

## Response by ACE Ireland to the Department of Environment, Climate and Communications (DECC) consultation on the National Food Waste Prevention Roadmap

Friday 25 March 2022

The [Alliance for Beverage Cartons and the Environment Ireland \(ACE Ireland\)](#) represents Tetra Pak, Elopak and SIG Combibloc, the leading manufacturers of beverage cartons for the Irish and European markets.

ACE delivers sector-wide environmental initiatives on behalf of its members. Its objective is to provide a platform in Ireland to benchmark and profile beverage cartons as a circular, recyclable, and sustainable packaging solution with low carbon benefits.

As set out in the '[ACE Beverage Carton Roadmap to 2030 and Beyond](#)', the beverage carton industry will strive for its packaging to continue to actively contribute towards the ambitions of the EU Green Deal, specifically climate neutrality, circularity, biodiversity and resilient food systems, and food waste reduction while never compromising the health and safety of consumers.

### **1. 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?**

ACE Ireland supports the overall approach taken in the draft National Food Waste Prevention Roadmap and recognises this as an important step in reducing Ireland's food waste by 50% by 2030. Key to the success of this will be setting and communicating realistic interim targets and milestones for each part of the supply chain up to 2030, as well as overall targets for the supply chain as a whole.

The Roadmap specifies that the EPA is currently working to establish measurement and reporting methodologies for each sector. As part of this process, the EPA should directly engage with all stakeholders to ensure that the measurement and reporting methodologies established are fit for purpose, and that they account for the unique circumstances of each sector. Food packaging has a critical role in reducing food waste, for example, and must be recognised as part of the solution. This also applies to single-portion packs, which deliver only as much food or drink as is required in one consumption event, thereby avoiding excess consumption and possible product wastage. We would be keen to support the EPA in developing methodologies for measuring the impacts of packaging.

Separately, we welcome the inclusion of research and innovation in the Roadmap. ACE members remain committed to supplying the Irish food and drink industry with packaging that protects food and drink and delivers functionality whilst being recyclable, low-carbon and made mainly from bio-based materials.

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

While food packaging is referenced in the Roadmap, this is mainly based on wider commitments set out in the Waste Action Plan for a Circular Economy. Greater emphasis should be placed within the Roadmap on the role that packaging plays in reducing food waste and therefore in reducing carbon impacts – particularly packaging that is in itself low-impact, low plastic and circular, such as packaging is made mainly from renewable materials.

The beverage carton industry's 'Roadmap to 2030 and Beyond' sets out the industry vision to deliver the most sustainable packaging for resilient food supply systems which is renewable, climate positive and circular. The industry fully supports the ambition to provide food packaging solutions which meet the needs of food safety and preservation whilst minimising carbon impacts and packaging waste. We fully agree with the emphasis placed on collaboration and research between the food and packaging industries. We believe this will have positive impacts along the supply chain, particularly for the 'retail and distribution' and 'household' sectors.

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

A mass communications campaign across mainstream and digital channels will be required to secure consumer awareness and buy-in around the ambitions to half food waste in Ireland by 2030. From a consumer perspective there needs to be:

- clear communication on the simple steps they can take to reduce food waste and to highlight resulting positive impacts;
- clear communication on date marking and the differentiation between 'best before' and 'use by';
- links between other communications programmes and food waste reduction, such as those on waste and recycling;
- support from all public facing stakeholders across the food supply chain to amplify messaging on food waste reduction from DECC and the EPA;
- greater exposure of the Stop Food Waste programme to households;
- ramped up messaging within schools and educational settings to motivate and mobilise future generations to champion food waste reduction;
- clear annual updates on progress made and where there is room for future improvement.

In terms of the food supply chain, there needs to be an emphasis on training and skills to help industry develop and implement its own programmes that contribute to reducing food waste.

This will require the obligations of each part of the food supply chain in working towards a 50% overall reduction to be identified and communicated, in addition to the measurement and reporting framework set out by the EPA.

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

ACE Ireland agrees that the EPA, as the environmental regulator, is best placed to manage the overall implementation and monitoring of the Roadmap. Communications relating to the implementation of the Roadmap should be driven by both the EPA and DECC, supported by public and private stakeholders within the food supply chain and waste management industry.

### **5. Are you satisfied with the proposed Roadmap monitoring and evaluation arrangements?**

The monitoring and evaluation arrangements set out in the Roadmap make sense. However, it is not clear how effective they will be until we have full sight of the monitoring and evaluation framework being developed by the EPA, including the reporting methodologies. Again, we strongly encourage the EPA to engage with all sectors of the food supply chain as part of this process, to ensure that best outcomes are delivered.

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

ACE welcomes the commitment to establish a Food Waste Prevention Task Force to identify and maintain a register of priority research topics on food waste, informing the different research funding calls that may cover aspects of food waste. We encourage DECC to ensure that this task force and its sub-groups have representation from all sectors across the food supply chain, including packaging.

**ENDS**