

Consultation on the Draft National Food Waste Prevention Roadmap 2022



**An Roinn Comhshaoil,
Aeráide agus Cumarsáide**
Department of the Environment,
Climate and Communications



Consultation Response on the
Draft National Food Waste Prevention Roadmap 2022

Prepared by
The Irish Food Packaging Alliance
(IFPA)

Consultation on the Draft National Food Waste Prevention Roadmap 2022

About the IFPA

The Irish Food Packaging Alliance (IFPA) is the representative organisation for the domestic food packaging producers in Ireland. IFPA is committed to the development of a truly circular economy whereby all plastic products are recycled. Our members are calling on Government to engage with all stakeholders involved in the product life cycle with a view to developing a commercial waste stream for all plastic packaging and therefore creating a sustainable approach to reducing the climate and ecological impact of plastic waste.

All queries in relation to this document should be addressed to 

Consultation on the Draft National Food Waste Prevention Roadmap 2022

The Irish Food Packaging Alliance (IFPA) welcomes the opportunity to make the following submission to respond to the Public Consultation on the Draft National Food Waste Prevention Roadmap. The IFPA members acknowledge the requirement to transform the way in which we as a society produce and supply food, in order to improve circularity, meet our carbon reduction targets, and thus take tangible action to address the climate emergency.

With significant expertise in the design and manufacture of plastic food packaging we are already advanced in our journey to becoming a more circular sector, however, significant barriers remain to achieving Ireland's carbon reduction targets which we will seek to address in this submission.

In this regard, we have addressed only those questions from the consultation which are pertinent to our areas of expertise and are of value to the development of the Roadmap to reduce national food waste as it relates to reducing overall carbon emissions.

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 IFPA is fully supportive of measures which significantly reduce food waste in line with the Roadmap. As experts in the manufacturing of plastic food packaging, we are conscious of the role our products play in the wider context of the circular economy.

Our members are fully supportive of measures which effectively reduce Ireland's carbon emissions which includes developing more sustainable materials for recycling as well as extending the product life cycle of food. However, as outlined in the Roadmap, Ireland creates approximately 1.1 million tonnes of food waste per year, which represents a carbon footprint at an estimated 3.6 Mt CO₂e². Plastic food packaging plays an important role in preventing food waste (detailed further below) and must continue to do so if Ireland is to reduce its food waste and effectively tackle its carbon output.

We would urge that those involved in the development of the final roadmap and its implementation raise awareness across government, of the importance of food packaging to reduce carbon emissions. In the context of Ireland's legally binding target of net-zero greenhouse gas emissions by no later than 2050, and a reduction of 51% by 2030¹, food packaging must play an important role and related policies must steer society towards the use and effective recycling of necessary plastic.

¹ <https://www.gov.ie/en/press-release/16421-climate-action-plan-2021-securing-our-future/#:~:text=The%20Climate%20Action%20Plan%20follows,of%20the%20Programme%20for%20Government.>

Consultation on the Draft National Food Waste Prevention Roadmap 2022

The relevant areas within the Roadmap approach where our members and their products have an effective input and positive impact are detailed below.

SUPPLY CHAIN: Plastic packaging has a significant role to play in the food supply chain and the positive reduction of food waste in this regard. Plastic packaging plays an important role in the following stages of a product life cycle as outlined in the Roadmap:

- **Manufacturing and Processing:** Plastic packaging reduces food waste through avoiding slippage, bruising and damaging of soft items, which would render them no longer suitable for sale. It also helps by forming a barrier which protects food from light, air and moisture all of which are agents which accelerate the perishability of fresh foods.
- **Retail and distribution:** The protection provided by plastic packaging prolongs the shelf-life of products by delaying the process of biodegradation including discolouration, as well as a loss of flavour, vitamins and proteins, all of which make a product less desirable for the customer. This makes the likelihood of purchase and hence consumption less likely, consequently increasing food waste either at a retail or in the home setting.

As in the manufacturing and processing stage, packaging continues to play a role in reducing slippage and breakage during distribution, allowing for a far more efficient distribution of products as well as extending the life of fresh products.

For instance, a producer must fill, store and handle packages, and a transport provider strives for efficient loading and unloading as well as volume- and weight-efficient packaging to obtain sufficient load factors. Warehouse and store operators must pick, stack, store and replenish products efficiently. Packaging enables this. A holistic view on packaging performance that includes the whole supply chain, can enable cost and time efficiency from improved logistics, transport and reduced product waste.

Owing to consumer trends, much of the produce which Irish consumers purchase is imported. These are regularly products which are not grown domestically and require many stages and handlers to deliver them from their origin to the point of purchase. As outlined above, in many cases packaging is important to deliver them in a ready-to-buy state.

It is for these reasons that blunt policy instruments such as bans on plastic packaging are ineffective in the context of reducing our carbon footprint. While France, for example, has introduced a policy to remove

Consultation on the Draft National Food Waste Prevention Roadmap 2022

packaging from approximately 30 fruits and vegetables, the Irish and French markets are incomparable due to the ability of France to produce more of these products domestically, reducing many stages in the products journey from origin to consumer.

Were Ireland to introduce such a ban, it would produce unintended consequences including likely increasing our carbon footprint through greater food waste while also rendering some products unviable for the Irish market.

DATA & COMMUNICATIONS: Aligned to our ongoing engagement with the Department of Environment, Climate Action and Environment and our participation on the *Waste Management Group* we believe a major emphasis must be placed on the accurate establishment of baseline data, subsequent reporting and the communication of same to all stakeholders.

Accurate measurement is essential for meeting our mandatory EU targets but also to ensure that Ireland's Climate Action Plan and associated work programmes are credible in the eyes of all stakeholders. This credibility must be engendered among those involved in the food chain and also the general public through external communications and in public awareness campaigns.

IFPA members believe this will be essential to ensure the wider buy-in to food waste prevention and hence reduction. In this regard, accurate data will be vital to all aspects of the circular economy strategy.

Consideration should also be given to what actions should be taken against organisations which make false or unsubstantiated claims when it comes to carbon reduction, waste prevention or effective recycling of materials.

Consultation on the Draft National Food Waste Prevention Roadmap 2022

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

As highlighted in the Roadmap, food waste is a huge source of carbon emissions. Approximately 30% of global greenhouse gas emissions are related to food. One quarter of all food produced is lost. Avoiding food waste can reduce our overall carbon footprint by up to 10%.²

Due to its protective function, plastic food packaging reduces food waste at several stages of the production supply chain. While hard to quantify exactly, the environmental benefit of avoided waste is usually 5 to 10 times higher than the environmental cost of the packaging. Product protection pays off especially for food products with resource intensive production (e.g. meat, cheese). The opportunity cost of packaging versus unpackaged is clear in this regard.

Furthermore, responsible packagers such as the members of the IFPA are engaged in eco-design to maximise the potential to recycle their products. Optimised packaging provides the required product protection, uses as little material as possible and is recyclable or reusable wherever possible. Sustainable packaging solutions can be slightly more expensive, however, the additional costs are often offset by reduced waste and other benefits.

There is no packaging material that is good or bad in itself. When choosing the material, necessary packaging functions and low environmental impacts should be harmonised. In this regard, policy makers must engage in joined up thinking and avoid crude policy instruments such as bans or levies on plastic products without engaging in a carbon assessment for any such policy tools.

“Design for Recycling” or for ‘Re-Use’ and the use of recyclable material should lead to improved environmental effects throughout the life cycle. The development of optimised packaging and the further reduction of food waste is particularly successful if the stakeholders concerned cooperate along the supply chain under the guidance of clear policy. In this regard, clear policies and leadership will be essential.

Holistic assessments (technical, environmental, economic) help to find solutions that are actually sustainable. The prevailing narrative that all plastic is bad cannot be allowed to affect robust evidence-based policy. In this regard a public awareness campaign must be undertaken to educate the public as to the role plastic plays in avoiding food waste and hence, lowering carbon emissions. Consumers should be increasingly informed about the benefits and function of packaging alongside how to dispose of it correctly.

² <https://www.epa.ie/our-services/monitoring--assessment/circular-economy/food-waste/#:~:text=Food%20waste%20is%20also%20a,therefore%20an%20effective%20climate%20action.>

Consultation on the Draft National Food Waste Prevention Roadmap 2022

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

The IFPA is eager to be a collaborative partner with government and its agencies in the development and roll out of the Roadmap. It looks forward to collaborating with all pertinent stakeholders in the development of the final roadmap and its implementation.

From our perspective the sectors which will play a key role in the implementation of the roadmap are those businesses and stakeholders involved in the manufacturing of packaging and its recycling. These stakeholders will be essential to both the reduction of food waste and also the effective reduction of Ireland's carbon output which must be the overriding goal of society.

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

While reducing plastic waste is rightly a policy priority in areas where circularity cannot be achieved, this should not come at the expense of increasing our overall carbon footprint. Our members have grave concerns regarding the promotion of "packaging free" options among consumers, without close consultation with the packaging and food sectors and consideration of the unintended consequences this could have on food waste targets which impact overall carbon reduction targets.

Plastic packaging helps keep our food fresher for longer, meaning that we reduce food waste. Plastic helps protect perishable food items from light, oxygen, water and CO₂, all of which are mediating factors in food degradation. The shelf life of meats such as beef for example can be extended by as much as 5 days with the use of plastic packaging, while fresh vegetables such as cucumbers can be extended by two weeks.

Consultation on the Draft National Food Waste Prevention Roadmap 2022

Food	Alternative packaging	Plastic packaging
Steak 330 g	34% food waste (foil)	18% waste (composite foil)
Cheese Bergbaron	5% food waste (open sale)	0.14% food waste (plastic tray with foil)
Cucumber 350g	9.4% food waste (open sale)	4.6% food waste (PE film)
Bread 400g	11% food waste (open sale)	0.8% food waste (PP film)

According to the United Nations, if food waste were a country, it would be the third largest global greenhouse gas emitter, behind only China and the United States. Ireland generates approximately 1.1 million tonnes of food waste per year, which represents a carbon footprint as high as 3.6 Mt CO₂eq. Around 60% of this comes from the household and commercial sector. The GHG benefit from prevented food losses as a result of using plastic packaging to protect fresh food is estimated to be at least equivalent to 37% of production emissions of all investigated plastic packaging in a recent study.

Research conducted by Austrian environmental consultancy, Denkstatt, found that food sold without packaging resulted in between x2 – x14 waste.³ Food waste is the world's second largest contributor to greenhouse gases, accounting for 8% of global emissions.⁴ Hence the use of plastic packaging to protect food integrity, prolong shelf-life and reduce overall food waste can in fact have a net positive impact on GHG emissions, as is evidence by separate research from Denkstatt.⁵

In this regard we would urge that any policy directed at eliminating packaging must first have a carbon impact assessment carried out to ensure it is having a positive effect on Ireland's carbon footprint. Increased plastic waste is a significant issue, but simply banning or moving away from plastics products is not a viable solution. In this context we are continuing to engage with all relevant stakeholders regarding Ireland's recycling infrastructure.

³ [https://www.save-food.org/cgi-bin/md_interpack/lib/all/lob/return_download.cgi/3 Interpack 2017 denkstatt Packaging Food Waste Prevention V1.0.pdf?ticket=guesst&bid=5684&no_mime_type=0](https://www.save-food.org/cgi-bin/md_interpack/lib/all/lob/return_download.cgi/3%20Interpack%202017%20denkstatt%20Packaging%20Food%20Waste%20Prevention%20V1.0.pdf?ticket=guesst&bid=5684&no_mime_type=0)

⁴ Food wastage footprint & Climate Change, the Food and Agriculture Organization of the United Nations.

⁵ The impact of plastic packaging on life cycle energy consumption and greenhouse gas emissions in Europe, Denkstatt, 2011

Consultation on the Draft National Food Waste Prevention Roadmap 2022

While the members of the IFPA are willing to do their part, a further aspect of this system which must be addressed is the usage of necessary food packaging when it has served its initial purpose.

In our efforts to reduce food packaging, a truly circular economy will include the development of a thriving domestic recycling infrastructure. The IFPA believe that plastic packaging has an important role to play in our national efforts to reduce our carbon footprint. That said, we want to see a greater commitment from Government to support the appropriate management of virgin plastic once it has served its initial purpose.

While we are encouraged to see that the Roadmap supports the design and roll out of packaging that meets the needs of food preservation without encouraging the generation of packaging waste, especially plastic packaging (Section 9 Pg 13), this can only be achieved by the development of a strong domestic recycling industry. Where possible, plastic which is used in Ireland should be recycled for reuse domestically.

Case Studies

As referenced earlier in this document, the IFPA members acknowledge the requirement to transform the way we produce our goods in order to improve circularity, meet our carbon reduction targets, and thus address the climate emergency. Below, IFPA members have shared examples – both in rigid and soft plastic – of the efforts they are making to drive circularity in their businesses from eco-designing their products to recyclable materials, to developing new processes which will help increase PET collection rates in Ireland.

Recyclable Packaging: 100% Polyethylene Mono-Material

Conscious of the need to innovate to develop more sustainable packaging solutions, and in response to the Government's requirement for Member States to implement eco-modulated EPR fees, IFPA member Alert Packaging has developed a 100% polyethylene mono-material packaging option which is completely recyclable. This is a preferred format for many multiples including Tesco and Aldi with others following suit.



This flexible material can be deployed for a range of packaging solutions and formats including pre-made stand up pouches and roll fed film for form fill & seal, pillow packs or sachets. These products are ideal for a range of existing products including:

- *Grains and nuts*
- *Confectionary / Snack Foods*

Consultation on the Draft National Food Waste Prevention Roadmap 2022

- *Pet food*
- *Protein bars*

This recyclable material provides a strong barrier against oxygen, aroma, flavour and mineral oils providing producers with a high quality and adaptable product. This is complemented by an excellent moisture barrier on the surface and seal. Furthermore, this product is chlorine free and contains no PVdC. Collectively this ensures that producers and retailers get a product that is effective, attractive, and most importantly, sustainable.

The use of polyethylene as a flexible packaging stands up to the major circular economy principles of reduce, reuse and recycle.

Flexible packaging means more with less: less waste, less energy, less resources used and reduced costs. Flexible packaging packs more than 40% of food products in Europe while only using 10% of all consumer packaging materials. Flexible packaging allows for outstanding low packaging-to-product ration, while helping to reduce food waste. New Print Technology of fixed and expanded breadth allow for reduction in ink usage whilst not compromising brand / design excellence, indeed customers have found it shortens the product introduction cycle.

Flexible packaging is essential for processing, storing, transporting, protecting and preserving products. Re-closable packs such as plastic stand-up pouches help to keep food that has been opened in peak condition for longer. Ultimately, multi-use packaging which is more effective and efficient means there is less waste of resources, and thus the impact on the environment is reduced.

The product is already in use on a range of products in the leading multiple retailers across Europe and in the UK.