



February 2, 2024

To the Environmental Protection Agency committee on drafting a National Strategy for Reducing Food Loss and Waste:

Thank you for the opportunity to share comments aimed at shaping the content of the National Strategy to Reduce Food Loss and Waste. For nearly fifty years, The Greater Boston Food Bank has been driven by the core belief that we have the power to end hunger in Eastern Massachusetts. The work that we do to distribute over 90 million pounds of food across our community annually has given us deep experience as a leader in preventing food loss and waste in Eastern Massachusetts. Empowering our neighbors to put food on their tables wouldn't be possible without decades-old relationships with retailers, vendors, and distributors of all sizes, locally and nationally. With too many people struggling to keep food on their tables, the National Strategy to Reduce Food Loss and Waste, informed by the expertise of food banks, is a critical opportunity to simultaneously to advance food security for millions of Americans. We applaud the administration for incorporating elements of the National Strategy on Hunger Nutrition, and Health into this draft.

About The Greater Boston Food Bank and Eastern Massachusetts Network

The Greater Boston Food Bank (GBFB) is the largest hunger-relief organization in New England and among the largest food banks in the country. GBFB operates in the nine counties of Eastern Massachusetts, encompassing 190 cities and towns. As the food bank feeding Eastern Massachusetts, GBFB distributes the equivalent of nearly 100 million healthy meals annually through a network of 600 dedicated food distribution community partners, including food pantries, homeless shelters, human services organizations, and mobile markets at K-12 schools, colleges, community health centers, and senior centers. GBFB also has a Nutrition Team which provides nutrition education and programming as well as SNAP Outreach and application assistance.

A member of the national Feeding America network, GBFB's mission is to end hunger here. We remain committed to the belief that access to healthy food is a basic human right regardless of an individual's circumstances and that we have the collective power to solve hunger. Through policy, partnerships, and providing free, nutritious, and culturally responsive food, GBFB is committed to addressing the root causes of food insecurity while promoting racial, gender, and economic equity in food access.

Since early 2020, the number of individuals that GBFB food distribution partners report serving each month rose to over 600,000, which is 120% more people seeking help than pre-pandemic. The state of hunger has grown in the Commonwealth due to the economic impact of the COVID-19 pandemic and the

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already existing disparities among our most vulnerable citizens. The third annual edition of our statewide report published by GBFB, “Opportunities to Improve Food Equity and Access in Massachusetts,” indicates that as many as one in three people in Massachusetts experienced food insecurity at some point in 2022.

About The Greater Boston Food Bank’s Food Recovery Program

GBFB plays an important role in brokering relationships between food waste generators and our network of agency partners across Eastern Massachusetts. Our Retail Food Recovery Program, led by our Food Acquisition team on behalf of our 600 partner agencies, coordinates and connects our food pantries to grocery stores, farms, manufacturers, and food drives to arrange pickups or drop-offs of donated food that otherwise could have gone to waste. Eastern Massachusetts is home to several food recovery organizations, and GBFB maintains strong relationships with these stakeholders as we work toward reducing food waste and feeding our neighbors.

In our 2023 fiscal year, GBFB facilitated 25 million pounds of donated food throughout Eastern MA, the equivalent of 20.7 million meals. Some of this food is recovered from retail stores and picked up directly by GBFB partner agencies, instead of going through GBFB’s distribution center in Boston, to reduce time from donation to distribution. When appropriate, GBFB facilitates drop-off of surplus food directly from the donor or from a local food recovery organization to a partner agency.

Policy and Programmatic Recommendations

- **Expand grants for capacity building with reduced administrative burden.** We are heartened that USDA and EPA will continue to help expand the food donation infrastructure and support research, capacity building, and extension projects that improve and innovate food donation channels, including FSA’s Farm Storage Facility Loan Program, the Rural Development’s Community Facilities & Rural Energy for America Program (REAP) loan and grant programs, and Farm to Food Bank grants. However, we would recommend decreasing the administrative burden of the proposed Farm to Food Bank grant and increasing reimbursement rate, as procuring rescued food through this program is comparable to purchasing directly from suppliers and requires significant reporting requirements. Many of our agency partners are interested in accepting more food, and the need is certainly high. However, a lack of storage capacity for perishable product and hot meals mean that more capital investment is necessary before agencies can absorb more product.
- **Continue to create guidance around date labeling.** The lack of standardization around date labeling results in food waste at the pantry and household levels. Our partner food pantries that distribute rescued food are often provided with inconsistent guidelines around dates and labels from local and state boards of health. This inconsistency often results in the disposal of perfectly wholesome surplus food or passing mixed messages along to clients. GBFB’s Nutrition team is extremely attentive to food safety concerns around food expiration and works closely with our partner food pantries to empower them with food safety knowledge and the tools to interpret date labeling, yet this challenge persists. We encourage USDA to continue to create guidance around date labeling that focuses on food safety and launch educational materials and awareness campaigns around dating and food safety in coordination with state agencies, when possible.

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- **Establish awareness and guidance about liability protections, and incentives for donation.** Larger retailers are often aware of how the Bill Emerson Act protects them from donating in good faith, but smaller retailers may not be as willing to donate due to misconceptions around liability concerns, reducing their propensity to participate in donation programs. Expanding incentives for donation would result in more food that GBFB can distribute to our neighbors in need. Since 2022, commercial food material disposal above 1,000 pounds per week has been banned in the Bay State. As retailers, restaurants, vendors, and distributors in our state are already complying with the Commonwealth's strict limits, we hope that Massachusetts' experience can be a national model in reducing food waste and food insecurity hand in hand. We applaud this strategy for seeking to further incentivize donation with tax benefits.

Food banks across the country have a critical role in reducing food waste and improving food equity and access, and GBFB's knowledge and expertise makes us a national leader. Hunger, as the Administration knows, is not an issue of a lack of food but instead inequitable distribution. We appreciate the Biden-Harris Administration's dedication to addressing climate and food insecurity through the National Strategy on Hunger, Nutrition, and Health, as well as through this National Strategy on Food Waste. Through supporting food banks and our network of partner agencies serving Americans every day, the Administration can provide needed poverty relief and nutritional investments while also diverting good, healthy food from going to waste.

Sincerely,



Catherine D'Amato
President and CEO
The Greater Boston Food Bank