



November 29, 2021

Katherine Mockler
Assistant City Attorney
City of Gainesville, Florida
MocklerKL@cityofgainesville.org

RE: Draft Waste Ordinances

Dear Ms. Mockler:

On behalf of the Florida Retail Federation, please accept these comments to the 3 most recent draft Waste Ordinances that you provided to me. The Florida Retail Federation is a non-profit trade association whose members include grocery and convenience stores located throughout the City of Gainesville and who will be subject to the proposed Ordinances. Please see our comments and questions below:

Comments on Draft Food Diversion Ordinance

- We have general concerns about the hierarchy of donations:
 - “Feeding hungry people” – there are a lot of rules/restrictions as to what foods can be donated and what types of foods are accepted;
 - “Feeding animals” – unclear what types of foods and where donations will be available for donation.
 - Composting – this is very costly – will there be a composting site provided by the City?
 - Will there be a “Food Waste Processing Facility” in the City?

Comments on Draft Food Waster Ordinance

- The definitions of “Food” and “Food Waste” are unclear;
- The requirement to have an equal number of “Food Waste” collection receptacles is problematic due to potential sanitation concerns and confusion by the general public as to what is “Food” and what is “Food Waste.”

Comments on Draft Solid Waste Disposal Ordinance

- We continue to have concerns regarding the mandatory take back program for prescription drugs.
- The number of required recycling receptacles is problematic.



**Florida
Retail Federation**

THE VOICE OF FLORIDA RETAILING

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Thank you for the opportunity to submit questions and comments regarding these draft Ordinances. We would welcome an opportunity to discuss further at the next scheduled meeting of the Zero Waste Subcommittee.

Sincerely,

Lorena Holley
General Counsel and Vice President