DISTRICT OF COLUMBIA

COMMERCIAL FOOD WASTE DIVERSION GUIDE

Rules and Guidance on Source Separating Food Waste for Diversion

SECOND EDITION

ZERO WASTE DC

GOVERNMENT OF THE DISTRICT OF COLUMBIA
MURIEL BOWSER, MAYOR

INTRODUCTION

In 2020, the District of Columbia passed legislation requiring the District's largest commercial food waste generators to begin implementing diversion strategies to keep their food waste out of the trash (D.C. Code § 8-1031.03a). The Department of Public Works (DPW), through its Office of Waste Diversion (OWD), has prepared this guide to help commercial entities understand these legislative requirements, recognize the importance and commercial benefits of food waste diversion, and start implementing food waste reduction and diversion strategies in back-of-house activity.

Why is food waste diversion important?

Food waste contributes to higher food purchasing costs, increased rodent activity, and climate change.

- *Cost:* The average person wastes 256 pounds of edible food per year, equating to $728 per year (2024), or $2,913 annually for the average household of four.[1] Reducing wasted food can reduce food purchasing costs, both at home and in food service businesses.
- *Rodent Mitigation:* Food that is disposed of in unsecured trash carts and let to sit in alleyways for days, helps to sustain rodent populations by providing them food and shelter. Food waste that is collected in secure containers for separate food waste collection can decrease the rodent activity near businesses by removing their food source.
- *Environmental Impacts:* Food waste comprises 24% of municipal solid waste sent to landfill. When food waste breaks down in a landfill, it releases large amounts of methane, a potent greenhouse gas that contributes to climate change, air pollution, and biodiversity loss, according to the U.S. Environmental Protection Agency (EPA) *2019 Wasted Food Report*.[2]

An estimated 5,600 commercial entities generate food waste in the District, including hundreds of large generators, such as college and university cafeterias, athletic stadiums, hotels, hospitals, food halls, and catering companies and thousands of smaller generators—including restaurants, cafes, coffee shops, and food trucks.[3]

These entities contribute more than 85,000 tons of food waste to the District's waste stream annually, 42,000 tons of which are produced by large generators.[4] Rather than disposing of food waste, the District now requires select entities to separate food waste from recyclables and other waste materials.

Implementing commercial food waste diversion programs is an important next step in helping to divert 80% of the District's waste from disposal and plays a significant role in Mayor Bowser's *Zero Waste DC Plan*.[5] The good news is that by examining how to comply with these new rules, businesses generating food waste can re-evaluate their purchasing, meal planning, and food preparation practices to significantly reduce wasted food. Reducing food waste generation and diverting it from disposal can result in significant cost savings, better trained staff, and improved staff morale, and demonstrate the vital role District businesses play in achieving Zero Waste.

[1] Source: https://www.epa.gov/system/files/documents/2025-04/costoffoodwastereport_508.pdf
[2] Visit tinyurl.com/EPAWastedFood2019 to view the full report.
[3] Source: "Co-Digestion Feasibility Study for the District of Columbia (2018)" https://zerowaste.dc.gov/page/reports-1
[4] Source: "Co-Digestion Feasibility Study for the District of Columbia (2018)"
[5] The District's Zero Waste Plan is available at zerowaste.dc.gov.

Which entities are required to divert food waste?

Selected food waste generators will be required to establish food waste diversion programs, in accordance with the Zero Waste Omnibus Amendment Act of 2020 (D.C. Code § 8-1031.03a).[6] The Act specifically requires the diversion of back-of-house commercial food waste, which means:

> *Commercial food waste separated at the point of discard by employees of a commercial establishment. It does not include food waste discarded directly by customers, but it does include food waste discarded on behalf of customers by employees.*

The Act outlines the types of commercial food waste generators that will need to comply in 2023 and 2024; other commercial food waste generators may be designated to comply with these rules in subsequent years.

As of January 1, 2023	• **Colleges and universities** with at least 2,000 residential students. • **Retail food stores** (i.e., grocery stores) with an area of at least 10,000 square feet.

As of January 1, 2024	• **Colleges and universities** with at least 500 residential students.
	• **Retail food stores** that are part of a chain that:
	  ○ Operates stores under common ownership or control for which waste is collected by the same private collector;
	  ○ Consists of three or more stores; and
	  ○ Has a combined area of at least 10,000 square feet.
	• **Arenas or stadiums** with seating capacity of at least 15,000 persons.
	• **Hospitals and nursing homes** with at least 300 beds.

After January 1, 2024	• The Mayor may require other entities to divert food waste based on available organic waste processing capacity in the region.

How do we comply with these requirements?

DONATE

Donate excess edible food.

SEPARATE

Separate back-of-house food waste from recyclables & trash

PROCESS

Process food waste through on-site systems or by arranging collection

EDUCATE

Train employees on food waste requirements.

Commercial food waste generators in the categories above must establish programs that conform to the following requirements:

- **Donate** excess edible food consistent with Title 48, Chapter 3 of the DC Code, "Donated Foods".[7]
- **Separate** all back-of-house commercial food waste generated on premises from recyclables and trash.

[6] To read the complete text of the Zero Waste Omnibus Amendment Act of 2020, visit: code.dccouncil.gov/us/dc/council/laws/23-211
[7] For more information about liability protections and tax incentives for food donation, review Title 48, Chapter 3 of the DC Code, "Donated Foods".

- **Process** food waste:
  - Arrange for the separate collection and transport of back-of-house commercial food waste to an organic waste processing facility or to processors for use as animal feed; or
  - Process back-of-house commercial food waste using an on-site organic waste processing system, provided that:
    - In-vessel composting is encouraged for on-site processing, but other proposed systems may be approved by DPW's Office of Waste Diversion;
    - All processing equipment is adequate to process food waste generated at the premises in a safe and sanitary manner; and
    - All food waste processing equipment is installed in accordance with plumbing codes, if applicable.
  - Entities must ensure food waste is stored in containers with secure lids, such that it is not commingled with recyclable or trash and does not create a public nuisance.
- **Educate** employees:
  - Entities must ensure employees are informed about the program requirements by providing regular training about proper methods to separate and store food waste, including food to be donated, and posting instructions on the proper separation of food waste in multiple languages as appropriate.
- **Post Signage:** Entities must also post signage that includes the trade or business name, address, and telephone number, and states either (a) the day and time of food waste pickup by private collector; (b) that the entity transports its own food waste; or (c) that the entity provides on-site processing.

Entities complying with these requirements must also ensure their source separation and on-site processing methods comply with all relevant District of Columbia health and fire codes.

GETTING STARTED

STEP 1 Learn More About Food Waste Diversion

Consider the EPA's Wasted Food Scale (pictured here)[8] when planning and implementing a food waste diversion program. Conduct online research to find tools that can assist in establishing a program.

STEP 2 Conduct a Waste Audit

To determine how much food waste is being generated and identify opportunities to reduce food waste and increase food donation, start by conducting an audit of your waste.

Separate food waste from other trash and recyclables using either one day's worth of food waste or an otherwise representative sample of food waste from your organization. Separate food scraps into discernable categories such as meats, grains, vegetables, fruits, and subcategories as needed. Assess the quantities of each category. Use your findings to determine what types of food waste are most prevalent in your operations.[9] A waste audit will require up-front planning and staff engagement, so everyone understands its purpose and outcomes.

[8] Source: US Environmental Protection Agency (2023): www.epa.gov/sustainable-management-food/wasted-food-scale
[9] Visit epa.gov/smm/instructions-conducting-waste-assessments for more information about conducting a waste audit.

STEP 3 Identify Ways to Reduce Food Waste

Following a waste audit, review collected data to determine ways to reduce back-of-the-house food waste and plate waste. Consider using bones and vegetable scraps for stock, sauces, or pickling. Use greens from root vegetables, such as carrots and beets, to make salad, soup, pesto, or sauté. Freeze surplus or nearly spoiled fresh fruits and vegetables. Eliminate garnishes and reduce portion sizes if post-consumer waste is significant. Online food waste reduction and donation management applications are also excellent tools for helping to eliminate unnecessary food waste while documenting and tracking your progress.[10]

STEP 4 Offer Discounts for Prepared Food at the End of the Day

Offering discounts on prepared, unsold foods at the end of the day not only brings in added income, but also reduces costs incurred by disposing of otherwise good food. Businesses can register for online and mobile applications that have emerged, helping to make this type of program a seamless part of their operations.

STEP 5 Partner with a Local Food Rescue Organization

Donating leftover prepared foods to food rescue organizations is a requirement of the Zero Waste Omnibus Amendment Act. Any edible food should be donated to an organization that feeds people in need. Visit the Department of Energy and Environment's website at reuse.dc.gov/page/food-recovery for more information about organizations in the District that accept food donations and guidelines for safe commercial food donation.

STEP 6 Consider Food Waste Hauling Services

If your business decides to haul the material to a local processing facility, start by contacting the collection company you already use to collect trash and recycling to determine if they can also haul your source-separated food waste to a local composting or anerobic digestion facility.

If your business' current collection company is unable to provide food waste hauling, please check out DPW's *Approved Solid Waste Collectors* list to identify companies that can provide these services.[11] Keep in mind that food waste, like all other solid waste, must be collected accordance with Section 705.2(a) of the District's Municipal Regulations and must be collected at least twice per week.

SEPARATING FOOD WASTE FOR COLLECTION

Once selected, work closely with the collection company to determine the types of food waste and other compostable products like food-soiled paper they can accept for processing and how food waste and other acceptable materials should be separated for collection.

STEP 7 Consider On-site Processing Options

If your business is generating only a small amount of material, consider on-site composting opportunities to avoid collection costs and potentially use the compost on premises. On-site composting and biodigestion setups may have an upfront price tag but will pay off over a short period. It will require a champion to manage and maintain the system but with some technical guidance, they can be straightforward to manage. Choosing an onsite system will reduce the amount of food waste in your trash that needs to be hauled away, but may

[10] Visit epa.gov/sustainable-management-food/tools-preventing-and-diverting-wasted-food for more information.
[11] DPW's list of Approved Solid Waste Collectors can be found at dpw.dc.gov/swcinfo.

require additional inputs, such as a carbon-rich material source (such as wood shavings), that may not be available onsite. On-site options include the following:

- **In-Vessel Composting** can process large amounts of waste without taking up much space and can accommodate most types of organic waste (e.g., food scraps, meat, animal manure). This method involves feeding organic materials into a drum, silo, concrete-lined trench, or similar equipment allowing good control of the environmental conditions such as temperature, moisture, and airflow. The material is mechanically turned or mixed to ensure it is aerated. In-vessel composting options vary in technology employed, output quality, size, and capacity.
- **Vermicomposting (worm)** bins, also known as worm farms, are easy to construct and are also available for purchase. One pound of mature red composting earthworms (approximately 800-1,000 worms) can eat up to half a pound of organic material per day. Worm bins can be sized to match the production volume of food scraps and may be well suited to small-scale on-site processing of food waste, with the added benefit of production of worm castings, an excellent fertilizer for indoor plants.
- **On-site digestion** allows food waste, including dairy, fats, oils, and grease to be converted into biogas (i.e., methane) that can be used onsite to generate electricity and heat as well as vehicle fuel and charging with additional processing. The liquid fertilizer produced can be used as a soil amendment. Several on-site digestion systems are currently on the market, but more are anticipated to be available in coming years.

IN-VESSEL BIODIGESTER

STEP 8 Offer Continuous Staff Training & Reinforce Source Separation Techniques

Provide signage for staff to understand your process and offer periodic training and refresher courses on how to source separate food waste and consider participating in OWD's *Food Waste Ready* online training and certification program.

For info about commercial food waste diversion and DPW's Food Waste Ready training, visit zerowaste.dc.gov/commercialfoodwaste.

For better long-term success, ensure signage and information regarding the types of materials to be source separated is up-to-date and visible to all staff responsible for separating food waste. Sample signage to help your business separate recyclables and food scraps may be downloaded at zerowaste.dc.gov/page/resources-businesses.

FREQUENTLY ASKED QUESTIONS

Q: What are the benefits of reducing food waste?

A: Reducing and diverting food waste from disposal helps reduce greenhouse gases that would be released into the atmosphere when it's disposed of as trash. Food scraps that are composted, instead of thrown away in the trash, can be used to make more soil and produce more, higher quality food. Reducing wasted food may also save your business money by reducing the amount of food you need to buy. Finally, securely separating food scraps away from trash can reduce rodent activity near your business.

Q: Why are only certain food waste generating entities designated in the *Zero Waste Omnibus Amendment Act of 2020*?

A: Mayor Bowser designated some of the largest generators to begin source separating food waste for diversion from disposal in 2023 and 2024 but reserves the right to designate additional entities as early as 2024. Other entities may be required to comply in the future.

Q: What are the best practices for storing food waste prior to collection?

A: Whenever feasible, food waste should be stored in a cool area in bins with tightly secured lids. Food service pails with clear labels with snap-on or screw-top lids are good for internal use.

Q: What are the best outdoor storage options?

A: Typically, collection companies will provide their customers with outdoor collection containers, unless they require use of food service pails, or other, smaller collection containers, to be placed outside on the day of collection. Traditional collection companies will usually provide 35- to 65-gallon wheeled plastic collection carts. You may also consider lockable plastic or metal enclosures in which carts or dumpsters can be stored, offering another level of protection to keep carts from being damaged.

Q: Will this program attract more rodents?

A: Rodents are attracted to the smell of food if they have easy access to it. Currently, food generating entities are placing food waste into their trash containers, which may or may not be properly maintained, or have tight-fitting lids. Separating food waste from other trash will reduce the risk of rodents getting into trash containers. Other recommendations include setting food waste outside only on collection days or using a lockable heavy-duty plastic or metal enclosure to store carts or dumpsters containing food waste.

ZERO WASTE DC

For more information, visit
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자세한 내용은 다음을 방문하십시오.
Để biết thêm thông tin, hãy truy cập

zerowaste.dc.gov/commercialfoodwaste