



**US Composting
Council®**

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The US Composting Council (USCC) advances compost manufacturing and promotes compost use to enhance soils and provide economic and environmental benefits for our members and society.

The USCC believes that the recycling of organic materials is central to achieving healthy soils, clean water and a sustainable society. We work to achieve this vision by educating professionals, policy-makers and the public, serving as an advocate to promote compost manufacturing, encouraging and promoting research and the adoption of best management practices.

National SMM Plan Recommendations

The focus of this paper is the manufacturing of compost from organic residuals. Organic residuals (e.g., yard trimmings, manure, food scraps, biosolids, etc.) represent a challenge and an opportunity for national recycling efforts. The inherent handling and processing challenges must be overcome from the point of generation, through transportation to a compost manufacturer, during the compost manufacturing process and in the disposition and use of the resulting compost products. We have four main areas of recommendations.

First and foremost, state governments must adopt “compost-friendly” policies that dually encourage recovery of organic materials and allow for the creation and expansion of facilities to process these materials into valuable products. While there is positive momentum behind organics recovery programs – specifically, food scrap collection – there remain many state and local policies that uphold the traditional solid waste disposal paradigm. **Recommendation:** Policies that will support the growth of local infrastructure are needed. On the facility side, these could include grants, low-interest loans, tax incentives, enterprise zones, and others. On the product demand side, policies such as purchasing preferences, minimum organic matter standards for post-construction soils, and general “green infrastructure” support, will provide profitable outlets for the sale of compost-based products. Tools and resources such as the USCC’s “Model Compost Regulation Template”, which has recently been adopted by a number of states, and the CCREF’s Toolkits on Compostable Plastics and Curb-to-Compost could be leveraged.

A related challenge is a strong need for regulatory consistency for identical feedstocks. Organic residuals are generally treated as solid waste, rather than product feedstocks by most state regulatory agencies. Compost manufacturing facility permitting, infrastructure and operating requirements can be very costly and onerous. The lack of consistency in state regulatory policy adds another layer of challenges to this process, which is already more complex than dealing with conventional recyclables. However, when vegetative food scrap feedstocks are delivered to an animal feeding operation they fall under a far less restrictive set of state regulatory controls. Even though it is the same feedstock representing the same environmental risks, they are subject to far less scrutiny and generally regulated by state department of agriculture officials, and not by solid waste officials. This “unlevel playing field” is a deterrent to the proliferation of



compost manufacturing operations and the resulting benefits derived from introducing compost products back into the soil. **Recommendation:** A consistent, uniform regulatory oversight and permitting policy, at a state level, must be applied to these feedstocks, regardless of the recycling process.

Secondly, compost must be treated like any other mainstream consumer product. Organic residuals are only truly recycled when the resulting compost product is used. There are too many composters, both municipal and private, that have a waste handling versus a product production mentality, resulting in poor quality compost, and a lack of consumer confidence. **Recommendation:** Composters must view themselves and be treated as compost manufacturers. Regular compost-specific testing, accompanied by a statement of ingredients and use directions, should be expected by consumers and required by regulators and specifying agencies. All compost should be tested for quality control and safety.

Thirdly, we support the development of additional education, training and certification programs for SMM professionals. Such programs will assist with professionalizing the industry. For example, the USCC is in the process of developing a Composting Operations Manager Certification. One goal of this program is to provide state regulators with a minimum level of assuredness concerning the skill sets of industry “certified” practitioners. Professional certification could increase the use of best management practices, provide timely training on technology advancements, and increase overall facility success. These outcomes would, in turn, increase the overall success of SMM programs nationally and catalyze the broader adoption in regions where, at present, little-to-no efforts toward SMM programming are being made. **Recommendation:** Require professional certification for all managers of compost manufacturing facilities.

Finally, additional research is needed on the job creation and economic opportunities created by SMM. For example, a report released by the Institute for Local Self-Reliance (ILSR) showed that compost manufacturing facilities in the state of Maryland create and sustain more jobs on a per-ton basis than landfilling or waste-to-energy. Studies such as this illustrate the potential for compost manufacturing – and SMM at large – to positively impact the triple bottom line through creation of local jobs, revenue generation and a healthier environment. Further data collection and research on the economics of SMM could go a long way to convince lawmakers, investors, and citizens of the economic significance of our work, in addition to the more obvious environmental benefits. **Recommendation:** Support federal research dollars on the economic impacts of SMM.

Increasing the recycling of organic materials in the waste stream confers a host of benefits. They are the source of methane from landfills, so increased diversion means reduced greenhouse gas generation. Composting provides biosecurity by reducing plant and human pathogens and pests. Using compost and compost-based products reduces water pollution, increases drought tolerance, and generally promotes healthier soils and plants. Finally, manufacturing compost provides jobs and other economic benefits to the host communities.

The US Composting Council is pleased to support the NRC's Sustainable Materials Management Summit and the subsequent actions that will be pursued as a result.