



August 27, 2024

The Honorable Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information for the Proposed Low Carbon Fuel Standard Amendments

Dear Chair Randolph,

The Resource Recovery Coalition of California (RRCC) is grateful for the opportunity to provide comments on the proposed LCFS amendments. RRCC represents waste and recycling haulers, processors and composters who support the LCFS and have significantly reduced their emissions by utilizing low carbon fuels in their vehicles and programs. We along with many other stakeholders strongly support more stringent carbon reduction targets, including a more aggressive target in 2025. However, we are concerned that the proposed definition of “food scraps” is advertantly restrictive and would impede progress in achieving our organic diversion targets under SB 1383.

As proposed, the definition of “food scraps” would exclude many sources and forms of food scraps. We urge CARB to define “food scraps” as follows.

“Food scraps” is the portion of municipal solid waste (MSW) that consists of inedible or post-consumer food collected from locations which include, but are not limited to, residences, **commercial and industrial enterprises**, hospitality facilities, institutions and grocery stores. Feedstocks that are **source separated at the point of generation and that are** not typically landfilled do not qualify as Food Scraps, which include: fats, oils, or greases (FOG), liquids at the point of collection, and materials from industrial food manufacturing and distribution facilities **that can be used as animal feed, as set forth in Chapter 6 of Food and Agricultural Code (FAC), commencing with Section 14901 et. seq and Title 3, Division 4, Chapter 2, Subchapter 2 commencing with Article 1, Section 2675 of the Code of California Regulations.”**

You might also consider a simpler definition, as follows.

“Food Scraps” is the portion of municipal solid waste that consist of inedible, post-consumer or production food wastes that would otherwise be landfilled.



RESOURCE RECOVERY COALITION OF CALIFORNIA

We also note that the proposed amendments include a definition for “recovered organics” that does not appear to be used anywhere else in the proposed regulation. We ask that CARB clarify how this definition is intended to be utilized in the regulation. The following definition of “recovered organics,” if necessary, would more accurately represent the manner in which organic waste is recovered from the waste stream.

“Recovered Organics” is the organic fraction of ***mixed*** municipal solid waste that is ***source separated at the point of generation or otherwise*** manually or mechanically separated from the waste stream, typically at a materials recovery facility, ***anaerobic digestion facility, compost facility***, or transfer station.

Thank you for your consideration of our comments. Should you have any questions, please do not hesitate to reach out.

Sincerely,

Veronica Pardo
RRCC Executive Director