

Consultation Response  
'Public Consultation on the Draft National Food Waste Prevention Roadmap  
Waste Policy and Enforcement Division  
Department of the Environment, Climate and Communications  
Newtown Road  
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By email

Irish Bioenergy Association (IrBEA)

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From: [REDACTED] and [REDACTED]

To: [foodwaste@decc.gov.ie](mailto:foodwaste@decc.gov.ie)

24th March 2022

**IrBEA Response to Public Consultation on the Draft National Food Waste Prevention Roadmap**

Dear DECC,

Thank you for the opportunity to respond to this consultation on behalf of our members. The Irish Bioenergy Association (IrBEA), as a representative body for the bioenergy sector on the island of Ireland, represents and advocates on behalf of members in the biogas, biomass, biofuels, energy crops, wood fuels and biochar sectors.

We look forward to working with you on behalf of our members to further the development of the food waste prevention roadmap into the coming decade and to ensure that the food waste hierarchy continues to be followed. Where prevention isn't possible, we would like to work to ensure that generated food waste would service the growing bioeconomy and bioenergy sectors.

Please find listed below, a number of observations and remarks on the draft consultation document.

## Consultation Draft – remarks

- The approach outlined in the draft rightly places a firm emphasis on the need for accurate baseline measurements and data collection regarding the quantities of food waste being generated, broken down by sector, each year.
- This essential first step will form the basis of any reduction measures and will allow decision makers and stakeholders not only monitor progress but also to identify opportunities within supply chains for the provisions of good and services.
- The current blind spot with regards the quantification of the levels of waste coming from our primary producers must be addressed as a priority. Consideration could be given to the characterisation of qualification of these wastes as this data may provide valuable information for the reuse and valorisation of these diverse waste streams within the growing bioeconomy and bioenergy space.
- Inedible fractions of food waste, from primary production through to domestic level, will prove harder to reduce than edible fractions. However, these fractions could serve the bioeconomy and bioenergy sectors.
- As a representative body for the bioenergy sector, IrBEA would welcome increased recognition of how the developing biogas industry in Ireland can aid in the valorisation of non-preventable food waste fractions.
- IrBEA and CRÉ produced a joint policy paper in 2019 on the mobilisation of an Irish Biogas Industry which outlined the role that food waste could play in the production of biogas.<sup>1</sup>
- The biogas industry in Ireland can play a vital role in the provision of heat <sup>2</sup>, electricity, renewable gas or biomethane for decarbonising road transport.<sup>3</sup>
- The prevention roadmap, and in particular, the food waste hierarchy (figure 1 in the consultation document), gives recognition to the potential for nutrient recovery from the digestate fraction of AD but makes no mention of the value to be found in the biogas/biomethane itself in the broader emissions reduction agenda.
- Nutrient cycling and the use of digestate is also likely to play an increasingly important role in reducing our dependence on imported agricultural inputs (chemical fertiliser).
- The biogas sector has multi factorial benefits addressing climate action, emissions reduction, reducing the carbon footprint of farming and promote the economic, growth and jobs agendas.

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<sup>1</sup> [https://www.irbea.org/wp-content/uploads/2019/08/IrBEA-Cre-Biogas-Policy-Paper-Final\\_1.pdf](https://www.irbea.org/wp-content/uploads/2019/08/IrBEA-Cre-Biogas-Policy-Paper-Final_1.pdf)

<sup>2</sup> [https://renewableenergyireland.ie/wp-content/uploads/2021/05/Renewable-Energy-Ireland\\_Renewable-Heat-Plan\\_-\\_Final.pdf](https://renewableenergyireland.ie/wp-content/uploads/2021/05/Renewable-Energy-Ireland_Renewable-Heat-Plan_-_Final.pdf)

<sup>3</sup> <https://www.marei.ie/wp-content/uploads/2021/12/Irish-Bioenergy-Association-UCC-MaREI-Renewables-In-Transport-Report-Final.pdf>

- IrBEA acknowledges the draft’s recognition of the need for research and innovation in the sector and would call on measures to be further enhanced, strengthened, and resourced.
- Enhanced segregation measures and initiatives will be essential in ensuring prevention measures prove successful in achieving the stated level of ambition regarding the 50 % reduction target.
- Society’s shift towards a more circular economy approach of handling our wastes and resources should be recognised and supported through favourable policy measure which bring this to a reality. An example of industry’s current contribution to this approach through IrBEA member Green Generation can be found here: <https://www.irishtimes.com/news/environment/plastic-revolution-advances-in-recycling-promise-a-cleaner-future-1.4670624>
- Openness, transparency, and a willingness to collaborate across a range of sectors, industries and agencies will also play an important role in the success of any interim targets and prevention measures implemented.
- Ongoing, sustained, targeted, and effective communication campaigns across all aspects of society will also be vital in the success of any reduction and prevention efforts.

In conclusion, IrBEA would welcome an opportunity to meet and discuss with the Department our input and the results of this consultation and to support the development of this roadmap where the role of bioenergy and in particular, biogas production from food waste, is recognised.

Yours sincerely,

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