resource Recovery. Founded in 1994, Global Green is a national environmental non-profit organization that is the US affiliate of Green Cross International - one of 31 affiliates globally. Global Green works with members of its Coalition for Resource Recovery to pilot and implement food packaging and food waste recovery systems. We have worked with New York City restaurants such as Pret A Manger and Jamba Juice on their food waste composting programs, and served as a technical advisor on the [NYC Mayor's Food Waste Challenge](#) in which over 100 restaurant locations committed to reduce food waste by 50% or more, and the [NYC BigApps](#) competition in which we advised developers of apps on how to match their applications to address challenges with food waste recovery.

Since 2010, Global Green has hosted 4 food waste conferences in New York City with participation from industry, government, and non-profit leaders – including the 6 regional food waste processing facilities within a 130 mile radius of New York City. The most recent of these was one week after Hurricane Sandy. Despite the conditions, the event featured participation from the states of Connecticut, New Jersey, Massachusetts and New York.

Why is this important? What's the impact of food waste recovery?

Let's look at climate change.

Let's say a New York City grocery store had one of its employees commute across the entire eastern seaboard from Miami to New York City and back each day. Aside from the fact that you would need 48 hour days for this to make sense, that's over 1200 miles each way, and the grocery store would save almost one ton of CO₂ per day if that employee moved to NYC. Composting one ton of food waste will actually save more carbon than having that employee walk to work instead of driving from Miami.¹

Composting is one of the best things businesses can do for mitigating climate change. It makes a long "drive" for the environment. If passed, this law is expected to divert hundreds of thousands of tons – a huge positive climate impact.

What about resiliency?

Compost can be used for our farms, roadways, and landscapes. Soil containing compost absorbs water. By incorporating compost into landscaping and storm-water management, runoff

¹ It would take 1277 miles to drive from New York to Miami each way, or a total of 2554 miles. Assuming the car uses 25.7 miles per gallon (source: [National Highway Safety Administration CAFE Standard, 2013](#)), then a total of 99.4 gallons are used (2554/25.7). Using US EPA estimates, each gallon of gas produces 19.59 lbs. of CO₂ (derived from [US EPA, 2011](#)). In all, the entire trip produces 1946 lbs. of CO₂. By comparison, using the [US EPA WARM model](#), landfilling one short ton (2,000 lbs.) of food waste produces on net 0.89 metric tons (1,959 lbs.) of CO₂ equivalent emissions.

can be reduced due to improved water holding capacity, healthy plant life, and increased infiltration to the soil.

To put this in perspective, many people may think of New York as a place of concrete; however, we have 1700 acres of Department of Transportation-managed land. According to staff at Arterial Roadway Repair and Maintenance, much of these 1700 acres of in-city DOT land could benefit from absorbing large amounts of compost as a means of improving the long-term health of the landscapes. To give you an illustration of the magnitude of compost that could be applied locally, this land alone could absorb as much as 200,000 tons of compost per year –or 60-80% of the food waste that would be recovered by this law.²³

What about the economics of the law?

Our industry market research⁴ has shown that two important factors for reducing the cost of food waste recovery are 1) increasing collection route density and 2) collecting a large amount of organics with each stop. The proposed law addresses both of these areas. By covering large generators, the law focuses on programs that will have the least amount of truck trips for a large amount collected. Furthermore, by mandating that more businesses participate in composting and food waste recovery programs, this law will increase the route density of food waste collection routes allowing more food waste to be picked with each truck route. This makes the overall system cost go down.

With regard to economics and food waste, it is important to take into account the big picture. In our conversations with national grocery chain operators we've found that many have experienced cost reductions after starting composting and food donation programs. Once food waste is separated, it is tracked. Once it is tracked, it is easier to target the food waste that doesn't need to be purchased in the first place. Assuming a conservative food purchase cost of \$1 a pound, then through better inventory management and other "source reduction" means, businesses can save *\$2,000 per ton or more*. To put this in perspective, the maximum amount NYC haulers can charge according to BIC rules is only one tenth of that amount - \$208 per ton. Source reduction of food waste will always be the best economic option.⁵

New York City is not alone.

Much of Europe has banned food waste from landfills. Closer to home, last November Global Green hosted a conference on food waste recovery here in New York City with a panel that featured presentations by Massachusetts DEP and Connecticut DEEP on their food waste diversion programs.⁶ Both states have passed laws or regulations mandating that large generators of food waste recover food waste. One of the challenges with the programs in Connecticut and Massachusetts has been defining who is mandated under their programs.

² Roughly half of NYC DOT's 1716 acres of landscapes is lawns and half is woodlands. For woodlands, 2" of compost, and for lawns 1" of compost, could be applied annually. Using estimates from Massachusetts Department of Environmental Protection, we assumed that each 2 inches of compost adds a weight of 8.1 pounds per square foot. Using these values for weight and the compost application, a total of 227,000 tons of finished compost could theoretically be applied per year on our DOT landscapes. These numbers are provided as an illustration of the magnitude of compost that could be applied locally. Application rates need to be evaluated for each project to match the applicable soil type and characteristics.

³ For more on resiliency and storm debris please see [our testimony](#) to City Council on February 28, 2013.

⁴ Global Green USA. [Economics of New York City Commercial MSW Collection & Disposal and Source-Separated Food Waste Collection & Composting: Opportunities to Reduce Costs of Food Waste Recollection & Recovery.](#)

⁵ Global Green USA - [Guiding Principles For Recovering Value From Commercial Food Waste.](#)

⁶ Global Green USA. November 20, 2012. [Conference Report: Northeast Leaders & Food Waste Recovery](#)

These two programs have a threshold in “tons per day.” We’d like to commend New York City for its innovative approach to this legislation by using a square footage amount. This can potentially simplify questions regarding who is covered.

New York City is not alone, and the programs in Connecticut and Massachusetts have already seen success even before their official implementation dates start. For example, since the announcement of the Connecticut food waste diversion law, the State’s largest “waste to energy” company announced a partnership with an anaerobic digestion company for turning food waste into biogas and compost.⁷

To quote Diane Duva, Connecticut Department of Energy and Environmental Protection who has helped administer this program:

This law helps the Connecticut food industry, a large and vital part of Connecticut’s economy, to save money in disposal costs, and it will help generate new economic development in organics recycling. It will help keep a resource out of our waste stream and into the stream of commerce where it belongs.

That statement really says it all. We support New York City joining the regional movement toward greater food waste recovery. On behalf of Global Green we’d like to commend you for your leadership and wisdom for introducing this law and holding this hearing.

⁷ This accounts for three of the six “waste to energy” facilities in Connecticut that receive over 50% of the waste in the State that is not recycled.