



Assembly Roundtable: Expanding Access to Composting Food Scraps

September 19, 2023

The Northeast Organic Farming Association of New York (NOFA-NY) applauds the Assembly's efforts to enable the expansion of food scraps composting and is grateful for this opportunity to comment. Our comments will cover reducing contaminants and opportunities for generating compost approved for organic use. Expanding access to food scrap composting is not only essential for reducing emissions associated with sending our food scraps to landfills or incinerators, composting can also generate a valuable soil amendment for farmers and gardeners. Producing compost approved for use in organic farming and gardening can dually incentivize the adoption and expansion of USDA-certified organic agriculture, a fundamentally climate-friendly system of food, feed and fiber production. However, municipal composting programs must have stringent processes in place to not only minimize emissions but also to ensure that contaminants, including forever chemicals (per- and polyfluoroalkyl substances (PFAS)) and microplastics, aren't being concentrated in compost to the detriment of human and ecosystem health.

Founded in 1983, the Northeast Organic Farming Association of New York is the premier statewide organization growing a strong organic agriculture movement in New York State. NOFA-NY provides education and assistance to organic farmers and gardeners; connects consumers with organic farmers; advocates policies that support a sustainable and fair food and farm system; and is the largest USDA-accredited organic certifier in New York, certifying over 1,000 organic operations.

By the nature of accepting food scraps from multiple sources, municipal composting is particularly at risk of contamination and of inadvertently spreading contamination to those utilizing the compost as a soil amendment. Two widespread and largely under-researched contaminants are per- and polyfluoroalkyl substances (PFAS) and microplastics.

PFAS enter the waste stream in multiple ways including from products containing PFAS chemicals such as household products, personal care packaging, and food packaging. They

persist in the environment, earning the nickname “forever chemicals” and exposure has been linked to [numerous human health impacts](#) including reproductive and developmental effects, increased risks of some cancers, reduced immune response, hormone interference, and increased cholesterol levels.

Microplastics can also enter the waste stream from food packaging and while not studied much in the U.S. have been [found in Europe and Asia to be abundant in food waste and compost](#). Microplastics in compost used as a soil amendment can be harmful to overall soil health, adversely impacting microbial communities, plant health, and they bioaccumulate in organisms higher in the food chain. While the impacts of microplastic ingestion on human health are not well understood, the World Health Organization (WHO) [recommends](#) taking measures to mitigate exposure.

Public health and environmental stewardship must remain central to the goals of composting policies and programs; therefore measures must be taken to minimize exposure to contaminants by keeping waste streams separated. Food and yard waste should remain separate from raw manure, biosolids, and other feedstocks to avoid cross-contamination and to avoid diminishing the value of composted food waste. We also strongly discourage the use of co-digestion facilities that process food scraps and other feedstocks simultaneously through anaerobic digestion. The resulting digestate can include concentrated levels of contaminants, making the digestate unsuitable as a soil amendment and reducing the value of otherwise nutrient-rich compost.

Compost approved for organic use is in high demand by certified organic farmers, and farmers and gardeners seeking a safe and nutrient-rich soil amendment. Municipal and community composting programs can benefit from the demand for compost approved for organic use by following the compost standards detailed in the National Organic Program’s [guidance on allowed](#) practices for composition, production, and use of compost in organic crop production. By helping to meet market demand for this important organic input, composting programs can not only charge a premium but can also help encourage the adoption and expansion of climate-friendly organic production systems that increase food system resilience, capture more carbon, and release fewer greenhouse gasses compared to conventional systems, bringing us closer to meeting our emissions reduction goals.

In addition to significant upstream reductions in plastic and PFAS exposure, including manufacturing bans and expanded recycling programming, New York State has a responsibility to put in place policies that protect against exposure to contaminants, including through municipal and community composting programs. NOFA-NY encourages the Assembly to adopt policies that protect human and environmental health and enable the creation of a nutrient rich compost that will contribute to thriving local food systems.