



STATE OF HAWAII
DEPARTMENT OF HEALTH
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**Testimony in SUPPORT of HB2407 HD1
RELATING TO STATEWIDE COMPOSTING**

SENATOR MIKE GABBARD, CHAIR
SENATE COMMITTEE ON AGRICULTURE AND ENVIRONMENT

Hearing Date: 3/13/2020

Room Number: 224

1 **Fiscal Implications:** This measure may impact the priorities identified in the Governor's
2 Executive Budget Request for the Department of Health's (Department) appropriations and
3 personnel priorities.

4 **Department Testimony:** The Department agrees that composting is a great option for organics
5 management and landfill diversion and supports this bill. The bill in its current form (1) requires
6 the Department to adopt or amend rules to establish a classification system for composting
7 facilities or operations for the purposes of regulating them for health purposes; and (2) allows
8 composting and co-composting in the agricultural district. The bill does not provide any
9 resources with which the Department is to do the work of administrative rulemaking.

10 The Department agrees that the Solid Waste regulations should be updated. In order to
11 update the administrative rules, the Department requests the creation of a Program Specialist
12 position in the Solid and Hazardous Waste Branch to focus on administrative rulemaking efforts
13 and appropriation to fund the position. This position can also be used to update rules for the other
14 programs within the Branch. Drafting and adopting administrative rules is highly technical work
15 and it typically takes more than one year to complete the revision of a rule chapter. The Solid
16 Waste Section does not have any staff positions allocated for this type of work and would find it
17 difficult to update the regulations with its current resources.

18 **Offered Amendments:** None

19 Thank you for the opportunity to testify on this measure.



TESTIMONY OF THE KAHANA FOUNDATION
IN REGARD TO HB2407 HD1 RELATING TO STATEWIDE COMPOSTING
TO BE HEARD BY COMMITTEE OF AGRICULTURE AND ENVIRONMENT
FRIDAY MARCH 13 2:45PM ROOM 224

Dear Chair Gabbard, Vice Chair Ruderman, Chair Baker, Vice Chair Chang, and Members of the Committee,

My name is Alexandra Kahn, and I am the Co-Founder & Director of Media at the Kahana Foundation. We are a Hawai'i-based environmental awareness organization working to improve our community's understanding and support for sustainable change.

Kahana Foundation supports **HB2407 HD1** and provides comments. This measure requires DOH to adopt rules to establish a classification system for composting facilities or operations for the purposes of regulating them for health purposes. Allows composting and co-composting in the agricultural district, including on lands with class A or B soils.

Food waste in Hawai'i accounts for 20% of the total waste stream.

A 2015 study by the University of Hawai'i found that the people of Hawai'i dispose of over 237,000 tons per year of food waste, or 26% of the available food supply, per year.¹ According to the same study, the state spends on average \$1 billion per year managing that food waste, which works out to around \$700/person/year.² Wasted food also wastes other resources, such as arable land and water used for irrigation, both in and out of the state. Additionally, our landfill potential is limited and each landfill on each island is nearing its limit.³ In a recent study to analyze the composition of Hawai'i's waste, food waste-non-vegetative and food waste-vegetative comprise

¹ Loke, M. K., & Leung, P. (2015). Quantifying food waste in Hawaii's food supply chain. *Waste Management & Research*, 33(12), 1076–1083. <https://doi.org/10.1177/0734242X15607427>

² <https://www.hawaiiibusiness.com/wasted/>

³ <https://www.hawaiipublicradio.org/post/hawai-i-island-grapples-garbage#stream/0>

20% of the overall waste stream⁴ and food waste combined with green waste makes up one third of the total waste produced in Hawai'i. It should be noted that the highest occurrence of food waste occurs at the consumer stage, showing that a combination of waste reduction education and resident food waste composting options are essential to decrease our total waste stream.⁵

It is important for the State to pass legislation that permits and encourages businesses and community members to reduce food waste according to EPA's Food Recovery Hierarchy.

According to the EPA's Food Recovery Hierarchy⁶ the first step is source reduction, a task not yet attempted by state legislation; followed by food donation, which is growing across the state due to programs like Aloha Harvest⁷; feeding animals; composting; and landfill. Organic waste, unlike other forms of waste, can have a purpose and alternative ending on the supply chain, such as feeding people and animals, or creating rich fertilizers to supply local farmers.

In the 1997, the city and county of Honolulu addressed one aspect of the Food Recovery Hierarchy and looked towards ways to recycle food. This led to the first mandatory food waste recycling ordinance in the country being adopted, allowing large scale businesses like hospitals, grocery stores, and hotels, to recycle their food waste, including vegetable and fruit waste, eggs, meat and fish waste, dairy waste, bakery waste, noodles, rice and cooking oil.⁸ Most of our food waste comes from the food service and tourism industry, which is recycled and given to piggeries; however, our islands do not have a large animal agriculture market and the supply of food waste generated on the islands trumps the demand of piggeries.

Although this ordinance had a positive effect and led to a decrease in food waste and an increase in food donation, there are many exemptions for the businesses required to participate, and these businesses are left with a lack of food recycling options. While many small businesses do donate their food waste or leftovers, and many schools are focusing on source reduction,⁹ compost needs

⁴ https://www.opala.org/solid_waste/pdfs/2017%20Waste%20Composition%20Study.pdf

⁵ <https://journals.sagepub.com/doi/abs/10.1177/0734242X15607427>

⁶ https://www.epa.gov/sites/production/files/2019-11/food_recovery_hierarchy_-_eng_high_res_v2.jpg

⁷ <https://alohaharvest.org>

⁸ Teresa Dawson, "Food Waste Recycling on Oahu: A Good Thing Gone Wrong, Again," *Environment Hawaii* posted in March 2002 at <http://www.environment-hawaii.org/?p=3114>

⁹ <https://www.centerforgreenschools.org/measured-success-finding-savings-school-garbage>

to be another feasible option. Residences, community gardens, farmers markets, and schools all struggle to compost under current regulation and this bill would pave the path towards the growth in compost programs across the state.

Composting can be the most significant way to divert mass amounts of food waste from landfill and helps to reduce environmental impact.

Eliminating the cost of disposing of food waste through composting will save the people and businesses of Hawai'i hundreds of millions in trash disposal fees and also build a network of nutrient-rich soil producers that can be then used to grow sustainable, edible foods across the state. The EPA also lists several benefits of composting as follows: ¹⁰

- Organic waste in landfills generates methane, a potent greenhouse gas. By composting wasted food and other organics, methane emissions are significantly reduced.
- Reduces the need for chemical fertilizers.
- Promotes higher yields of agricultural crops.
- Helps aid reforestation, wetlands restoration, and habitat revitalization efforts by improving contaminated, compacted, and marginal soils.
- Can be used to remediate soils contaminated by hazardous waste in a cost effective manner.
- Provides cost savings over conventional soil, water and air pollution remediation technologies, where applicable.
- Enhances water retention in soils.
- Provides carbon sequestration.

Additionally, compostable containers with leftover food scraps can be composted, unlike plastic and polystyrene containers with any leftover food scraps are considered contaminated, and if they tossed into the recycling bin, they will end up in the landfill. Contaminated recycling accounts for one of the greatest struggles facing the recycling industry, and approximately 25%

¹⁰ <https://www.epa.gov/sustainable-management-food/reducing-impact-wasted-food-feeding-soil-and-composting>

of recyclable items are contaminated.¹¹ Lastly, Hawai'i does not currently operate a recycling facility and to build one and find use for the recycled materials would cost millions of dollars whereas, we have the capability to have a series of small and medium sized compost facilities spread across the islands at the fraction of the cost to be able to compost on island.

Composting Could Be Accessible for Every Person on Every Island

Tiered scales of composting regulations alleviate pains for the Department of Health and allow for small scale operations to multiply and flourish. The average compost project in the average city is small, often a community garden or a local farm. However, gardens and small farms in Hawai'i are not able to accept food waste from outside sources without a permit and the permitting process is currently the same for a garden as a municipal facility. This bill simply removes some of the barriers placed on small scale operations and will allow for more small scale food waste composting projects to occur.

Kahana Foundation fully supports the request by the Department of Health to hire someone capable of creating these new regulations and tiers and finds this dedicated position, whether it be full time or contracted, necessary in order to speed the process and allow for more composting.

HB2407 HD1 can divert food waste, generate local fertilizer, and decrease Hawai'i's environmental footprint. We **support HB2407 HD1** and we urge this committee to **pass** this measure. Thank you for the opportunity to testify.

Sincerely,



Alex Kahn
Kahana Foundation

¹¹ <https://www.nytimes.com/2018/05/29/climate/recycling-landfills-plastic-papers.html>

HB-2407-HD-1

Submitted on: 3/9/2020 3:56:28 PM

Testimony for AEN on 3/13/2020 2:45:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Dyson Chee	Testifying for Hawaii Youth Climate Coalition	Support	No

Comments:

HB-2407-HD-1

Submitted on: 3/9/2020 6:55:18 PM

Testimony for AEN on 3/13/2020 2:45:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Benton Kealii Pang, Ph.D.	Individual	Comments	No

Comments:

I offer the following comments to HB2407 HD1. I would request this measure receive a review from the Hawaii Department of Agriculture to examine the potential of this measure to further spread the invasive coconut rhinoceros beetle.

Mahalo for the opportunity to comment.

Benton Kealii Pang, Ph.D.

HB-2407-HD-1

Submitted on: 3/10/2020 9:14:57 AM

Testimony for AEN on 3/13/2020 2:45:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Amy Brinker	Individual	Support	No

Comments:



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Executive Officers

Joe Carter, Coca-Cola Bottling of Hawaii, *Chair*
Charlie Gustafson, Tamura Super Market, *Vice Chair*
Eddie Asato, The Pint Size Corp., *Secretary/Treas.*
Lauren Zirbel, HFIA, *Executive Director*
John Schlif, Rainbow Sales and Marketing, *Advisor*
Stan Brown, Acosta Sales & Marketing, *Advisor*
Paul Kosasa, ABC Stores, *Advisor*
Derek Kurisu, KTA Superstores, *Advisor*
Beau Oshiro, C&S Wholesale Grocers, *Advisor*
Toby Taniguchi, KTA Superstores, *Advisor*

TO:

Committee on Agriculture and Environment
Senator Mike Gabbard, Chair
Senator Russell E. Ruderman, Vice Chair

FROM: HAWAII FOOD INDUSTRY ASSOCIATION
Lauren Zirbel, Executive Director

DATE: March 13, 2020
TIME: 2:45pm
PLACE: Conference Room 224

RE: HB2407 HD1 Relating to Statewide Composting

Position: Support

The Hawaii Food Industry Association is comprised of two hundred member companies representing retailers, suppliers, producers, and distributors of food and beverage related products in the State of Hawaii.

HFIA supports statewide waste management solutions. Responsibly managing compostable material here in Hawaii can have environmental and agricultural benefits. In counties that do not use waste to energy technology composting can also help divert waste from landfills. Updating the Department of Health's rules on composting can create a regulatory framework for composting that is better suited to the current needs of our state.

There are many different types of composting and there are new developments being made in compostable materials all the time. This measure is an important step in create a more diverse waste management system for Hawaii. We encourage you to pass this measure and we thank you for the opportunity to testify.

HB-2407-HD-1

Submitted on: 3/12/2020 10:08:57 AM

Testimony for AEN on 3/13/2020 2:45:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Jennifer Milholen	Testifying for Kokua Hawaii Foundation	Support	Yes

Comments:

Aloha, Chair Gabbard, Vice Chair Ruderman and committee members. My name is Jennifer Milholen, and I work as the waste reduction coordinator for Kā• kua Hawai'i Foundation, a local environmental non-profit promoting school gardens, local agriculture, waste reduction, and resource conservation. We are in strong support of HB2407 requiring the regulatory reform of the co-composting permitting process. Diverting methane-generating food scraps away from our landfills and inefficient incinerators, through various composting methods, is the number one land-based strategy for carbon sequestration and mitigating climate change.

Encouraging composting of green waste (landscape trimmings) and food scraps along with compostable products, coffee grounds, brewery grain, and more, can divert 100s of thousands of tons away from strained landfills and incinerators. Currently there is only a single permit process for anyone wishing to accept food scraps for composting, no matter the size and risk potential of the operation. A single farmer wishing to have two small compost piles made from local restaurants' food scraps has to fill out the same permit, and meet the same burdens, as an industrial-scale composting facility receiving an entire island's-worth of materials (hundreds of thousands of tons).

The current permit requirements are sized appropriately for an industrial facility, but create an onerous barrier for any smaller operations. For example, anyone wishing to be approved for accepting any amount of food scraps for composting has to do so on an impervious surface (cement pad, for example), which would cost more than \$10,000 dollars, design and engineer a leachate management system, as well as pay staff to complete a permit application requiring numerous hours to complete (another several thousand dollars).

This application procedure, which was pursued to create two standard composting piles to divert food scraps from a conference, took our staff several months to navigate and ended up being 200 pages long, though the blank application is only 12 pages. No small operations wishing to divert organics from landfills, while creating an urgently needed soil amendment for Hawai'i, are likely to undertake this process. The unintended consequence of an unreasonable permitting process is the operation of facilities with zero oversight, because those that might have complied with registration and monitoring are deterred.

Our concern is that DOH, while fulfilling the important function of protecting public and environmental health, perceives food waste composting at any volumes as inherently dangerous. This is our biggest hurdle to overcome. The creation of compost is a science and an art, but not one that is particularly complicated. Anyone following basic steps of processing and maintenance for a composting recipe can create an operation free of odor, pests, noise and dust as well as a product free of pathogens and safe for use. This is the same formula that has been practiced for thousands of years.

The specific tiers set forth in this bill do not have to be set in stone, though comprehensive and reasonable models exist in Ohio, San Francisco, and Puerto Rico. What is essential, though, for Hawai'i to be able to move forward with this crucial resource management strategy is the reform of regulation that will equate level of risk (low to high volumes of food scraps) with level of application and capital burden, and expands food waste composting to ALL AG-zoned land, including AG-I. The tiered system provides DOH with the ability to track and monitor through registration all of the various small to mid-scale operations, who are also providing proof of effective management and pathogen testing, while scaling the permitting process down so it is accessible and reasonable for anyone but the largest operations. Other municipalities also require a day-long training on appropriate operations and maintenance, which could be implemented here if proper training is a primary concern for DOH. These updates would allow for appropriate permitting and regulations that enable small-scale, community-based composting projects. This lets us diversify solutions to Hawai'i's over-abundance of food waste and will offer compost access in rural areas that will not be served by future large-scale composting facilities.

Mahalo for your support and passage of this bill. Please let us know if you have any questions about this issue.

Jennifer Milholen

Nicole Chatterson
Executive Director
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HB 2407: Support
Hearing: March 13, 2020 2:45 PM
Senate Committee on Agriculture, Energy, and Environment

March 12, 2020

Dear Chair Gabbard and AEN Committee Members,

Zero Waste O'ahu **supports HB 2407 with comments.**

The current draft of the bill requires Department of Health to “establish a classification system for composting facilities or operations for the purposes of regulating them for health purposes.” However, it does not require that the Department specifically re-evaluate the perceived risk of food waste as a feedstock for small and mid-size composters.

Currently, DOH does regulate composting operations for health purposes. The issue is that food waste is over-regulated in ways that are over-conservative, especially in comparison to other states and territories throughout the U.S. with a more refined, tiered composting structure (e.g. Ohio, California, Puerto Rico, New York). The current permitting system places all food waste composters (regardless of size) in a health risk-category that requires them to become permitted as “solid waste management facility”—a process which is inaccessible to small operations. The intention of this bill is to provide a reasonable, accessible pathway for small food waste composters without requiring them to become a permitted “solid waste management facility”.

While this draft of the bill asks DOH to revisit the statutory language, it does not require DOH to specifically examine if food waste of any amount should qualify a composter of any size to become a solid waste management facility. We request that the following underlined language (or similar language that achieves the same end) be added into the bill.

*“The department of health shall adopt or amend rules, pursuant to chapter 91, Hawaii Revised Statutes, to establish a classification system for composting facilities or operations for the purposes of regulating them for health, including but not limited to preventing pollution, preventing the spread of disease and the creation of nuisances, protecting public health and safety, conserving natural resources, and preserving and enhancing the beauty and quality of the environment. The classification system and adopted or amended rules shall encourage food waste composting where possible and not require onerous regulations where unnecessary. **The classification system shall consider the climate and soil benefits of food waste composting. The classification***

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system will weigh the climate risk of not composting with the perceived health risks of compost facilities of various size classes and types. These health risks will be evaluated based on the volume of food waste inputs, the composting technology used, and the size of the compost structure or pile. Only operations over a determined size and volume of food waste inputs shall be considered a municipal solid waste management facility.

From 2013-2016 the *Zero Food Waste Hui*, a group of over 50 local organizations, convened to support the growth of food waste composting projects in Hawai'i. Through this convening it became clear that folks were held back from pursuing projects by the same issue: Dept. of Health permitting requirements. A local farm processing small amounts of food waste from their neighbors would be treated as the same as a municipal scale composting facility. Small operators do not have the scale, impact, or risk level of an industrial solid waste management and it is to the detriment of our community to hold them to the same standards as one. By inhibiting local compost operations, we are sending more food waste to landfills and the incinerator on O'ahu—resulting in increased greenhouse gas emissions.

I will share a short narrative of the implications of requiring a small operation to apply for a solid waste management permit. A member of our team was recruited by the State of Hawai'i Host Committee for the United Nations World Conservation Congress (the largest gathering of its kind, which held in Honolulu in 2016) to a divert food waste from the event to a well-managed local farm. The farm was required to apply to become a solid waste management facility to carry out this short-term project. The application took over 8 months, 200 pages, and the project still did not receive authorization in time for us to divert the food waste because of a lack of staff to review the permit. It also required the farm to move their compost pile onto a concrete pad—an unnecessary and expensive improvement for an operation of their size to temporarily accept food waste. Hawai'i advocated to host this conference and stated we would create a low-impact, sustainable event. Instead of delivering on this, our own permitting structure got in the way.

The data is clear that 1) food waste is an issue (the average household wastes 40% of purchased food and waste audits show food waste is about 30% for most institutions), 2) food waste creates more greenhouse gases when landfilled or burned than when composted, and 3) local compost can avoid imports of fertilizers and help us build up our local soil health and agriculture.

Nicole Chatterson
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Alongside the myriad of other reasons that HB 2407 is a good idea, this bill aligns with the following UN Sustainable Development Goals, which have been adopted as a guiding framework by the state of Hawai'i through the Aloha + Challenge.

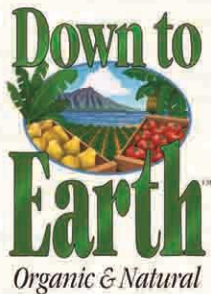
- SDG 9=Industry, Infrastructure and Innovation
- SDG 11=Sustainable Cities and Communities
- SDG 12 = Responsible Production & Consumption
- SDG 13 = Climate Action
- SDG 15 = Life on Land

Mahalo for your time and consideration.

A handwritten signature in black ink, appearing to read "NCh", is written over a horizontal line.

Nicole Chatterson
Executive Director, Zero Waste O'ahu

Love Life!



HB 2407, HD 1 RELATING TO STATEWIDE COMPOSTING
Senate Committee on Economic Development & Business
March 13, 2020, 2:45pm State Capitol

Aloha Sen. Mike Gabbard, Chair, and Russell E. Ruderman, Vice Chair, and Committee Members,

Down to Earth Organic and Natural testifies in support of HB 2407 HD 1.

Down to Earth Organic and Natural has six locations on Oahu and Maui. Since opening in 1977, we have supported healthy lifestyles and preservation of the environment by selling local, fresh, organic and natural products, and by promoting a healthy, plant-based vegetarian lifestyle.

We are in support of HB 2407, HD1 as a means to regulate and encourage more composting sites in the state, and to divert compostable materials from our waste stream. It is estimated that as much as 50% of our rubbish is food waste, contaminated paper, green waste and other compostable materials. There are many benefits of composting such as creating nutrient-rich soil, reducing methane production, improving soil's ability to store carbon, and creating green job opportunities.

Our Down to Earth Organic & Natural stores would be happy to contribute our inedible produce waste to a composting effort.

Thank you for the opportunity to comment on this bill.

Alison Riggs
Public Policy & Government Relations Manager
Down to Earth

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LATE

March 13, 2020

HEARING BEFORE THE
SENATE COMMITTEE ON AGRICULTURE AND ENVIRONMENT

TESTIMONY ON HB 2407 HD1
RELATING TO STATEWIDE COMPOSTING
Room 224
2:45 PM

Aloha Chair Gabbard, Vice Chair Ruderman, and Members of the Committee:

I am Brian Miyamoto, Executive Director of the Hawaii Farm Bureau (HFB). Organized since 1948, the HFB is comprised of 1,800 farm family members statewide, and serves as Hawaii's voice of agriculture to protect, advocate and advance the social, economic and educational interests of our diverse agricultural community.

The Hawaii Farm Bureau respectfully offers the following comments on HB 2407 HD1 which requires DOH to establish a classification system for composting facilities to encourage composting without requiring onerous regulations where unnecessary, *and* which will allow composting and co-composting facilities on all agricultural land, including those lands classified as class A and B (highest) productivity rating.

HFB recognizes the desire to divert food and other wastes away from our landfills. The benefits of this and of composting are well-known. We also appreciate the proponents' well-meaning enthusiasm to make compost available to Hawaii farmers.

However, there are potential hazards and threats to agriculture and our rural communities that must also be recognized. Composting operations must be sited appropriately, designed correctly, and maintained properly. **Accordingly, HFB feels strongly that *no commercial composting facility or operation should be exempt from DOH regulatory oversight, restrictions, inspection, and control.***

The following are some of our concerns:

- **The proposed use of lands with soil classified by the land study bureau's land classification productivity rating A or B, for *commercial waste processing facilities***
- The location of composting facilities and their proximity and impact to nearby farms:
 - Attractive to vectors (flies, rats, termites, etc.)

- Collection and breeding grounds for destructive invasive species
 - Creation of dangerous gases, and potential for fires caused by the heat created by microbial activity
- The types and sources of waste that will be allowed to be collected at these composting facilities – human sewage waste? dead animals? green waste from areas known to be infested with Little Fire Ants, or other threats to Hawaii's agriculture?
- Whether the compost will be properly treated prior to its sale and distribution to farmers and others
 - To avoid the spread throughout the islands of dangerous pathogens and vectors that cause disease
 - To prevent the spread of invasive species such as Little Fire Ants and Coconut Rhinoceros Beetles that thrive in compost

Thank you for taking our concerns into consideration and for your continued support of Hawaii agriculture.

LATE

HB-2407-HD-1

Submitted on: 3/13/2020 11:55:34 AM

Testimony for AEN on 3/13/2020 2:45:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Stuart Coleman	Testifying for WAI: Wastewater Alternatives & Innovations	Support	Yes

Comments:

Aloha, Chair Gabbard, Vice Chair Ruderman & Committee Members,

I'm writing in strong support of this bill to set up a classification system for composting. mahalo for your consideration and support.

Aloha, Stuart



Sustainable Coastlines Hawaii
2909 Waiialae Avenue #19
Honolulu, HI 96826 USA
808-445-2085

HB 2407: Support
Hearing: March 13, 2020 2:45 PM
Committee on AEN

LATE

Dear Chair Gabbard and Members of the Senate AEN Committee,

Sustainable Coastlines Hawaii strongly supports HB2407 and its efforts to expand the opportunity for composting across the state. As coastal defenders we realize the necessity in understanding connections from our soil to our oceans. Composting provides an opportunity for not only regenerating our soils and increasing carbon sequestration, but to increase the capacity of our island to grow food. This resilience model is imperative to things critical to our mission – specifically the reduced use of fossil-fuel based plastic products that continue to plague our island waters and the global oceans.

SCH has coordinated waste diversion programs with businesses and events around the island for almost a decade. The restrictive nature of regulation on composting that currently exists is a barrier to meaningful change. While we understand that the Department of Health is charged with the safety of our island, there is also a necessity to be nimble when sustainability opportunity arises. As plastics continue to be replaced by compostable alternatives, we should be looking for diversified mechanisms to effectively break these new materials down and produce a value-added product (nutrient rich compost) that can help regenerate our soils. The return of food waste back into our soils is also a far more restorative and circular principle than landfilling or incinerating this valuable resource.

HB 2407 will give the opportunity for a mixed-level approach to composting that doesn't restrict farmers, nonprofits, schools, or other community organizations from doing positive work. Smaller scale compost operations will open the possibilities for microgrid composting networks that require less transport and can serve localized systems. This model requires a non-uniform approach to permitting so that the burden is not the same for a small community pilot project as it would be for a large-scale industrial operation serving an entire island. Ultimately, our islands will be far more resilient by approaching systems management in this way.

Finally, we would like to add that by making composting more approachable across the board, the state will be providing a mechanism to help reach carbon neutrality goals. Healthy soils are recognized as the greatest carbon sink on earth and Hawaii has an enormous opportunity to protect its future by investing in its soil health.

With Aloha,



Sustainable Coastlines Hawaii
2909 Waiālae Avenue #19
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808-445-2085

A handwritten signature in black ink, appearing to read "Rafael Bergstrom", with a stylized flourish at the end.

Rafael Bergstrom
Executive Director
Sustainable Coastlines Hawaii
rafael@sustainablecoastlineshawaii.org
808-445-2085

HB-2407-HD-1

Submitted on: 3/11/2020 6:53:28 PM

Testimony for AEN on 3/13/2020 2:45:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Jennifer Navarra	Individual	Support	No

Comments:

I am one of the coordinators of a zero waste group on the Big island. We focus on community building, education and advocacy to reduce our island's waste footprint. A waste composition study for our island presented in Hawai'i County's Integrated Solid Waste Management Plan (update) revealed that ~55% of our waste is composed of organic waste and paper that could be diverted and composted on an island were we have little soil. This bill would encourage and facilitate more organic waste to be diverted from the landfill. Every county in the state is dealing with staggering rates of waste and getting organics out of the landfill is the logical first step in addressing our waste problem. This bill would make diverting organic waste from the waste stream easier by updating an outdated permitting process and making the amount of required permitting appropriate to the scale of the composting operation. This bill will also allow for additional updates of the permitting process as Hawai'i moves towards a more sustainable future to increase food production and become less reliant upon imported food. We must also do our part to help mitigate our impact on climate change. I encourage you to please support this bill so we can build a more sustainable future in the Hawai'i islands.

HB-2407-HD-1

Submitted on: 3/12/2020 11:11:03 AM

Testimony for AEN on 3/13/2020 2:45:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Elizabeth Benyshek	Individual	Support	No

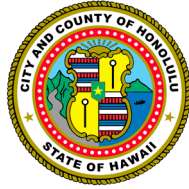
Comments:

I am in strong support of HB2407, which would require the Dept. of Health to establish a compost facility or operations classification system for regulation regarding public health. This bill allows for the expansion of composting across the state that is necessary with the recent increase in compostable items at businesses and in individual homes. Thank you for your time and consideration.

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EXECUTIVE DIRECTOR &
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FRIDAY, MARCH 13, 2020, 2:45 PM

STATE OF HAWAII
SENATE COMMITTEE ON AGRICULTURE AND ENVIRONMENT

**TESTIMONY ON HOUSE BILL 2407, HD1
A BILL RELATING TO STATEWIDE COMPOSTING**

BY,

JOSHUA STANBRO
EXECUTIVE DIRECTOR AND CHIEF RESILIENCE OFFICER
OFFICE OF CLIMATE CHANGE, SUSTAINABILITY AND RESILIENCY

Dear Chair Gabbard and Members of the Committee:

The City and County of Honolulu (City) Office of Climate Change, Sustainability and Resiliency (Resilience Office) **supports with comments** House Bill 2407, HD1, which requires the State of Hawai'i Department of Health (DOH) to adopt rules to establish a classification system for composting facilities and allows composting in agricultural districts.

In 2017, food waste accounted for one fifth of O'ahu's overall disposed waste. We have endorsed the statewide *Aloha+ Challenge* waste reduction goal of 70% by 2030, and finding solutions for food waste is an important part of achieving our shared goal. In addition, with the passage of Bill 40 (2019) by the Honolulu City Council, the City is committed to reducing single-use plastics in an effort to reach our solid waste management goals. More and more businesses and event organizers are looking to compost their waste, and the development of composting infrastructure can enable higher levels of waste diversion.

Amending DOH administrative rules to create tiered regulations for composting facilities enables greater opportunities for composting at all scales on island while appropriately managing the associated public health risks. By supporting expanded composting, we can increase waste diversion, reduce greenhouse gas emissions, and avoid increasing the burden that solid waste management puts on O'ahu's taxpayers.

Tiered composting regulations, similar to what was described in the purpose of the original version of this bill, are an efficient way to safely enable more food waste

composting operations without increasing the regulatory and enforcement burden on DOH staff. The Resilience Office suggests the purpose of this bill be modified to expand upon what was provided in the original bill as shown below:

Accordingly, the purpose of this Act is to enable expansion of safe food waste composting statewide by:

- (1) Requiring the Department of Health to establish a risk-based, multi-tiered registration and permitting system for composting facilities that supports increased composting; and
- (2) Incorporating a requirement for composting operator training to safely enable reduced regulation of food waste composters; and
- (3) Allowing the lowest tier of food waste composting to be permitted by rule where the total amount of food waste composted does not exceed 1/2 cubic yard per day and no compost is used off-site; and
- (4) Allowing composting and co-composting in agricultural districts.
- (5) Requiring the Department of Health to update its co-composting rules based on the stated purpose herein by July 1, 2021.

Thank you for supporting the growth of composting infrastructure in Hawai'i and for the opportunity to testify in support of HB2407, HD1.

HB-2407-HD-1

Submitted on: 3/13/2020 2:13:38 AM

Testimony for AEN on 3/13/2020 2:45:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Severine Busquet	Individual	Support	No

Comments:

Aloha

Project Drawdown (a study by over 200 experts from 22 countries over 5 years) reports that reducing food waste is the 3rd most efficient solution of the top 100 solutions to reversing climate change. The priority is to make less waste in the first place. And, with the waste we do create we should turn it back into healthy soils. Healthy soils sequester carbon and offset the need to use and import fertilizers.

Currently there are few places permitted to handle residential food waste across Hawai'i. This means we bury or burn most of our food waste leading to additional pollution. Entities processing food waste in Hawai'i need to apply to become a "Solid Waste Management Facility" through the Department of Health (DOH). This process can take up to 8 months at cost tens of thousands of dollars. This is appropriate for large, composting facilities but is not feasible (or reasonable) for small community-scale operations.

DOH needs to create appropriate permitting and regulations that enable small-scale, community-based composting projects. This lets us diversify solutions to Hawai'i's over-abundance of food waste and will offer compost access in rural areas that will not be served by future large-scale composting facilities.

For these reasons, I strongly support SB2407 SD1.

Thanks for your attention

Severine Busquet

Hawaii Kai, Honolulu