



**Tesco Ireland Submission to the Public Consultation on
the Draft National Food Waste Prevention Roadmap
March 2022**

Introduction

Tesco Ireland welcomes the opportunity to respond to this consultation on the *Draft National Food Waste Prevention Roadmap* and to share our perspective on same.

We welcome that the Department is engaging with the business sector in this manner, and we are available to discuss any aspect of this submission and to expand on or clarify any points as required.

As this document may contain commercially sensitive information, we would request should it be published, that we are provided with advance notification and the opportunity to identify/redact any such information.

About Tesco Ireland and our approach to food waste

Tesco Ireland is one of Ireland's largest private sector employers, with over 13,000 colleagues based in our head office, distribution centre and 152 stores in towns and cities nationwide. We are conscious of our role in protecting the environment, and helping to support the delivery of related policies, and we are working hard to make and influence change where we can.

Being a sustainable business is very important to us. We are members of Repak and have received the Business in the Community *Business Working Responsibly Mark* in recognition of our sustainability commitments. We are also proud signatories of the Business in the Community *Low Carbon Pledge* to halve our carbon footprint by 2030 and of Repak's Plastic Pledge. Our policies are aligned to the United Nations Sustainable Development Goals, as well as European and national frameworks.

At Tesco, we know that perfectly matching supply and demand is impossible – there will always be some unsold surplus food in our business. However, we have no time for waste and we believe it's simply not right that perfectly good food should go to waste at any point in the supply chain. We're proud of our leadership position within the retail sector in tackling food waste and have made a commitment to help reduce food waste on farms, in our stores and at home, with the aim of halving food waste by 2030, in line with SDG 12.3. We were pleased to be an active member of the Government's Action Group on Food Waste in the Retail Sector until it concluded in 2019, signing the Food Waste Charter to target, measure, and act on food waste within our business. Through segregation of waste in our stores, we have sent zero waste to landfill since 2009.

We were the first Irish retailer to publish independently-assured food waste data detailing the amount of food wasted in our operations, and we were also the first retailer in Ireland to partner nationally with FoodCloud, an Irish social enterprise that links businesses who have too much food with those who need it most. We're also now partnering with food-sharing app OLIO - a third-party volunteer organisation that connects neighbours with each other and with local businesses so surplus food can be shared - for a trial in nine of our Dublin stores. We are the first business in Ireland to work with OLIO, and envisage that the retail industry will follow suit on this partnership.

In 2020, we introduced a new way to manage food waste from stores, backhauling it to a single point before sending it to anaerobic digestion with Irish company Green Generation. This process change means fewer trucks on the road collecting bins from stores, and an annual reduction of 250 tonnes of CO2. As part of this partnership, we have also become the first Irish retailer to purchase renewable gas made from our own surplus food to power stores.

We're also working in partnership with seventeen of our largest Irish fresh food suppliers on an initiative - Champions 12.3 - to support them to share the amount of food waste in their operations and use this insight to take action farm to fork. Led by us, these suppliers have committed to publicly target, measure and act to tackle the issue of food waste at their manufacturing sites and to work collaboratively to adopt the UN's SDG12.3. In addition, we are currently working with FoodCloud and Munster Technological University to complete a study of food surplus at a grower level to understand if there is an opportunity to capture more at the farm gate and redistribute to those in need.

We know that our colleagues and customers are seeking action, and we are working to deliver change where we can. We are conscious of our responsibility in this space, and know that tackling food waste can help to address the wider climate challenge; we have a net zero target of 2035 for our own operations and a commitment to cut emissions - including those generated by the products we sell and across our supply chains - to zero by 2050, in line with the UN's aspiration of keeping global warming below 1.5C.

We welcome the opportunity to respond to this consultation paper and look forward to sharing our views on, and supporting the delivery of, national policy in this area in the future, as appropriate.

Please note, for the purposes of this submission, we have focussed on the areas which most impact our business, and where we believe we can have the most influence.

Responses to questions outlined

Do you think the approach as outlined in the draft Roadmap will deliver the reductions necessary to reduce Ireland's food waste by 50% by 2030?

We welcome the farm to fork approach to the draft Roadmap as we recognise that retail has been a primary focus for the reduction of food waste to date, despite the majority of food waste generated in Ireland happening outside of retail. A focus on the measurement of food waste in primary production and on reducing same at source is important as is supporting the supply

chain in how they can measure and report food waste accurately. Supporting primary producers to then minimise food waste, or ensure surplus is processed as donations, through animal feed or anaerobic digestion, would also be important. We would be pleased to share our insights and expertise with others in the food supply chain, as appropriate, as has already proven successful with our Champions 12.3 initiative.

What additional actions do you think would be effective in helping Ireland reduce its food waste?

We acknowledge the ambitions of the Roadmap with regards to measurement, reporting and acting on food waste, as well as the focus on charitable donations, and building awareness.

We would welcome the opportunity to discuss additional outlets for food surplus management where possible, in line with the food waste hierarchy, namely animal feed which is currently an option in the United Kingdom and many other European countries. We are of course cognisant of the importance of ensuring that animal by-product does not find its way into the animal food chain, but would welcome discussions to see if there is an opportunity for suitable bakery or fruit/veg items to be redirected in this manner, as in other markets. In our UK business, controlled trials are currently underway with regards to using black soldier flies to process waste into feed for animals outside of the human consumption chain (pet foods).

In relation to surplus food donations, there are stringent measures in place around the types of foods that can and cannot be donated to those in need. In regulated and controlled food environments, like retail, where the focus on quality, food handling and food safety is of utmost importance, we propose that there should be scope to donate currently non-donatable foods each evening if they are to be consumed immediately, like pre-packaged sandwiches and fresh foods to go. This would support retailers to reduce their surplus, and help those most immediately in need (e.g. groups/charitable causes supporting those who are homeless).

What are the most effective awareness raising measures that could be taken to reduce food waste?

We believe that the commitment in the Roadmap to deliver a sustained communications and awareness programme, principally through Ireland's Stop Food Waste Programme, is appropriate, as is the plan for future household food waste prevention communication activities to be linked to the targeted priority food waste types and populations.

We also agree that the education and awareness activities – such as training for those in the food supply chain, and engaging Local Authorities to amplify messaging – are important.

Consumer awareness is one of the key drivers which will help to reduce the amount of food waste produced both in homes and business. We would be pleased to support any campaigns of this nature, and indeed have supported the EPA's Stop Food Waste campaigns to date, to help further amplify these messages.

Given the current context of food price inflation globally, educating consumers on how to best use all of the food they have at home, and linking this to saving money and to supporting our climate change ambitions could have a tangible impact.

We note also the proposals around exploring how food can be packaged, labelled, priced, and promoted with an aim of reducing household food waste, including the proposed focus on date marking and raising awareness of 'best before' and 'use by'. We would be pleased to share our views on these issues, as our technical teams have in-depth knowledge of practical implementation within the retail environment.

Which sectors or stakeholders do you think should play a key role in the implementation of the Roadmap?

We note that the Roadmap has included Primary Production, Manufacturing and Processing, Retail and Distribution, Restaurants and Food Services, and Households as the stages of the supply chain and we would agree that sectors and stakeholders within these areas are crucial to the implementation and success of the Roadmap.

As a large-scale retailer, we believe that retail has a key role to play, both in terms of measuring and managing its own waste, but also in encouraging and supporting suppliers to do the same – particularly given that the Roadmap has identified primary production as a key area for improvement.

As already mentioned, at Tesco Ireland, we're working in partnership with seventeen of our largest Irish fresh food suppliers on the Champions 12.3 initiative to support them to share the amount of food waste in their operations and use this insight to take action farm to fork. Led by us, these suppliers have committed to publicly target, measure and act to tackle the issue of food waste at their manufacturing sites and to working collaboratively to adopt the UN's SDG12.3.

This Champions 12.3 initiative has been hugely successful to date, and we would be happy to share insights. In this regard, it may be useful to re-engage the Retail Action Group as a means by which retail can lead on food waste reduction.

Are you satisfied with the proposed Roadmap monitoring and evaluation arrangements?

With regard to monitoring and evaluation arrangements, we note that the Roadmap will be monitored and reviewed periodically to assess its impact, and this is to be welcomed.

We also note that, subject to EU developments, it is expected that the baseline year that links to the 2030 50% reduction target will be the reference year 2020 and that Ireland's food waste dataset for 2020 will be reported by the EPA in mid 2022.

We welcome the establishment of a Food Waste Prevention Task Force, and would be keen to join same, and share our perspective as a leading retailer in this space

In addition, we note that Ireland's Forum on Food Waste will continue to be held periodically and we would also be pleased to be a part of this network to exchange views on food waste prevention and reduction activities.

Have you any other comments or feedback on the content of the draft Roadmap?

Prevention measures

We note that the following are outlined as potential food waste prevention measures, among others:

- Working with key business sectors to ensure they play their part in not only reducing the waste that arises at the point of sale, but also collateral waste that occurs lower down and higher up the food chain on farms, in food production and in our homes;
- Working with the Retail Sector Action Group on preventing food waste in the supply chain;
- Supporting the design and roll out of packaging developed by retailers and the packaging industry that meets the needs of food preservation without encouraging the generation of packaging waste, especially plastic packaging; and
- Working with retailers to end the sale of multi-buy packs to prevent over-buying by consumers.

We are pleased to see the Retail Sector Action Group called out here and would be happy to be involved in same.

With regard to packaging, we would suggest in any future policy developments that existing legal and regulatory requirements already pertaining the retail sector are taken into account – for example, the Single Use Plastics Directive has led to many changes for retailers, while retailers also have strict insurance requirements and health and safety standards with which to abide, and it is important that these are taken into consideration in the context of any proposed changes. We would ask that the retail sector is fully consulted with in relation to any proposed changes in this regard, to provide our perspective on practical implementation at a store level, as well our engagement and experience with food and drink suppliers.

Food donation and distribution

As already mentioned, Tesco was the first Irish retailer to partner with FoodCloud and has led the way in this space, with the equivalent of over 15 million meals donated to date.

We note the commitments in the Waste Action Plan for a Circular Economy to:

- Support food donation and investigate ways to simplify food donation for business;
- Investigate the potential impact of a prohibition on the destruction of edible food in advance of its 'use by' date;
- Investigate the regulatory and legal barriers to 'Good Samaritan' acts of donation and whether mandatory donation of edible food from retail outlets would reduce food waste; and

- Using the EPA’s Food Waste Charter, support a voluntary target with retailers and the processing industry for a percentage of edible food to be donated.

With regard to prohibition of destruction of food prior to its use-by date, this is not a practice we engage in, however the concept of ‘prohibition’ may prove problematic in certain circumstances. In relation to mandatory donations, this could also prove problematic, as sufficient numbers of charitable organisations are not in place nationally to manage this currently. As the first national retail partner to FoodCloud, we have worked collaboratively with them since 2014 to implement surplus food donations from our stores, and as yet, do not have 100% coverage due to a lack of suitable charitable organisations nationwide who are willing or in a position to take and use surplus.

We are broadly in favour of food waste reduction targets, however we believe it is important that the approach to implementation of food waste policy is carefully considered in order to be effective in the Irish market - we believe any food waste targets should be incentivised to encourage greater adherence to and adoption of the food waste hierarchy with priority given to donation to humans in the first instance. It is important to note on this point, that the charitable food sector in Ireland is not as established as in the United Kingdom or some other European countries and as a result, there is a limited existing capacity to take food donations.

Research

We believe an evidence-based approach to tackling food waste is crucial, and so we welcome that the Food Waste Prevention Task Force will identify and maintain a register of priority research topics on food waste. We note that date marking, food loss at the primary production stage and greenhouse gases associated with food waste are some of the areas identified as a potential for research. Again, it will be important - particularly when it comes to date marking - that the technical elements are thought through from the beginning, to avoid any food safety risk. We would be pleased to share our views on these issues as they pertain to the retail environment.

We are currently working with FoodCloud and Munster Technological University to complete a study of food surplus at a grower level to understand if there is an opportunity to capture more at the farm gate and redistribute to those in need, and we would be happy to share findings in due course.

Conclusion

At Tesco Ireland, we are committed to reducing food waste in line with SDG 12.3, and we welcome the publication of the *Draft National Food Waste Prevention Roadmap* as a means to progressing this goal across all sectors.

We welcome the opportunity to respond to this consultation and are available to discuss any aspect of this submission and to expand on, or clarify, any points as required.