Draft National Food Waste Prevention Roadmap Public Consultation Questions CEWEP Ireland Response

CEWEP is the umbrella association of the owners / operators of Waste to Energy (WtE) Plants, representing approximately 450 WtE from 18 European countries. Our members make up 86% of the WtE capacity in Europe. CEWEP Ireland is the Irish branch of CEWEP Europe and has two members: Indaver, which operates the Meath Facility and is proposing to develop a similar Facility in Cork; and Covanta, which operates the Dublin Facility.

General Comments

CEWEP Ireland ('CEWEP') fully supports the policy objectives outlined in the draft National Food Waste Prevention Roadmap. The importance of proper source segregation and avoidance of contamination in relation to all waste streams including food waste cannot be underestimated and is fully supported by CEWEP.

It is clear that significant action is required if the State is to be in a position to deliver the commitment to reduce food waste by 50% by 2030 in line with the UN Sustainable Development Goals (SDG's).

Given the substantial carbon impacts associated with food waste and the fact that Ireland generated approximately 1.1 million tonnes of food waste in 2019, all households and businesses have a role to play in driving the successful delivery of Ireland's National Food Waste Prevention Roadmap.

Ultimately, the prevention and better management of food waste will bring savings for both consumers, businesses and society as a whole whilst helping to achieve sustainability and supporting Ireland's transition to a circular economy.

Question 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?

Response:

Yes, on the whole the approach outlined should assist with reducing the volumes of food waste generated in Ireland. In particular, the setting of quantifiable medium and long-term targets is welcomed as without such milestones, the same cannot be predicted with any degree of certainty eight years in advance.

With regard to the 2030 reduction target, the same would need to be contingent on ongoing broad measures to promote public awareness in relation to the proper management of food waste, proper source segregation and avoidance of contamination at household and business level in the first instance.

Question 2

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

Response:

As referred to in the Consultation document, continued and ongoing public awareness campaigns will be needed and the use of digital technology applications for use on smart phones may provide an effective means to engage the public in a more consistent manner in relation to food waste prevention and proper source segregation.

A commitment to deliver sustained communications and awareness on food waste prevention for the public is committed to in the Roadmap and is very much welcomed. I

In this regard, the continued development of the MyWaste.ie portal as a national resource to provide more information on all matters waste related, including food waste would be beneficial.

Question 3

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

Response:

As referred to in response to question 2 above, the prevention of food waste in the first instance and the proper management of food waste thereafter, including the importance of source segregation require awareness raising and behavioural change initiatives directed towards individuals, households and small businesses on a consistent basis.

A dedicated campaign focusing on reducing contamination is undoubtedly needed as it would appear that many citizens have a limited understanding of the importance of why it is necessary to separate food waste correctly. Full participation must be encouraged in order that the proper segregation of food waste becomes a social norm.

In this regard, it may be useful to build upon The Food Waste Recycling Project and the findings of the "National Brown Bin Awareness Pilot Scheme in Sligo City" which highlighted that the provision of a range of educational and collection tools could improve the capture and quality of food waste in the food waste recycling bin.

Question 4

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

Response:

Citizens, businesses, operators and policy makers all have a key role to play in the implementation of the Roadmap. Improvements in food waste measurement and priority actions along the food supply chain to help deliver on Ireland's commitments on food waste and loss prevention should assist stakeholders in this regard.

In addition, the focus on Green Public Procurement (GPP) in the Roadmap is also welcomed. The UN Sustainable Development Goals (SDG's) recognise the transformative potential of green public procurement. For example, SDG12 commits to 'ensure sustainable production and consumption processes' and SDG Target 12.7 will 'promote public procurement practices that are sustainable in accordance with national policies and priorities.'

From a national policy perspective, the Waste Action Plan for a Circular Economy¹ sets out a suite of policy proposals aimed at accelerating green procurement practices. The Programme for Government also references a number of important commitments in relation to GPP.

Thus, the implementation of such policy measures in relation to food waste (and indeed all waste streams) would enhance Ireland's standing as a green economy whilst simultaneously delivering environmental policy objectives focused on carbon reduction and food waste reduction.

Question 5

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

Response

Yes, on the whole the monitoring and evaluation arrangements set out in the Roadmap should assist with the delivery of key policy objectives outlined.

As identified in the Roadmap, a robust national system for food waste measurement and reporting is needed in order to meet Ireland's reporting obligations and to monitor Ireland's progress in meetings its UN and EU commitments to 2030 and beyond.

Question 6

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

Response

Currently, separate recycling bins for food waste are not provided in numerous apartment blocks in the capital and around the country and should be introduced where feasible and practicable. From a circular economy perspective, it is not ideal that residents in many apartment blocks currently only have access to a black (residual waste) bin. Management companies must have a responsibility to ensure that bins are presented correctly in such complexes.

In addition in the context of the development of new apartment blocks, a requirement pursuant to planning conditions to provide an appropriate and acceptable level of space for recycling bins including separate organic bins should be introduced as a matter of priority.

¹ Waste Action Plan for a Circular Economy, Ireland's National Waste Plan 2021-2025, Section 18, Green Public Procurement Waste at page 60: Waste Action Plan for a Circular Economy