

## FoodCloud's response to the public consultation on Ireland's National Food Waste Prevention draft Roadmap

### 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 publication of the food waste roadmap is a very positive first step. The creation of baseline data for 2020, by mid 2022, is also a key foundation to start the journey towards achieving the 50% target.

We believe that to achieve the ambitious target of 50% reduction by 2030 the roadmap needs to be strengthened in the following ways;

- **Frequency of monitoring and evaluation:** Given the tight deadline to 2030 the roadmaps current commitment to a review and update the roadmap every three years is insufficient. We would call for an annual review of the roadmap, to coincide with the publication of the annual food waste data, and potentially to be communicated via the annual food waste forum, where all stakeholders have the opportunity to contribute to the following years focus areas. An agile approach will allow for increased innovation and engagement from all the stakeholders.
- **Funding:** There is a significant cost for businesses and organisations to transition to a more circular, less wasteful food system. The roadmap highlights existing funding sources that are potentially available for food waste reduction initiatives but does not commit to any increased future funding sources. We would call for an objective of the roadmap to develop new and leverage existing funding sources to increase investment in food waste reduction innovations. By way of example, we have SEAI for energy efficiency projects for homes, communities and businesses, could something similar be considered for food waste reduction initiatives.
- **Responsibility / Structure for implementation** - It is not clear from the roadmap who will be ultimately responsible for achieving Ireland's target of reducing food waste by 50% by 2030. The roadmap outlines that "We will establish a Food Waste Prevention Task Force, comprised of representatives from key sectors and organisations, which will monitor the implementation and progress of the roadmap delivery." Likewise, the Food Waste Charter doesn't appear to have a clear coordinator or owner. It is not clear what department or organisation will be driving the roadmap forward and who will be responsible for its success, e.g in the UK this work is coordinated by WRAP and IGD. We would also hope that the taskforce be adequately resourced, this is a complex problem with the need for coordination of a lot of stakeholders and will need significant resourcing to achieve the ambitious targets.

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

Below outlines a number of additional actions that we think would be effective under each corresponding heading in the road map;

### Food Donation - Redistribution

We would support the inclusion of the following;

- A review of opportunities to increase the financial sustainability of the surplus food redistribution sector including a food industry contribution (i.e. repak) or a tax credit for food companies who engage in donation with the food redistribution organization getting a % contribution (e.g. similar to the model in the US). Note that the cost of redistributing surplus food is significant for both FoodCloud and the charities working with us. Currently retailers pay a fee that partially covers FoodCloud's running cost to provide a food donation service. Donors to FoodCloud Hubs do not make a financial contribution to support the cost of onward distribution to charities and then onto the ultimate recipients. For the ongoing financial sustainability of this sector a more sustainable financial model is required.
- The community and voluntary sector does not have the demand or capacity to take all of the surplus food that can potentially be made available from the food industry. We would therefore broaden surplus food redistribution to include support for and engagement with consumer facing platforms e.g. Olio, Too Good To Go, Foodie Save as other alternatives.

### The Food Waste Charter

The Food Waste Charter of 2017 was welcome and we support the fact that the roadmap includes consideration to extend the Charter to include other key sectors of the supply chain and a proposed revision of the charter to include specific measurement and reporting obligations and target-based reduction commitments. However, if a voluntary charter is to be effective it needs to have dedicated resources who are responsible for the coordination of the signatories, who can set objectives, monitor performance and steer the group to ensure that it achieves its objectives. It is not clear from the roadmap if resources will be allocated within the taskforce, or elsewhere. For example in the UK, IGD and WRAP have led an industry-wide programme of work developing the Food Waste Reduction Roadmap and WRAP are also responsible for coordinating the Courtauld Commitment (a voluntary agreement that enables



collaborative action across the entire UK food chain to deliver farm-to-fork reductions in food waste, greenhouse gas (GHG) emissions and water stress that will help the UK food and drink sector achieve global environmental goals)

### Research and Innovation:

A key area of the roadmap is supporting research and innovation. The roadmap points to various existing funding streams available. We would call for the roadmap to have an objective to increase funding available for research and innovation in this area.

- There are challenges with the existing funding sources mentioned in the roadmap, the Green Enterprise fund is a very competitive fund with a maximum grant of €100k per year and the maximum time frame for projects at 18 months. The CEIGS grant is only for organisations with 50 employees or less. The DAFM grant is an annual grant round of maximum €60K. While valuable, multi-year and more significant funding is required to support the transformative innovation required to meet the target. A lot of expertise is required to access LIFE funding and there could be more support offered to NGOs trying to access EU funding of this nature.
- Most of the funding outlined in the roadmap are aimed at the social enterprise and voluntary sector. As per the recommendation from our recent project within the primary production sector (see more below), there does not appear to be any grants available to producers / manufacturers to support investment in food reduction initiatives (similar to SEAI for energy efficiency projects) which would support food waste reduction but also potentially job creation and increase financial sustainability.

In order to achieve meaningful food waste reduction in line with our tight timelines we would suggest that the Food Waste Prevention Task Force also lead on collective action towards our targets. If we are to meet our 2030 objectives, we need to rapidly translate R&D, into innovation and action which will need significant funding. There are lots of examples of good practice in Ireland and internationally, some of which we have detailed below, we believe that the Food Waste Prevention Task Force, through the roadmap, have the opportunity to bring together data with research institutes, industry and funding to turn food waste into an opportunity to create a more sustainable, circular and secure food system for Ireland.

Examples: Meade Potato Company have recently started to produce [food grade starch](#) by extracting it from surplus potatoes and potato processing by-products, this is sold as a product in food manufacturing, In 2018, Country Crest diversified into food processing via fresh

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prepared meal business and established its sister company [Ballymaguire Foods](#). Other processor interventions include value-addition through “re-claiming” food at risk of waste for use as food ingredients for longer shelf-life products, e.g. Cream of the Crop, an Irish gelato company (2022); Rubies in the Rubble, a British social enterprise that makes jams and preserves (2021); SUNT Food, a Dutch social enterprise that makes banana puree and banana bread (2022); and Alchemic Kitchen, a British experimental development space that transforms surplus into products, supporting job creation and volunteering opportunities (2019).

### **Primary Production;**

The roadmap points to unpublished research on primary production. This has now been [published](#) and estimates the total annual FLW from Irish primary production was 189,508 tonnes. It would be good to see this referenced in the final draft of the roadmap.

FoodCloud recently completed a DAFM funded project with Munster Technological University. Some of the recommendations from that project are useful to consider as part of the food waste prevention road map so we have included a summary of the project here;

The core objective of this study was to investigate the potential for increasing redistribution of surplus food from the Irish horticulture sector to the charity sector, thereby reducing food waste and addressing food insecurity in Ireland. This study was carried out using 1) **desk-based research** involving interviews with and surveys of farmers about their food waste and donation experience and 2) a **pilot study of a compensated donation surplus donation fund**.

### **Key results:**

- Almost four out of five farmers have edible surplus (77%).
- One in four farmers experienced losses between 20-50% of their potential crop.
- Pathways without a direct financial return included leaving food unharvested (52% of farmers did this), use as compost or spread directly on fields (39% of farmers did this), donation of food (6%), or paying to have it removed for anaerobic digestion (3% of farmers did this).

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- There were two main pathways for achieving a partial financial return on the cost of production: animal feed (61%) and food processing (35%). Prices received for surplus ranged from €5-200/tonne, with an average of €51/tonne. The higher price-point reflects use for processing, especially as food ingredients, with an average price received of €150/tonne. The €150/tonne is not sufficient to cover the actual cost of production.
- The pilot resulted in the redistribution of 30,647kg of produce that would otherwise have remained unharvested or sent for animal feed, to 116 different community organisations were provided fresh vegetables. That equates to approx 72,969 meals equivalent. The estimated retail value of the produce amounted to €29,910 over the 5 month pilot period. Five new growers started working with FoodCloud as a result of this project and recovered €13,621 in costs by redistributing this produce rather than wasting it.

### ***Key recommendations***

It is recommended that this pilot project could be scaled up. It is estimated that over a three year period this project could rescue 993 tonnes of surplus food that arises within the horticulture sector. This would require funding of up to €375K per annum of which €166K per annum would be provided back to participating growers. However, a sustainable source of funding would need to be identified to support the project. This could be a government or private sector fund or there is an opportunity to explore a tax deduction or tax credit system, this would involve the extension of the “Charity Donation Scheme” beyond donations of a monetary nature to material goods such as agricultural products.

It is obvious that, even at scale, this project on its own will not address the overall problem of reducing edible farm level surplus. Therefore a number of further areas need to be explored;

- More collaboration between farmers and retail actors to develop better systems to manage retail specifications and innovate in this space, e.g. broadening retail specifications, marketing under-size vegetables as “minis” such as “tiny turnips”, and more communication with consumers about their influence, e.g. buying seasonal produce, and trying produce that is outside specifications, where available (e.g. misshapen vegetables).
- There is currently no financially sustainable marketplace for grade II produce and is currently going to waste. There is an opportunity to work to create a solution for this, by way of example, a social enterprise in Holland, [InstockMarket.nl - Instock](https://www.instockmarket.nl) has created a marketplace for producers to connect directly with the hospitality sector to trade surplus food. The viability of this solution in Ireland would need to be investigated further.

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- Investment in the horticulture sector to enable growers to take action on the area of farm level food waste. Some farms have invested in on-site processing technology, adding value to produce that might otherwise have low returns or become waste e.g McCann Apples, Meade Potato Company, Country Crest. These initiatives were observed on a few large farms that also aggregate produce, and on several fruit farms. There is the potential for more farmers to develop on-farm processing to valorise food that is at risk of waste. However, the initial investment and staffing costs, especially for small and medium-size farms, would require financial support, similar to that which has been provided by the Targeted Agricultural Modernisation Scheme (TAMS).
- Stronger coordination between fruit and vegetable farmers on this topic, including through farmer co-operatives, could strengthen farmer self-advocacy capacity, ensuring a better chance of success with engaging other food network actors, e.g. processors, retail, and consumers.
- Investment in FoodCloud (and other Social Enterprises) facilities and capabilities to increase ability to take large volumes of farm level edible surplus and either redistribute directly to charities or process into new products. This would include facilities to wash, sort, pack and store produce and also processing capabilities that could extend the life of the produce (e.g. juicing, meal preparation, product development). This would reduce the cost, resources and time required by the farmers to make the surplus product available and support in creating a financial sustainable market place.

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

#### Food waste awareness

- The roadmap supports training for the food industry, the hospitality sector in increasing awareness of food waste. We would also call for the inclusion of training and capacity building for community and voluntary organisations working in communities across the country to reduce food waste and increase food security. FoodCloud has a network of over 600 community organisations engaged in food sharing initiatives across the country. We believe that these organisations, working at a community level, have the potential to have a transformative impact in creating less wasteful and more sustainable and circular food communities and supporting the achievement of the target of a 50% reduction in food waste by 2030. Note FoodCloud have applied for funding for this type of project through the Climate Action Fund and the decision on that should be made in April 2022..

## **Education**

Education around the interconnectivity between food waste and climate change is essential for future generations. Currently there is significant awareness of the problem of plastic, however most people are not aware that the food we don't eat significantly contributed to global warming and ultimately impacts on our ability to feed ourselves in the future. Arguably this is as important as education around food safety training - when you consider that food safety training is essential for people working in the food sector and commonly delivered to second level students it would make sense that we have similar educational ambitions around food waste for citizens and food industry participants.

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

All sectors and stakeholders of the food industry need to be part of the implementation of the roadmap and it is recommended that each sector is name checked in the roadmap.

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

**Frequency of monitoring and evaluation:** Given the tight deadline to 2030 the roadmaps current commitment to a review and update the roadmap every three years is insufficient. We would call for an annual review of the roadmap, to coincide with the publication of the annual food waste data, and potentially to be communicated via the annual food waste forum, where all stakeholders have the opportunity to contribute to the following years focus areas. An agile approach will allow for increased innovation and engagement from all the stakeholders.

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

While we fully support the objective to reduce food waste we believe we should set targets that maximise the use of food for human consumption where food waste cannot be prevented or eliminated.

The global food system is experiencing shocks with increasing frequency, we have had 2 years of supply chain disruption and we now have the war in Ukraine which is going to have a significant impact on food security and in tandem we have a cost of living crisis. This is set against a backdrop of increasing population and frequent extreme weather events which impact adversely on food production.

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Any strategy or initiative that is being established to reduce food waste must go further to consider environmental and social impact in parallel. We have the opportunity as part of this Roadmap to elevate the use of waste, recycling and animal feed streams to ensure as much food as possible is retained for human consumption. The importance of this cannot be stressed enough in these uncertain times.

We strongly advocate for retaining food in the human supply chain. We would like to see this roadmap adopt a world leading position of ensuring that it is not easier, financially attractive or deemed acceptable, for any actors in the food supply chain to redirect food suitable for human consumption to lower tiers on the food use hierarchy. We suggest that as part of the roadmap the % of food waste redistributed or redirected for human consumption is measured and that targets are set that focus on maximising this rather than simply keeping food out of landfill.

