



Public Consultation on the Draft National Food Waste Prevention Roadmap
Waste Policy and Enforcement Division
Department of the Environment, Climate and Communications
Newtown Road
Wexford
Y35 AP90

By email only to foodwaste@decc.gov.ie

24th March 2022

Re: Public Consultation on the Draft National Food Waste Prevention Roadmap

Dear Sir/Madam,

Further to your call for consultation on the above-referenced subject, I offer the following responses and comments on behalf of the Irish waste Management Association (IWMA). The IWMA is comprised of 56 members that operate more than 64 waste management companies.

Our website, www.iwma.ie, provides details of our members. Note that some members have acquired other companies in recent years and therefore trade under several brand names. Here are some slides from a presentation showing our members' logos:

IWMA Members – Non-Hazardous



IWMA Members – Hazardous



IWMA Members – Metal Recyclers



Our members handle household, commercial, C&D, metals, liquid and hazardous wastes and are involved in the following waste management activities:

- Waste Collection
- Waste Transfer
- Recycling Operations
- Metal Recycling
- Composting
- Anaerobic Digestion
- Hazardous Waste Management
- Specialist Treatments (such as Sterilisation)
- Soil Treatment and Recovery
- Waste to Energy
- SRF Production
- Landfill Operations
- Export of Waste for Treatment Abroad

It is clear that the IWMA represents a broad spectrum of waste management activities, so we have no inherent bias towards or against any particular waste management options. Our main goals are to raise standards in the industry, to promote compliance with all legislation and to assist Ireland in meeting the targets set by the EU in a variety of Directives. All our submissions are available publicly on our website.

Opening Comments

The IWMA supports food waste prevention, but we do not support prevention or reduction of non-food biowaste that is used as feedstock for composting plants and anaerobic digestion plants. We raised this issue with the DECC¹ and the EPA at a meeting on 9th September 2020 and we attach our minutes of that meeting in Appendix 1.

The position of the DECC and EPA appears to be entirely unmoved from the position that we challenged at our meeting 18 months ago. We hope that this submission has a greater impact as this issue poses a serious threat to biowaste management in Ireland, with consequential environmental impacts.

We understand from the Draft Roadmap, that the definition of food waste is not yet finalised. However, it appears that the data in the consultation document and in the EPA documents that inform it, includes non-food biowaste (such as skins, peelings, shells, grass, etc.) are being included in the 1.1 million tonnes of estimated 'food waste'.

We fear a number of unintended consequences will arise from inclusion of such material in waste prevention measures, such as the following:

- One way to prevent the generation of peelings, skins, shells, etc in Ireland is to import pre-processed fruit and vegetables that have had their non-edible parts removed in another country. This is surely not a good option in the context of packaging waste and in terms of the health and wellbeing of the citizens of this country, so these non-edible parts of plants and animals should not be included in waste prevention measures in Ireland.
- A serious concern for our members is the likely impact on investment in composting and anaerobic digestion plants in Ireland, if and when the Government sends a signal to the market that feedstock for those plants will be halved by 2030. A failure to develop new infrastructure for the treatment of biowaste in Ireland will lead to export of that material or the use of other treatment methods that are lower in the waste hierarchy.
- With the reduction in peat harvesting in Ireland, for environmental reasons, it is more important now than ever that we produce compost and digestate for use in horticulture as a peat replacement. Raw materials are needed to produce that compost and digestate and we believe that the best raw materials are unavoidable biowaste combined with garden waste. There is no environmental case to reduce that feedstock and it is imperative that the Government of Ireland makes that case to the EU Commission before a blunt instrument is used, that has negative environmental consequences.
- As the world reduces reliance on fossil fuels, for environmental reasons, it is important that Ireland increases production of biomethane. Biowaste is an excellent feedstock for anaerobic digestion plants that produce biomethane and while we accept that food should not be wasted, a large portion of biowaste suitable for AD plants is unavoidable/inedible food waste such as skins, peelings, etc. There is no environmental case to reduce that

¹ Formerly DCCAE

element of the feedstock for AD plants, so food waste prevention measures must be limited to avoidable/edible food waste. Without this waste feedstock, AD plants would require energy crops as feedstock and those energy crops would be grown on land that could otherwise be used for the growing of food crops.

We therefore must insist that Ireland targets 'wasted edible food' and not the broader biowaste fraction, which is regularly referred to as 'food waste', which we consider to be an inaccurate description. Ireland must lobby the EU on this point or this waste prevention measure will have some very negative environmental consequences.

Specific 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 ?

No. The term 'food waste' is used too broadly in the draft Roadmap and as unavoidable waste derived from food products makes up the majority of that material, it cannot possibly succeed. The task must be focussed entirely on avoidable wasted food if it is to have any chance of success.

Ireland should also lobby the EU Commission to compare 'wasted food' per capita across the EU, particularly at household level, as this is a sharper tool that compares like with like. We believe that Ireland is doing well by that measure and reducing a figure by 50% is very difficult if there is a low volume of 'low hanging fruit'.

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

Identifying and measuring wasted food without including inedible and unavoidable biowaste derived from food production, preparation and consumption. Otherwise food waste could be seen to be reduced by the exclusion of grass in brown bins or by the closing of food production factories, possibly resulting in the importation of pre-processed food products. These materials have to lie outside the scope of this initiative.

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

It is our view that the 'StopFoodWaste' campaign has been successful in creating public awareness of this issue.

Incentivised charging is also an important factor that makes people think about their waste, including their food waste.

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

The draft Roadmap states that *"A concerted approach across all stakeholders – Government Departments, organisations across the public sector, businesses, academia, food rescue organisations, households and individuals – will be crucial to help drive the delivery of Ireland's National Food Waste Prevention Roadmap"*.

Later in the document it states:

“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.”

These statements appear to fall short of the full list of relevant stakeholders. We suggest that the following groups are also stakeholders:

- Agri-food industry
- Restaurant and hotel sector
- Retailers
- Composters
- Biomethane producers
- Horticulture sector

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

We feel that it is too early to comment on this until the scope of the material to be included in the measure is finalised. The lack of movement from DECC in the last 18 months since the IWMA raised concern over the scope of this measure is deeply concerning to our members and gives little confidence that the measure will be focussed on the correct material, i.e. wasted food.

We also have concerns over inconsistencies in the interpretation of the waste characterisation report that was prepared by RPS in 2018 for the EPA. The data used for household food waste appears too high. We suggest that this matter could be addressed in a meeting between DECC, EPA and IWMA, as it is perhaps too technical for this short submission and will be influenced by the determination of the scope of food waste included in the target.

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

We ask that DECC gives serious consideration to our ‘Opening Comments’ presented earlier in this document, as a blunt instrument that tries to reduce biowaste by 50% will inevitably fail. It will also have long lasting negative environmental consequences for Ireland as it will impact negatively on investment in composting and AD plants, both of which provide significant environmental benefits for Ireland.

We hope that this submission is helpful and we look forward to further positive engagement with the DECC on this and other waste policy issues.

Yours Sincerely,

[Redacted signature block]

Appendix 1

IWMA Minutes of Meeting with EPA and
DCCAIE on Food Waste Reduction



IWMA Meeting with EPA and DCCAE On SDG 12.3 - Food Waste Reduction

– 9th September 2020

MINUTES

9TH SEPT 2020

10.00 HOURS

MS TEAMS VIDEO CONFERENCE

ATTENDEES	<ol style="list-style-type: none"> 1. Conor Walsh (IWMA Secretary) 2. Morgan Burke (Stream Bioenergy) 3. Bernie Kiely (DCCAE) 4. Alex Hurley (DCCAE) 5. Odile Le Bolloch (EPA) 6. Helen Searson (EPA) 7. Shane Colgan (EPA)
APOLOGIES	none
NOTE TAKER	Conor Walsh (CW)

ITEM	DISCUSSION	ACTION
1. Purpose of the Meeting	<p>Ireland has signed up to a number of UN Sustainable Development Goals including SDG 12.3, which states:</p> <p><i>“By 2030, halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses.”</i></p> <p>The responsibility for meeting this Goal lies primarily with the Department of Agriculture (DAFM) but is supported by DCCAE and has been integrated into the National Waste Prevention Programme, which is managed by the EPA.</p> <p>Achievement of this Goal is now included in the new Waste Action Plan, as follows:</p> <p><i>“We will continue to play a leading role at EU level, working with other Member States to agree targets and sectoral priorities that provide a pathway to achieving one of the goals of SDG12 in reducing food waste by 50% by 2030.”</i></p> <p>The IWMA requested this meeting as it is concerned about the current interpretation of this Goal and how it might impact on development of new infrastructure designed to manage food waste in an environmentally sound manner.</p>	
2. IWMA Position	<p>The IWMA explained that it became concerned about the interpretation of SDG 12.3 when it received feedback that the National Waste Prevention Committee considers that there is c. 1 million tonnes of food waste in Ireland and that needs to be reduced to 500,000 by 2030 to achieve the Goal.</p>	

	<p>The IWMA asked that a detailed analysis be carried out to determine what is actually wasted food and what is unavoidable food waste such as peelings, shells, bones, stalks, cores and other inedible parts of animals and vegetables. The IWMA contends that unavoidable food waste should not be included in the efforts to reduce food waste.</p> <p>The IWMA is also concerned that a lot of food waste in Ireland is mixed with grass and other garden waste. This must also be removed from the analysis, which should be limited to '<i>wasted food</i>' that is ultimately avoidable.</p> <p>With detailed analysis, the IWMA expects that the required reduction should be much less than the 500,000 t/a initially suggested.</p> <p>The unintended consequence of the suggested target of a reduction of 500,000 t/a in food waste quantities is that it will impact on investment in biological treatment plants, which are needed to manage food and garden waste in Ireland in an environmentally sound manner. This quantum will clearly not be achieved, so the bulk of the 1 million tonnes will still require environmentally sound management.</p> <p>Investors normally require a market assessment before investing in the development of composting and AD plants and CW has carried out many such assessments as a consultant with SLR, including assessments for investors in Huntstown Bioenergy and Little Island Bioenergy plants. Removing 500,000 t/a food waste from the 2030 market projection figures would be a red flag that would kill any such investments, leaving the sector short of capacity to biologically treat food and garden waste in future years.</p>	
<p>3. Response of DCCAIE & EPA</p>	<p>The plan to meet SDG 12.3 has not yet been formulated and will be developed by DAFM with support from DCCAIE and the EPA. The relevant authorities will take account of the IWMA position on this matter and the associated concerns.</p>	<p>EPA / DCCAIE</p>