

May 8, 2024

The Honorable Michael Regan  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20460

The Honorable Thomas J. Vilsack  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue SW  
Washington, DC 20250

The Honorable Robert M. Califf, M.D.  
Commissioner  
U.S. Food and Drug Administration  
10903 New Hampshire Ave  
Silver Spring, MD 20903

Dear Administrator Regan, Secretary Vilsack, and Commissioner Califf:

We write to you regarding the omission of rendering from the Administration’s Draft National Strategy for Reducing Food Loss and Waste and Recycling Organics (“Draft Strategy”).

Last December, the Environmental Protection Agency (EPA), the U.S. Department of Agriculture (USDA) and the Food and Drug Administration (FDA) released a Draft Strategy that excluded the important role of rendering – a sector which has reduced our nation’s food waste since the late 1800s.

Since the 1990s, rendering has been included in EPA’s ranking of food waste management strategies, previously called the Food Recovery Hierarchy. However, rendering was the only technology specifically removed from the EPA’s rankings with no scientific evidence driving the change. The U.S. rendering industry recycles 99% of unwanted and leftover animal materials considered inedible. Annually, renderers divert over 54 billion pounds<sup>1</sup> of raw materials from landfills and transform them into ingredients for dozens of products including biofuels, pet food, and organic fertilizer. According to the North American Renderers Association’s estimations<sup>2</sup>, our nation’s landfills would reach capacity in four years without a rendering sector that can help address these wastes.

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<sup>1</sup> USDA, After Action Report: Rendering Workshop, July 2017;  
<https://www.aphis.usda.gov/sites/default/files/rendering-report.pdf>.

<sup>2</sup> Anna D Wilkinson and David L Meeker, “How Agricultural Rendering Supports Sustainability and Assists Livestock’s Ability to Contribute More than Just Food,” *Animal Frontiers* 11, no. 2 (March 1, 2021): 24–34,  
<https://doi.org/10.1093/af/vfab002>.

As stated in the Strategy, "...EPA, USDA, and FDA seek to highlight opportunities to use raw materials more efficiently, enable those resources to be used for their highest value, and recover valuable resources from discarded materials." This is exactly rendering's role. However, we are concerned that this draft strategy, with rendering omitted, will not accelerate progress towards the 2015 national goal to reduce food loss and waste by 50% by 2030. Instead, the strategy will only serve to incentivize other recycling technologies at the expense of the rendering industry. Moving a supply stream from one organic recycler to another should not be counted as progress towards our goals. Instead, progress must be measured employing sound science and using all appropriate tools at our disposal. If the agencies believe there are research or data gaps on the role of rendering in food waste reduction, the national strategy presents the perfect opportunity to explore and fill these deficiencies for the sake of reaching our national goal by 2030.

For centuries, rendering has been at the forefront of a circular economy. We urge EPA, USDA, and FDA to ensure that rendering is included as part of our nation's food loss and waste reduction strategy. In addition, we request that EPA update its Wasted Food Scale to reflect the importance of rendering as a management strategy for wasted food.


Thank you for your attention to this important matter.

Sincerely,



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Roger Marshall, M.D.  
United States Senator



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Michael Bennet  
United States Senator



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Jerry Moran  
United States Senator



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Amy Klobuchar  
United States Senator



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John Boozman  
United States Senator



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Debbie Stabenow  
United States Senator



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Alex Padilla  
United States Senator



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Tina Smith  
United States Senator