



Draft National Food Waste Prevention Roadmap

Food Drink Ireland submission

March 2022

Food Drink Ireland (FDI) is the main trade association for the food and drink industry in Ireland. It represents over 150 food, drink and non-food grocery manufacturers and suppliers. FDI welcomes the opportunity to input into the consultation on a Waste Action Plan for a Circular Economy.

The food and drink industry in Ireland supports a full domestic supply chain from farm to fork (as well as a parallel overseas chain of imports and exports). It interacts with a wide range of economic and social interests across Ireland. The sector is committed to being part of a circular economy and is working with suppliers, retailers and consumers to support sustainable consumption patterns. Food and drinks companies will continue to improve the circularity and environmental performance of our products wherever possible while ensuring the highest level of quality and safety of food and drink products for consumers.

Ireland has much to be proud of when it comes to waste management. Businesses are also investing in many positive changes in their own processes and practices, some of which are highlighted in this submission.

Draft National Food Waste Prevention Roadmap - Public Consultation Questions

- 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:

Food Drink Ireland welcomes the development of a National Food Waste Prevention Roadmap and broadly agrees with the outlined approach in the draft Roadmap to reduce Ireland's food waste by 50% by 2030. The draft Roadmap re-affirms the Government's commitment to UN Sustainable Development Goal 12.3 to reduce food waste by 50% by 2030. Food and drink businesses in Ireland are actively playing their part in working towards this goal, through a range of initiatives.

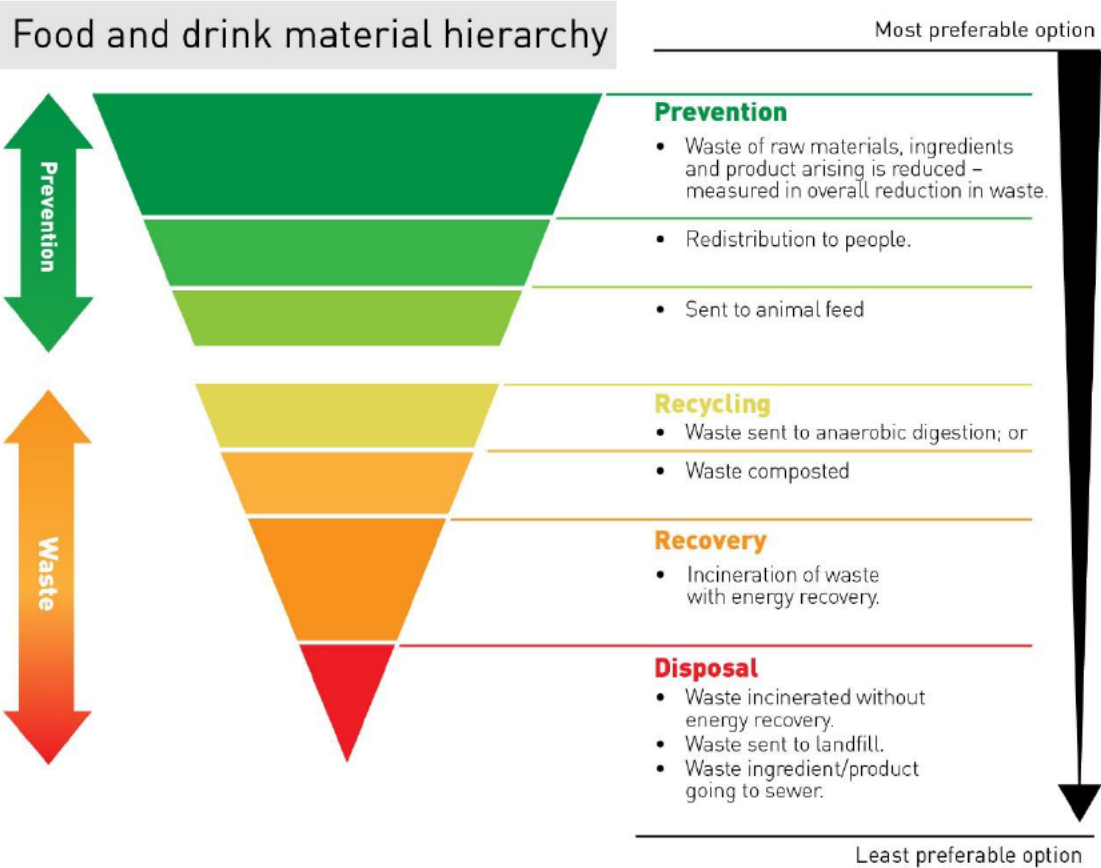
Many companies use WRAP UK's adaptation of the waste hierarchy for food and drink material (see below) to prioritise their food waste reduction actions.

Food Drink Ireland members have many examples of company-level initiatives to reduce food waste in line with the WRAP hierarchy:

- Rigorous supply chain management aimed at reducing surplus stock.



- Clear 'use by' and 'best before' date markings on products to reduce food waste in the home.
- Redistribution of surplus food and drinks nearing the end of their shelf-life, for example by working with FoodCloud, a social enterprise that connects businesses with surplus food to charities. Strict standards must be met for donations to ensure the highest levels of food safety. Some companies give financial and other supports to FoodCloud in addition to donations.
- Processing of food waste that is not edible or desired by humans into pet food. In a meat factory, this provides a solution for by-products such as offal or blood.
- Converting food waste into bioenergy through anaerobic digestion. There are only a handful of anaerobic digesters in Ireland, compared with about 60 in Northern Ireland, so this is an area with significant growth potential. As the digesters tend to be farm-based, they can also serve to aid on-farm diversification in an environmentally sustainable way. In Germany and Austria, encouraged by favourable government renewable energy policies, there are several thousand on-farm digesters treating mixtures of manure, energy crops and restaurant waste, with the biogas used to produce electricity. Supports would be necessary for the development of anaerobic digesters in the Republic of Ireland. This not only addresses food waste but also provides additional feedstock for a domestic energy source.





FDI welcomes the Roadmap's acknowledgement that there is considerable uncertainty over food waste amounts in the processing and manufacturing sector. The Food and drink sector acknowledges that it has a key role to play in reducing food waste but allocating almost half of the 1.1 million tones of food waste generated in Ireland in 2019 to the processing and manufacturing sector seems to be an overestimate. For this reason, FDI welcomes the Roadmap's approach to food waste measurement and reporting. Work which is being currently carried out by the EPA to establish reporting methodologies for each sector and develop the 2020 reference year data combined with quality check reports on data collected will help verify the quality of the data and improve data collection.

Food Drink Ireland support a shared approach to food waste set out in the Roadmap by all actors at each stage of the food chain. This could include commitments to sustainable practices and a joint exploration of facilities/partnerships to redistribute food waste. This approach would recognise better use of by-products of food production systems so that they can be inputs into other processes rather than waste. It would also identify and provide a forum to address inconsistencies along the food chain. For example, currently, specification standards for farm produce result in surplus produce that fails to meet the set standard (e.g., irregularly shaped vegetables). As farm produce varies in quality by nature, this surplus should have an appropriate market outlet.

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

Response:

Central to continuous progress in reducing food waste is the adoption of a robust measurement methodology. Some companies are already using the Champions 12.3 methodology (champions123.org), which has been developed at an international level, along with guidance and reporting templates from WRAP ('Target, Measure, Act' approach). This allows progress to be tracked overtime on a like-for-like basis.

Given the complexities of detailed food waste reporting, Food Drink Ireland would suggest adopting an existing, respected framework that companies may already be familiar with through their UK or other operations. This would also benefit companies operating on an all-island basis, reducing costs and increasing the comparability of data. Food Drink Ireland would support a measurement methodology that allows companies to offset food donations against overall food waste. Part of the development of a reporting system is the need to change the way we think about food waste, to better define what is 'waste' what can be reused.



The Environmental Protection Agency has already begun working intensively with the retail sector on a collaborative basis to reduce retail food waste. This tailored, consultative approach should be rolled out to other parts of the food chain, in order of priority according to the proportion of food waste generated.

The need for legislation similar to the Good Samaritan Act has been recognised in the Waste Action Plan for a Circular Economy. This should be prioritised to support the development of reuse and donation models.

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

Response:

A collaborative science-based approach ensuring all actors in the supply chain play a role is key in effective awareness arising measures. Citizen engagement can be difficult to achieve but households and individuals must play their part if Ireland is to reduce its food waste by 50% by 2030. Public discourse on environmental issues has never been stronger but the challenge in the context of this consultation is to channel this into actions that will have a meaningful impact. It is important to avoid knee-jerk reactions in favour of clear messaging around science-based steps that individuals can take. Robust science must underpin all Government communications to citizens.

One example of a successful communication and behaviour change campaign is the Gum Litter Taskforce, which is a joint initiative of the chewing gum industry, Department of the Environment, Climate and Communications, Food Drink Ireland and local authority representatives. The campaign involves extensive media activation, the 'Bin It!' school tour and a series of launch events with local authorities. Since the campaign was launched in 2007, the proportion of gum as a percentage of litter has decreased by 70%. In the most recent evaluation, 55% of people said the campaign is likely to make them stop dropping gum. More information is available on www.gumlittertaskforce.ie.

Other examples of effective initiatives:

- Clear 'use by' and 'best before' date markings on products.

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

Response:



All sectors have a key role to play. Tackling food waste means working together with all stakeholders to better identify, measure, understand and find solutions to deal with food waste. There is not one single cause with one solution because the food chain is a complex and dynamic system. All actors in the food chain should work together to find solutions, from farmers, processors, manufacturers, and retailers through to consumers themselves. Other food sector experts, research scientists, food banks and NGOs also play an important role.

The Government and the EPA also have a key role to play to ensure that consumers are educated on how to prevent food waste. The Government must also ensure there are supports for all sectors of the supply chain to implement food waste prevention initiatives, be that through training programmes, school initiatives or innovation and research.

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

Response:

FDI agree that the proposed Food Waste Prevention Task Force should be established and that a review of the Roadmap should occur at least once every three years. The Food Waste Prevention Task Force should have a set frequency of meetings each year with dates communicated well in advance.

The development of sub sectoral groups that engage with each of the stages of the food supply chain should be established, particularly for the processing and manufacturing sector. Sub sectoral groups must be formed to focus on specific areas of the supply chain. These sub-groups will bring together industry experts that will be most familiar with the regulatory and non-regulatory barriers.

FDI would greatly appreciate being invited to participate in the Food Waste Prevention Task Force and also the Food Waste Prevention Task Force sub sectoral group for the processing and manufacturing sector.

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

Response:

In terms of how Ireland can become a 'farm to fork' global leader in food waste reduction, it is important to acknowledge the already world-leading Origin Green programme that many food companies are involved in through Bord Bia. Origin Green is Ireland's pioneering food and drinks sustainability programme, which provides a framework for Ireland's food industry to set and achieve measurable sustainability targets that respect the environment and serve local communities more effectively. Origin Green is about measuring and improving on an ongoing basis. Independent accreditation and verification are built into every stage of the supply chain.

Food waste and packaging

Often food waste and packaging waste are dealt with as separate issues, however, they, are closely linked and cannot be considered in isolation. Packaging is essential to bring many foods and beverages



to our tables. It has several important functions, one of the most important being to reduce food waste. Because of effective packaging processes, food wastage rates (pre-consumption) are 2-4% in industrialised countries. This compares with 50% in developing countries.

Zero Waste Scotland has published a report clearly stating that food waste is now a greater contributor to the global climate crisis than plastics. Two comparisons are vital to bear in mind when discussing food packaging:

- The environmental impact of avoidable household food waste is eight times greater than the impact of total packaging waste going to landfill.
- Ten to fifteen times more energy and materials are locked up in household goods/food than in the packaging around them.

For this reason, no measures taken on packaging should increase food waste. This is critical as several member companies have advised FDI that trials of new packaging have recorded a reduction in shelf-life and an increase in food waste.

Developing a domestic biomethane industry can play a significant role in reducing food waste that would otherwise be destined for incineration or landfill while simultaneously supporting Ireland in reducing its dependency on imported fossil fuels. Developing a domestic biomethane industry will also provide significant opportunities for rural communities and facilitate sustainable circular economies. The Russian Invasion of Ukraine has exposed the fragility of Europe's energy system, its over-dependence on fossil gas from Russia, and failure to decarbonise and diversify its energy mix since the energy crisis of 2008. Ireland is acutely exposed to energy cost increases and energy supply challenges because of our increasing dependence on imported gas. Ireland is uniquely well-positioned to exploit biomethane which can help reduce its dependency on imported gas, through the use of anaerobic digesters. Farmers and the food industry are set to play a key role in turning energy from waste, such as agricultural waste and food waste, into heating. The Government need to work with EU partners to use CAP funding to support biogas production in rural areas and promote opportunities in the biogas sector.

Food Drink Ireland is keen to work with DECC, as well as other departments and agencies such as the EPA, to deliver the reductions necessary to halve our food waste by 2030, meet any other related targets, and promote our transition to a circular economy.

For further information about any of the points raised in this submission, please contact 