

## **Response to Oregon Composters**

We respect composters' decisions as private businesses to choose what feedstocks to accept, but please don't disparage companies and communities actively engaged in successful diversion programs using compostable packaging and foodservice products.

The composting industry across the U.S. is made up of thousands of facilities, processing millions of tons of yard trimmings, biosolids, manure and food waste annually. Each of these facilities is turning those organic materials into nutrient-rich compost for agriculture, nurseries, landscaping businesses and home gardens. We agree that quality compost products develop healthier and more resilient soil, reduce greenhouse gas emissions, recycle nutrients, conserve water, and reduce the use of synthetic fertilizers, pesticides and herbicides.

Twenty years ago, the US Composting Council (USCC) and Biodegradable Products Institute (BPI) saw the need for a certification to verify which products and packaging would break down in professionally managed facilities; facilities that wanted to accept these materials to support the businesses and communities looking to divert more organics from disposal. Increasing diversion of food waste, in particular, has been the primary driver in the development and use of compostable packaging, since food is the number one category being disposed of in the US, and when landfilled is a significant contributor to greenhouse gas emissions.

At no point has the USCC, BPI, or another organization required compost manufacturers to accept these items. It is the right of each facility to make that decision. However, organizing an effort to deride and condemn the efforts of those that do accept compostable packaging, under the premise that it limits the environmental benefits of composting, is factually incorrect and detrimental to the composting industry. The Oregon Composter letter<sup>1</sup> has already been used in other states to combat legislative efforts that would benefit the composting industry, fueling a debate based on misinformation rather than collectively working on solutions.

### **Here are the reasons we dispute the nine accusations outlined in your letter:**

- 1 Compostable products not always breaking down:** There is a well-established product certification program in the U.S. for compostable packaging, which requires several internationally recognized tests, which confirm that products are consumed by microbial action. These tests cover the physical/visual break down of an item, bioaccumulation in soil,

---

<sup>1</sup>[https://static1.squarespace.com/static/5a7a30710abd046ac76433a4/t/5c786b9b6e9a7f493fd62185/1551395742210/compostable\\_packaging\\_and\\_serviceware.pdf](https://static1.squarespace.com/static/5a7a30710abd046ac76433a4/t/5c786b9b6e9a7f493fd62185/1551395742210/compostable_packaging_and_serviceware.pdf)

plant toxicity, heavy metals, etc. Without this certification it would be the Wild West. Because compost manufacturing processes vary tremendously from location to location, there is a wide range of conditions (technology, feedstocks, climate, time, temperature, moisture, pH, etc.) that compostable materials will be subject to. That is why certification testing must be done in a lab under uniform conditions. Just like with any feedstock a composter plans to accept, there are considerations for what processing conditions and equipment will be needed to successfully handle those materials. Additionally, there are multiple initiatives available to help facilities do field testing to check what will work for them.<sup>2</sup>

**2** Contamination: Contamination is an issue for most feedstocks, yard debris, manures and food wastes included, but it is particularly an issue for facilities that accept post-consumer food waste. We all want to limit contamination, but it is misplaced to blame compostable packaging, especially because compostable packaging has been shown to reduce contamination.<sup>3</sup> This is a solvable problem, such as through the efforts underway in states to require improved labeling so that compostable products are “readily and easily identifiable”, which BPI supports and has been actively engaged on.<sup>4</sup> However, the Oregon Composter letter has already been used in public testimony to fight efforts that would help limit contamination in organics programs.

**3** Resale quality/value: It is not compostable packaging that is hurting resale quality, it’s contamination from conventional products.<sup>5</sup> Compostable packaging is successfully broken down at dozens of facilities and doesn’t have to mean compromising quality of the finished compost. We all support practices to produce finished compost that is not contaminated, and a growing number of facilities around the country are able to both accept compostable packaging AND sell high quality compost.

**4** Organic Agriculture: It is true that compost that intentionally includes compostable packaging today cannot be sold to certified Organic farms. However, this is not a flaw of compostable packaging. It is a National Organic Program rule that anything “synthetic” be petitioned to be added to the National List. BPI hired consultants to help develop such a petition, with the intent of filing it in 2019. Ironically, defamatory efforts like this one from Oregon will make it more challenging to get the petition approved. Do Oregon composters want to support this change and be part of the solution, or be a barrier? In the meantime, composters who wish to sell to that market can keep separate piles with and without approved materials.

---

<sup>2</sup> <https://www.compostfoundation.org/FieldTesting>

<sup>3</sup> [https://bpiworld.org/resources/Documents/NatureWorks\\_UW\\_Study\\_FINAL.pdf](https://bpiworld.org/resources/Documents/NatureWorks_UW_Study_FINAL.pdf)

<sup>4</sup> <http://lawfilesexxt.leg.wa.gov/biennium/2019-20/Pdf/Bills/House%20Bills/1569-S.E.pdf>

<sup>5</sup> <https://bpiworld.org/bpi-portland-overs-study>

- 5** Risks to Human and Environmental Health: Many feedstocks that composters accept have potential risks to human and environmental health, because they are in the organic waste streams that composting facilities are paid to receive. Some, like pathogens, are destroyed via the very nature of composting being a transformative process. Others, like persistent herbicides, require action upstream. Fluorinated chemicals like PFAS are used in a variety of products like rain gear, firefighting foam, furniture, and cell phones. In foodservice items the fluorinated chemicals used are FDA approved and provide a grease barrier. Most of today's compostable packaging gets a grease barrier from biopolymers and does not use fluorinated chemicals. But as soon as BPI became aware of the concerns and risks of fluorinated chemicals to composters, we took action by participating in high level working groups, hiring experts and passing a first of its kind resolution to be a leader and require testing to restrict and eliminate these ingredients. This has been, and continues to be, a massive undertaking to support composters and the environment.<sup>6</sup>
- 6** Compostables Not Adding Value: It's an out of date assumption that compostable packaging doesn't provide any value to the composting process. A study last year conducted at two full-scale composting facilities evaluated impact on the composting process (e.g., C:N ratio, bulk density, etc.) and quality of the finished compost (e.g., nutrient value, heavy metals, etc.). The results were very positive, showing that on all factors evaluated, the compostable packaging provided the same benefit as traditional bulking materials such as yard trimmings.<sup>7</sup>
- 7** Not Better Compared to Conventional Plastic: Compostability is one of the key attributes composters need to consider when deciding what to allow in their facilities. In no situation are non-compostable products and packaging more beneficial to a composter. We know and support the zero waste hierarchy of reduce, reuse, recycle/compost, prioritizing the first two. In some instances, reusables are not currently an option, and businesses must decide to have a program with compostables, or no program at all. The OR DEQ literature review did not sufficiently address the full benefits of compost use<sup>8,9</sup> or the ability of compostable packaging to increase food waste capture rates.<sup>10,11,12</sup>
- 8** Recycling is Better than Composting: We support recycling too, and don't see it as a competition for feedstocks between recyclers and composters. Recycling rates for many

<sup>6</sup> <https://www.biocycle.net/2018/12/14/bpi-addresses-claims-toxic-chemicals-compostable-products>

<sup>7</sup> [https://bpiworld.org/resources/Documents/Field\\_Study\\_Packaging\\_as\\_Facility\\_Feedstock.pdf](https://bpiworld.org/resources/Documents/Field_Study_Packaging_as_Facility_Feedstock.pdf)

<sup>8</sup> <https://compostingcouncil.org/compost-and-its-benefits-download>

<sup>9</sup> <https://www.waste360.com/print/44078>

<sup>10</sup> <https://www.biocycle.net/2016/08/15/compostable-products-postconsumer-food-scrap>

<sup>11</sup> <https://s3.amazonaws.com/gb.assets/Value+of+Compostable+Packaging+Report.pdf>

<sup>12</sup> [https://bpiworld.org/resources/Documents/NatureWorks\\_UW\\_Study\\_FINAL.pdf](https://bpiworld.org/resources/Documents/NatureWorks_UW_Study_FINAL.pdf)



packaging items are incredibly low, so let's focus on getting those items out of the landfill. It just so happens that the food-soiled items that are a challenge to recycle are great candidates for including with food waste collected and sent to composting facilities. Clean and dry paper and plastic items that have strong commodity markets should absolutely be recycled first if that is an option.

9 Too expensive: Compostable items are not always more expensive than non-compostable alternatives, and even when they do cost more, it is of value to the composters accepting them – we do not want non-compostable items in our facilities, even if they cost less.

We acknowledge that not all composting facilities want to accept compostable packaging, and that is their decision. But please stop making the judgement call for the rest of us who are working collaboratively on finding ways to have successful zero waste programs.<sup>13</sup> We feel that composters and manufacturers of compostable packaging are on the same team, and that we are stronger when we work together. Consider joining us as part of the solution.

---

<sup>13</sup> <https://www.biocycle.net/2019/03/11/commentary-zero-waste-requires-visionary-thinking>