



US Composting Council

Guiding Principles

Compostables in Extended Producer Responsibility (EPR)

The Biodegradable Products Institute (BPI) is North America's leading certifier of compostable materials, products, and packaging, with 300+ member companies worldwide. BPI supports a shift to the circular economy by promoting the production, use, and appropriate end of life management for materials and products that are designed to fully biodegrade in specific biologically active environments.

The US Composting Council advances compost manufacturing, compost utilization, and organics recycling to benefit our members, society. With 800+ organizational and individual members, our focus is on compost use and successfully operated compost facilities that provide a product that benefits soil, water and global carbon sequestration.

The majority of composting facilities today accept yard trimmings only, despite food being the top material landfilled each year. As communities and businesses look to reduce greenhouse gases and establish programs to collect food scraps for composting, infrastructure will need to change and expand.

BPI and USCC are supportive of a variety of funding mechanisms to help cover the costs of collecting and processing compostable products associated with food scraps, including but not limited to extended producer responsibility programs (EPR). These EPR fees should not, however, be considered the only means of funding a national network for food scraps composting, which would need to be addressed through grants/loans and voluntary funding mechanisms.

EPR principles for compostables should meet the following criteria:

- 1** A proportional share/amount of revenue, based on existing compostable products and non-recyclable items that could be reasonably redesigned to be compostable, must be allocated to organics recycling programs for the successful collection and processing of compostables, as well as education focused on maximizing diversion and minimizing contamination.
- 2** The EPR fees must cover all materials. All compostables are defined as a class (not by material), certified defined by a common performance criteria including but not limited to ASTM D6400 and ASTM D6868.
- 3** Certified compostables are items or packaging that are designed to be associated with food scraps (e.g., food-soiled items) or yard waste and be collected in a source separated organics stream (e.g. food scraps), not co-collected with recyclables or other mixed waste destined for landfill.

- 4 There must be representation from the certified compostable products and compost manufacturing industries, at state advisory councils/boards, as well as at a broader producer responsibility organization (PRO) or in a separate PRO for compostables.
- 5 Compostables must be exempt from post-consumer recycled content (PCR) requirements, as these materials are recycled into compost.
- 6 Since compostables are not collected/processed on their own like recyclables, compatibility with existing sister policy/goals on food waste collection and composting should be considered, or new organics recycling policy development is strongly recommended, since compostables are not collected/processed on their own like recyclables.
- 7 If eco-modulation* is included, fees for certified compostable products should be relevant to composting, not recycling or landfill/incineration, since they are collected, processed, and recovered separately. Fraudulent claims of compostability and other greenwashing around "biodegradable" consumer products should be considered potential disruptors to composting.

*Eco-Modulation: A varied fee based on the ease/likelihood of recyclability/compostability.

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