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Public Consultation on the Draft National Food Waste Prevention Roadmap
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Public Consultation on the draft National Food Waste Prevention Roadmap (EPAC-0322)

The Environmental Protection Agency has reviewed the draft National Food Waste Prevention Roadmap (hereafter, the Roadmap) and welcomes the opportunity to submit its views. The Roadmap is a welcome development to set out an overarching strategy for the delivery of Ireland's target of halving food waste by 2030. It also provides an important implementation mechanism for many key measures that are needed to achieve this challenging target. The EPA confirms its commitment to work with the Department to support the development of national food waste strategy and the implementation of the Roadmap through its food waste prevention programme.

National Policy

The inclusion of food waste reduction commitments presented in numerous national policy documents, including the *Waste Action Plan for Circular Economy, Ireland's CAP Strategic Plan 2023-2027*, the *Climate Action Plan 2021* and in *Food Vision 2030* will support the Roadmap ambitions, recognising the potential that reducing food waste has for delivering Ireland's objectives on circular economy, climate, and sustainability in the food industry. A dedicated heading for food waste in the forthcoming Circular Economy Bill will place this Roadmap on a

statutory footing and ensure political continuity of government action on food waste. The Roadmap should have an overarching national policy position, establishing a coordinating role to ensure policy coherence and joined up, efficient implementation.

It is important that the linkages between food waste and climate change are clearly articulated in the Roadmap. This link needs to be crystalised through the development of metrics that can be used to quantify food waste prevention achieved in terms of emissions saved.

Roadmap roles and responsibilities

The document as currently written presents a strategic high-level document. The food waste challenge issues are complex, interconnected and need to be tackled in an integrated way. The overall ambition of the Roadmap could be increased by listing priority actions, e.g. for Year 1, and identifying key roles, responsibilities, lead and support organisations to ensure integration and delivery across the food value chain, involving multiple stakeholders and in an increasingly complex policy environment. While the Roadmap articulates that all stakeholders need to work together with a common goal, it should identify that the Department of Environment, Climate and Communications are the overall lead organisation driving the implementation of the Roadmap and bringing together all the stakeholders in working towards that goal.

It is welcome that the Roadmap is seeking to build on the strong foundations and relationships established through the food waste prevention programme led by the EPA. Given the continued central role of the national food waste prevention programme, the EPA should be assigned a clear co-ordinating role to drive actions to strengthen the impact and scale up the reach of the work to date. In addition to the EPA, the document also needs to identify roles for other key actors to support delivery of the target.

As well as seeking to leverage work led by the EPA, the Roadmap should include detail of other actions required from key organisations and stakeholders. If further engagement with these stakeholders is required to agree appropriate roles and responsibilities, the document should be explicit on the intention to prepare an implementation plan within a short timeframe and consider including a commitment to setting out the specific priority actions for 2022 to 2025 and the resources to deliver these actions.

The inclusion of a monitoring and periodic review process will ensure the Roadmap is working to achieve a reduction in food waste and will allow for updates where required.

It would be helpful to include a schematic in the document to show the hierarchical structure and linkage of activities between the Roadmap and including the national food waste prevention programme and the Food Waste Prevention Task Force.

The Food Waste Charter

The EPA recognises the importance of improving food waste measurement and data reporting to support targeted actions that will drive food waste reduction across the food supply chain. The EPA welcomes the voluntary agreement approach to this. Voluntary agreements are being used in other countries to establish industry commitment to measure and reduce food waste, e.g.

Courtauld in UK, United against Food Waste in The Netherlands, General Agreement in Germany. The advantage of a voluntary agreement is that its structure, targets and objectives can be quickly and easily adjusted in response to changing policy contexts.

The EPA will work with the Department to extend the Food Waste Charter to include other key sectors in the food value chain. The Charter will be revised to include specific measurement and reporting obligations, using the EPA national standard methodology, and target-based reduction commitments. To encourage a systems approach across the supply chain and ensure a sense of common purpose, the EPA intends to form a Food Waste Charter Action Group, with sub-sectoral or topic working groups be formed. The EPA will work in partnership with the Department to support the formation of these groups, taking into consideration the proposal in the Roadmap for establishing a national Food Waste Prevention Task Force and sub-sectoral groups. The Agency proposes to introduce the Charter in Q3 of 2022.

Given the short timeframe to achieving Ireland's target, the Roadmap should include a clear statement on what will happen (i.e. mandatory targets and reporting assigned to food industry participants) if the voluntary approach is not having an impact within a specified period, e.g. by 2025. A model similar to a producer responsibility scheme may be worth considering to support the development of an appropriate data collection and reporting framework.

Measurement, data and monitoring

The EPA supports the need for establishing an appropriate baseline data set and baseline year to provide a clear evidence base to measure progress towards delivery of the national target for a 50% reduction in food waste by 2030. It is acknowledged that further consideration will be needed, taking into account EU developments on data reporting, targets and baseline year, however the Department should also consider the potential impact of Covid-19 on food waste when selecting an appropriate baseline year. The EPA will support the establishment of an appropriate baseline through national waste statistics reporting and the food waste prevention programme.

The EPA has developed a national food waste measurement protocol to support a consistent approach to measurement in food sector businesses and this will provide the basis for improving data reporting and targeted food waste reduction across the supply chain. The EPA will continue to support capacity building in food sector businesses to improve data quality for national reporting and develop benchmarks against which businesses can assess performance. The roll out of the measurement protocol will be accompanied by communications to increase understanding by businesses on the importance of consistent measurement to identify opportunities for food waste prevention, valorisation of unavoidable waste and provide accountability in terms of environmental commitments. It is important to note that food sector businesses will require support in implementing this voluntary approach. The tasks to provide this support such as communicating with new charter participants, explaining the measurement protocol, supporting queries and gathering data will require additional resourcing.

Given the current focus by business on climate actions and reduction of emissions, the Roadmap should emphasise the climate gains that come with reducing food waste and include an action to develop climate-relevant metrics for food waste in Ireland. These metrics should take account of the potential GHG and CO₂ emission reductions.

As well as baseline data, the Roadmap should include interim milestones and targets against which the progress can be monitored. This will provide a clear evidence base and help with obtaining stakeholder buy in to adopt timely corrective action.

The Department should consider the introduction of mandatory measurement and reporting of food waste by commercial food and drink companies if the voluntary agreement approach is not having the desired impact. The Roadmap should include an interim milestone against which introduction of mandatory measures would be evaluated.

The EPA recognises the importance of monitoring and evaluating the impact of food waste reduction measures and reporting on Ireland's progress in meeting its targets. The EPA suggests a model similar to a producer responsibility scheme may be worth considering to support the development of an appropriate data collection and reporting framework and to support monitoring and evaluation of progress. The EPA will investigate this approach as part of the roll out of the Food Waste Charter but may need resource input from the Department to carry out this work.

Whatever delivery model/mechanism is agreed as appropriate for these tasks, implementation will be complex so it will be important that the Implementation Plan sets out the priority actions needed to achieve this. Likewise, it will be important for the Plan to specify the stakeholders that will need to input to each of these actions, the lead and roles and responsibilities for implementing each action, and terms of reference for the Food Waste Prevention Task Force. In particular, roles and responsibilities related to monitoring and reporting of progress need to be clarified. The additional resources that are likely to be required to implement the required actions should also be specified.

Communications, awareness and education

The Roadmap recognises the continued central role of the Stop Food Waste Programme in delivering-sustained communications and awareness on food waste prevention. The EPA will continue to deliver targeted evidence-led campaigns through the national Stop Food Waste campaign. The EPA recommends that the Stop Food Waste programme be assigned a co-ordinating role in this regard to ensure effective targeted messaging and use of resources. In this co-ordinating role, the EPA will prepare annual communications plans and co-ordinate targeted communications, liaising with the Department-led Waste Communications Strategy Group, as well as Local Authorities, Regional Waste Management Planning Offices and other organisations to amplify the reach of the food waste prevention communications in Ireland. The importance of sustained and co-ordinated communications and awareness raising to encourage behaviour change is supported through EPA behavioural insights studies. This research highlights the need to make and keep people aware of how much food waste they are producing, and to encourage

people and businesses to adopt good food management behaviours by taking simple actions in their day-to-day life to reduce the food they waste.

The Roadmap identifies the importance of including education on food waste prevention through schools and professional curricula. It is recommended that the Roadmap should also recognise the importance of education in cooking and food management skills in schools, and advocate for increased inclusion in school curricula, such as through increased uptake of home economics or through inclusion in other subjects such as Civic, Social and Political Education.

Leading by Example

It is suggested that the role of Government as a leader is included in the Roadmap. The document recognises that there is a role for Green Public Procurement as a driver for public sector action and the inclusion of specific food waste measurement and prevention actions in Government Department and Agency canteens is recommended. The 2015 European Commission's Circular Economy package shares the aim of requiring an EU-wide food waste reduction of 30% by 2025 and 50% by 2030. This target could be adopted to specific sectors. Examples of this could include:

- the reduction of reduce food waste from canteens in Government Departments by 30% by 2025
- the reduction of food waste in public sector healthcare facilities and third level education facilities by 30% by 2025
- a requirement that Government Departments and Agencies to use only event venues with food waste measurement and recognised environmental management systems in place.

Including food waste reduction targets in Government Department food services contracts is strongly recommended. It is important to ensure that the existing green procurement criteria that have been developed by the EPA for the purchase of food and catering services are applied to Government Department food services contracts. The development of case studies demonstrating the use of these criteria when procuring food service contracts by Government Departments that have utilised these will be important to support those Departments with less experience in this area. It is also recommended that green procurement guidelines/good practice principles for large scale entities outside the public sector are developed. The EPA can support this through its work on developing GPP guidance and upskilling for public procurement specialists through the Circular Economy Programme.

Research

The EPA welcomes the proposal to identify and maintain a register of priority research topics on food waste and a co-ordinated approach to inform different funding calls. This will ensure a coherent and strategic overview of food waste and losses research priorities. With many different research funds, it is essential that funding is applied efficiently to fill identified knowledge gaps, to complement rather than duplicate existing activities and work towards national strategic priorities.

While the Roadmap provides non-exhaustive examples of relevant EU and national research and innovation mechanisms, it should reference Science Foundation Ireland as a significant source of research funding and as well as LIFE, should also mention other EU-funded research such as Horizon Europe.

In the section on future areas of research that will be considered, it is suggested to also include reference to the impact of changing dietary patterns in terms of 'Greenhouse Gases Associated with Food Waste'.

It is also suggested to highlight the important role that advanced technology will also play in waste prevention and production and consumption patterns. As AI¹ evolves further, it is important to include the role of research in knowledge transfer to inform methods/tools/frameworks/templates to facilitate active engagement for behaviour change.

Strategic Environmental Assessment

The Department should fully consider, as appropriate, the requirements of the Strategic Environmental Assessment (SEA) Directive and implementing regulations (S.I. 435 of 2004, as amended) and the Habitats Directive, early in the plan-preparation process.

We also refer you to the EPA Good Practice Guidance for SEA Screening to assist you in considering whether SEA is required for the Roadmap:

<https://www.epa.ie/publications/monitoring--assessment/assessment/sea-screening-good-practice-2021.php>

The EPA is happy to discuss all aspects of this submission and looks forward to working with the Department and other stakeholders on the implementation of the Roadmap.

Sincerely,





¹ The EPA Research programme has two new AI projects starting this year and can provide further details on request.

Draft National Food Waste Prevention Roadmap Public Consultation Questions

DECC have provided a template below which contains questions you may find useful when making your submission. You don't have to answer all questions, and you are free to comment on any part of the draft Roadmap.

Note: In addition to the main body of the EPA response, comments from the wider EPA have been collated into this template.

Q 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?

The EPA welcomes the Roadmap and the inclusion of such activities as communication, sectoral support, measurement and monitoring, and training in the context of policy and legislative support will increase the likelihood of success. However, it would benefit from setting out some interim objectives and priority actions.

A peer review of EPA-led food waste prevention activities by WRAP in 2020 included recommendations to inform the development of a national strategic approach to food waste prevention. The Department should consider the recommendations for the development of a food waste prevention strategy for Ireland for delivering the 50% reduction target, and ensure these are reflected in the Roadmap:

- interim milestones e.g. 30% reduction by 2025
- clarity on the baseline and boundaries (i.e. farm to fork, and whether it includes primary production or not)
- Incorporate the measurement and reporting requirements of the EU and the United Nations for progress against the sustainable development goals
- A clear prioritization of different sub sectors within the Irish Food System for action, to make optimum use of limited resources.
- Clarity on roles and responsibilities of all the actors needed for delivering the strategy

Q2: What additional actions do you think would be effective in helping Ireland reduce its food waste?

The Roadmap should be unambiguous that prevention is the focus of actions, emphasising that prevention actions need to be prioritised in order to achieve the 2030 target to reduce food waste. For example, the titles Section 9 (Food Waste Prevention) and Section 10 (Food Donation) and Section 11 (Food Waste Segregation) give the impression that Section 9 is the part of the text that refers to food waste prevention. It would be worth renaming this section to clarify that this relates to the food waste actions from the WAPCE. Alternatively, these actions could be incorporated into the relevant parts of this Roadmap to show how the actions in the WAPCE are going to be implemented through the Roadmap.

A short section on interlinkages with sustainable food systems, eco-labelling and opportunities for synergies and value creation to the food and drink sector through the bioeconomy might be useful to highlight the wider context for the issue of food waste. It is suggested that this might sit best in an Appendix, so that the focus of the main document remains on food waste prevention.

It is disappointing not to see a stronger national commitment to eco-labelling of food, including – but not limited to - ‘food-miles’ information. A significant amount of food is wasted through ‘spoilage’ as a consequence of international supply chains. Moreover, some foods are also more resource intensive than others to produce. The policy should not just be about the prevention of food waste, but also have regard to the associated wastage in the production of food that is not consumed. For these and other reasons Ireland has to give consumers better signals in relation to the ecological rating of the foodstuffs consumed. The Eco-Labelling Regulation (REGULATION (EC) No. 66/2010) is a voluntary code for goods and services - which in itself is very disappointing. In addition to this disappointing current voluntary aspect for the universal application of the eco-labelling Regulation to goods and services, there is a further challenge in that it does not seek to include food. On this particular product group, it kicks the matter down the road for more study. Ireland needs to take leadership on promoting this labelling solution as it aligns with our ambitions to be a sustainable food producer. Consumers need better signals as these will assist better (and less wasteful) purchasing and consumption practices. It is also very difficult to see how GPP could be effectively applied to State spending on food (e.g. hospitals, universities, Institutes/colleges, & workplace catering) in the absence of a labelling scheme.

The Roadmap should also refer to the role of community groups and activists, and ‘bottom up’ actions. It would be important to ensure these actions are delivered in a co-ordinated way to maximise impact, avoid duplication of effort, and ensure consistency with national programme objectives.

Q3: What are the most effective awareness raising measures that could be taken to reduce food waste?

See main body of response.

Q4: Which sectors or stakeholders do you think should play a key role in the implementation of the Roadmap?

See main body of response.

Q5: Are you satisfied with the proposed Roadmap monitoring and evaluation arrangements?

See main body of response.

Q6: Have you any other comments or feedback on the content of the draft Roadmap?

The inclusion of feed is not included in scope of the roadmap should be considered.