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:**

Diversion Green "Food Waste Prevention & Education Services" welcomes the approach by taken by the Dept of Environment, Climate and Communications; we feel that Food Waste/Loss has finally found its due place on the political agenda. Diversion Green welcomes the opportunity to respond in this public consultation. The Roadmap has successfully identified all the areas where we food waste occurs. The draft we feel will act as the major driving force and catalyst to tackle Irelands 1.1 Million tonnes of food that is wasted annually. It is positive to see that each part of the food chain from farm to fork has been identified, the figures clearly show where we are wasting most, and we feel these areas should receive investment, funding and innovation grants according to these figures:

Production & Manufacturing – 497,448 Tonnes

Retail - 111, 297 Tonnes

Households - 236,530

Hospitality - 254,745

We feel that if each area where food waste occurs is invested in individually as part of the bigger food system the roadmap will be successful, food waste is complex and has many layers and reasons as to why it happens, bottom line in 2022 where food security is a major priority for Ireland we feel that at this stage "Food Waste Is A Choice" and this choice will be tackled by the Roadmap.

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

### **RESPONSE**

Diversion Green strongly recommends the following FOR:

#### **RETAIL SECTOR**

Re-thinking Irelands Food Safety Policies for use by/sell by/best before dates, Germany for example as less food waste per capita as compared to Ireland, one of the main contributing factors is their longer food dates; Germany has 11 Million Tonnes per annum. The DECC, FSA and the EPA could invest in some R&D for this to happen in Ireland.

## **HOUSEHOLDS**

At Diversion Green we feel the roadmap is missing the opportunity that home composting can harness for food waste prevention, water conservation, self sufficiency and biodiversity to name a few. Home composting and food waste prevention go hand in hand along with food security and sustainable living. Home composting helps the maker to think about growing food and educates households about food waste. We feel the roadmap could encompass "Composting Awareness" for households and help them participate in the circular economy movement. The EPA could roll out an

educational road show for the entire Country. The term in the roadmap to describe compost as a "Low added use" ignores the benefits that composting our unavoidable food waste resources can have on food waste prevention, water protection, biodiversity and personal food growth. At Diversion Green we like to call it the "Full Circle Method" for the household composting helps us to divert to green and connect with nature.

#### **HOUSEHOLDS CON'T**

With regard to proper food waste segregation the national brown bin and its place in the roadmap needs to be examined along with the infrastructure. Only half of the Country has access to a brown and there is very little consideration for brown bin collections in the development and construction of apartment blocks. At Diversion Green we feel that the "Brown Bin Is A Very Poor Solution To A Bad Problem" we feel that the introduction of the Brown Bin in 2012 has possibly increased the tonnage of food waste as we feel households and the hospitality sectors feel that their food waste is justified if they use the brown bin.

### **PLANNING LAWS**

At Diversion Green we feel that the planning laws should consider more green spaces especially for apartment living to provide gardens for composting, allotments and spaces for growing food. The disparity and food poverty that exists in Ireland from the loss of knowledge of food growing needs to re-looked at. Food security is a now a major issue for Ireland due to our Common Agricultural Policy, reliance on imports, Climate Change and our fragile food supply systems. Providing more spaces to grow and learn for all households would help enhance our path towards a circular economy and self sufficiency.

#### **RETAIL SECTOR CON'T**

The retail sector and its ownership status seems to create loopholes in Ireland, the entire food waste policies in the retail sector need to be looked at from cradle to grave. Shops are openly throwing away food on a daily basis with no negative comeback. Yes many are connected to Food Cloud collections services, which is operated by food collection volunteers on the ground, this system alone is flawed as it is volunteer ran and food cannot always be re-distributed sometimes due to the amount. Yes the supermarkets openly state how they work with food cloud and their charity partners to distribute surplus food in essence the surplus should be a minimum not a maximum, this maximum relates the the "Full Shelf Syndrome" all the popular and large supermarkets operate within. Retail food waste needs to be regulated and Green Washing needs to be stopped.

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

## **RESPONSE**

Diversion Green recommends the following for tackling "Food Waste" in Ireland.

- 1) Opening the Conversation about Food Waste in civic society.
- 2) Public Awareness campaigns similar to "Stop Food Waste" especially in the school systems.

- 3) Breaking the gap in the Green Conversation by making understandable information available to all while enabling more people to participate especially from marginalised societies. At Diversion Green after some research we feel that a large % of people do not have a voice and are excluded.
- 4) Provision for more education and awareness about food waste in Ireland and how as a nation we can prevent it.
- 5) Provide more education to the end the confusion about food dates to help with household food waste, after a large amount of research we found that "Confusion" led to households to waste food.
- 6) Educate about the connection between food loss/waste and the impact on our climate due to carbon emissions from food waste and water loss.
- 7) Connecting food producers with the Bord BIA, Olio, Food Cloud, Too Good to go education programmes.
- 8) Showcase "Ireland Food Waste Prevention Roadmap" at large events like Bloom, The Ploughing Championships, Electric Picnic etc
- 9) More grow your own initiatives such as GIY, people are struggling to feed their families while we waste food daily, this would help stop food poverty in Ireland.
- 10) Educate our farmers about more diverse farming methods this may combat over production, supply and waste.
- 11) Facilitating a transition back to loose produce such as fruit and veg in our retail spaces, this seems very important for our Elderly community, single people and people on a budget. Food waste and the elderly can be an issue which would be a wonderful research project.
- 12) Recognise the role convenience food plays in the food waste mountain especially in the larger supermarkets.
- 13) Rethink the amount of food supplied to DEIS Schools, after working in some DEIS schools and seeing large amounts of food wasted, we feel that it adds to the poverty cycle in Ireland.

# 4. What Stakeholders or Sectors do you think should play a key role in the implementation of the Roadmap?

- 1) Social Enterprises
- 2) Food Waste Prevention Innovators
- 3) Food Donation Charities
- 4) NGO's
- 5) Corporate Bodies (especially with onsite canteens)
- 6) Community Groups (Gardens & Allotments)
- 7) Food Retailers
- 8) Food Producers, Farmers and Organic Farmers
- 9) ICA
- 10) Local Councils
- 11) Waste Management Companies
- 12) Education Boards and all Educational Institutes
- 13) The hospitality industry
- 14) The Vintners Association
- 15) Agricultural workers

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

Yes we are happy and see the value in all the stakeholders, sectors, and other groups coming on board, our only concern is with the timing of the roadmap evaluation, we have 8 years to reduce by 50% by 2030, we feel a yearly time period or every two years would be more sufficient to make the reductions required to align Ireland with the SDG's 12 and 12.3.

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

## **RESPONSE:**

Diversion Green is delighted that the DECC and EPA are now so heavily involved in Food Waste Prevention and that it is now placed high on the political agenda, Ireland as a nation will have the tools to end food waste or reduce it by 50% by 2030, a big task but a very managble task. With Roadmaps like this we have the opportunity to better source our food, help our indigenous food producers to thrive while maintaining food security for the ever growing population.

Thank You