



May 15, 2018

Metro
600 NE Grand Avenue
Portland, OR 97232

To Whom It May Concern:

The Oregon Restaurant & Lodging Association has had the opportunity to review the updates to the proposed Metro code language and draft administrative rules relating to food scraps. At this time, we would like to share our comments as a part of the public record as we prepare for the public hearing currently scheduled for July of 2018.

ORLA is proud to be a partner in the current campaign (Food Waste Stops With Me) to bring higher levels of awareness to the importance of food waste recycling efforts. We applaud Metro and other participating governments for their work to lead the campaign, encourage change, and broaden the base of participants interested in being active recyclers of food waste.

As our opportunity to participate in public testimony this summer approaches, we would like to continue to express our support for the merits of a food waste collection program and the benefits it brings to Oregon communities.

Any mandate on all food related businesses will bring with it tremendous responsibility and unforeseen challenges that require problem solving and expediency. Our concerns with a food scrap mandate can be summarized into three categories: Implementation Dates, Logistics, and Health & Safety.

Implementation Dates

Our hope relating to implementation dates is that we can avoid instituting a new mandate on private businesses before giving the new project the opportunity to find its footing through a pilot project. For example, currently the proposed mandate would take effect on Business Group 1 as of March 31, 2020. Group 1 is defined as those food related businesses who generate 1,000 pounds of food waste or more per week. Without a pilot geographic area to test out any new mandate, Metro runs the risk of putting out logistical fires and health and safety issues across the entirety of Metro's expansive geographic boundaries. We highly recommend that a specific geographic territory limited in scope be subject to any new food scrap mandate with high levels of customer service being provided to the subject area by Metro staff to troubleshoot and solve problems quickly. We recommend a pilot project be implemented in two phases with the first phase being all government partners receiving taxpayer funds (Colleges & Universities, Correctional Facilities, Hospitals, and Elementary and Secondary Schools) involved in food scrap collection and the second phase being the remaining food related businesses within the given region.

If the goal is over time to provide a highly efficient, logistically proven food waste collection program that is safe for consumers and embraced by business partners then we would encourage the full utilization of this approach.

Through a geographically specific pilot program, Metro could streamline the important work of coordinating with both applicable haulers and local government partners and assess best practices, identify unintended consequences, and solve problems for the broader goals of the program.

Logistics

If approved as currently proposed, the Business Group 1 Food Scrap Mandate would include a patchwork of effected food related organizations across Metro's geographic boundaries. As a matter of efficiency and effectiveness, we have trouble seeing how a scattering of Group 1 participants across Metro's boundaries will be successful from a collection standpoint. Details with each applicable hauler would have to be worked out for only those entities who generate 1,000 pounds of food waste or more per week. Given current industry practices for garbage and recycling, we fail to see how a system will work to effectively and efficiently collect food waste (separate from garbage and recycling) and make sure the collection process is standardized across all applicable haulers and overseen in partnership with all applicable local governments.

If Metro were to focus on a specific territory, service delivery and program efficiency could be focused on through best practices and simpler stakeholder communication.

Public Health & Safety

Given the logistic concerns that could result from food waste collection services amongst Group 1 participants, industry members have been quick to scrutinize the problems that can be encountered with other regulatory bodies if food waste is not picked up on time and as scheduled in a safe and accessible location for applicable haulers. Any problems with pickup or collection procedures could directly impact businesses who rely on successful operations to pay their employees and provide a positive dining experience for their customers. It would not be surprising to see legitimate concerns raised by county health departments and the Oregon Health Authority relating to uncollected food waste, pest control, collection point accessibility issues, odors, homeless, litter, and other unforeseen challenges that could develop during or after normal hours of operation.

Conclusion

Given the importance Metro is placing on the food waste program, we feel the process for implementation to be the determining factor in a successful launch. And given the current constructs for how implementation is currently proposed, we feel a different approach will be necessary. We would like to recommend Metro work with the Oregon Restaurant & Lodging Association and other stakeholders to identify a geographic pilot sub region within Metro's boundary to launch a new food waste initiative. In addition, we highly recommend that Metro look more closely at food related organizations mentioned above as those who are best positioned to participate in a first phase of any pilot program (i.e. taxpayer funded organizations). Approaching the program in this way will showcase Metro's commitment to business partners who will be eager to see Metro's willingness to test out any new mandate before putting their private business operation at risk.

We greatly appreciate your consideration of our observations and your willingness to include them as part of the public record and ongoing discussions relating to food waste collections. Thank you for your time and attention and please reach out to us at any time for further communication on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Brandt". The signature is fluid and cursive, with a large initial "J" and "B".

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