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Public Consultation on the Draft National Food Waste Prevention Roadmap
Waste Policy and Enforcement Division
Department of the Environment, Climate and Communications
Newtown Road
Wexford
Y35 AP90

23 March 2022

Submission on draft National Food Waste Prevention Roadmap

Dear Sirs,

InSinkErator is the leading global brand for Food Waste Disposer (FWD) units which play an important and constructive role in the sustainable and effective treatment of food waste by households. We are pleased to make an input in that respect to this consultation process. In the first instance, InSinkErator recognises that the most important step to preventing food waste among house holders is to minimise food waste arising, through consumer education on the purchasing and use of food. Significant changes in consumer behaviour are central to reducing food waste.

There are also additional measures that can be taken in the supply and retail aspects of food distribution to manage the size of food packaging relevant to consumer consumption levels so that consumers do not buy more than they need.

Where food waste does arise it is vital that it is not sent to landfill and that the residual nutrients contained in the waste are captured for other uses, including fertilisers and energy generation from anaerobic digestion.

FWD use plays an important role in facilitating the collection of food waste as part of the overall nutrient mix available for anaerobic digestion and as such facilitates the recycling and recovery of this waste stream. FWD use is consistent with national policy on the recovery of nutrients and secondary raw materials.

The table in Figure 1 on page 3 of the consultation document includes the disposal of food waste through the sewerage system as being equivalent to sending food waste to landfill. This is not the case as the inclusion of food waste nutrients within a wastewater treatment plant (WWTP), directly facilitates the recovery of nutrients and has been shown to increase the production of biogas and fertiliser, both of which have significant value. The addition of finely ground food waste to wastewater can improve the treatability of the wastewater and can boost the energy production by as much as 70%, depending on local wastewater composition.



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In addition FWD use is particularly suitable in high rise multi-unit developments where challenges concerning the collection and storage of food and organic waste can often lead to this waste being sent to landfill. The use of FWD units to harvest the benefits of food waste for the wastewater treatment system also avoids the environmentally challenging impacts of kerbside collection, where HGVs are involved in generating significant levels of emissions when collecting organic waste.

In the context of EU policy goals, in the Netherlands, Belgium and Sweden food waste disposers are currently generating much interest as an additional tool to achieve circular economy targets, particularly in apartments and multi-occupancy buildings.

FWD use should form part of the solution in the sustainable management of food waste, alongside composting and kerbside collections. It aids in preventing food waste going to landfill and can support the active recovery of key nutrients as part of the WWT process.

We hope that these points will be considered as the draft policy is finalised and would be happy to provide any further information required by the Department on our products and FWDs generally.

Yours sincerely

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[Redacted contact information]