



Ireland's National Food Waste Prevention Roadmap

A Response to the Department of the Environment, Climate and Communications from the Jesuit Centre for Faith and Justice

Introduction

The Jesuit Centre for Faith and Justice welcomes the opportunity to comment on the Ireland's National Food Waste Prevention Roadmap. We welcome the integrated and holistic vision within the document which highlights the interconnections between social, environmental and economic issues. Full implementation of this roadmap could progress our ambition to reducing our food waste by 50% by 2030.

In this submission we wish to highlight some areas which we feel were under represented in the roadmap as well as emphasize the connection between food waste and poverty. Any action taken to reduce food waste, in particular changes in prices, will need to be proofed for any social justice issues which may result.

Incorporating Social Justice Aspects of Food Waste

In Ireland the risk of food poverty rate was 8% in 2018¹. In the intervening years the cost of living has risen substantially which alongside the Covid 19 crisis has resulted in an observed increase in people seeking help to feed their families². The sharp increase in the price of inputs will lead to substantial increases in prices of food over the coming year³ further exasperating the issue. On the other hand, the CSO Household Budget Survey 2015-2016 showed a decline in the proportion of income spent on food since 1980 showing that on average we spend less of our income on food than previous generations. At the same time only 32 percent of the farm population represented by the Teagasc National Farm Survey in 2018 were classed as being economically viable with another 34 percent only being sustainable due to an off-farm income source. Below-cost selling of food is one of the

¹ <https://www.cso.ie/en/releasesandpublications/ep/p-sdg2/irelandsunsdgs2019-reportonindicatorstofgoal2zerohunger/hunger/>

² <https://www.irishtimes.com/news/social-affairs/survey-finds-increased-food-poverty-and-mental-health-difficulties-due-to-covid-19-1.4275999?mode=sample&auth-failed=1&pw-origin=https%3A%2F%2Fwww.irishtimes.com%2Fnews%2Fsocial-affairs%2Fsurvey-finds-increased-food-poverty-and-mental-health-difficulties-due-to-covid-19-1.4275999>

³ <https://www.irishtimes.com/news/consumer/groceries-set-to-cost-780-more-over-next-year-1.4783834>

practices which has been identified which force producers out of business⁴. Artificially depressing prices of food cannot be the only mechanism by which we enable those who earn below the national average to afford food.

Looking at all of this together food poverty is not necessarily only a result of the price of food but is a consequence of general poverty precipitated by increases in housing costs, fuel costs and social inequality. There are over 600,000 people living in poverty in Ireland⁵ where the choice between putting food on the table and paying the rent is not an abstract idea but a real possibility. In this light food waste is not only an environmental issue but also a social justice issue. Measures which look to ensure both food poverty and food waste is reduced must sit alongside policies which reduce inequality, such as affordable housing, childcare and health.

Reassessing our Primary Production System

The Food Waste Prevention Roadmap and A Waste Action Plan for a Circular Economy both highlight the significant in-puts and resources required to grow food, with the more intensive systems requiring relatively more in terms of fertilizers, pesticides and herbicides.

The Roadmap highlights the issues around lack of data in terms of loss of food during the primary production phase however this gap in the knowledge should not prevent action being taken now to improve sustainability within the primary production sector. The Irish agricultural sector is primarily a productivist model of food production – characterised by intensification, concentration, and specialisation⁶. We are heavily reliant on imported fertilizer and fodder with Ireland importing 3.4 million tonnes of grain and protein as animal feed 2018⁷, leaving us in a precarious position as the current war in Ukraine is highlighting. The ethics of using grain to produce cheap meat and dairy for export must be assessed in the context of food waste. Approx 66% of the grain calories fed to finishing cattle is lost by the animal simply living and breathing so only approx. 33% of the energy is transferred to the person eating the meat. This loss of energy, and the resources that went into producing this feed, should be acknowledged as part of our food waste roadmap. The food waste hierarchy identifies that food diverted to animal feed is third from the top with prevention and food diverted for human consumption the preferred options. While we are not suggesting that no grain should be used as fodder the sheer amount used to support our export driven model should be questioned. Regenerative agriculture practices, reducing the need for additional feed in the form of grain, should be supported to reduce the overall volume of grain that is destined for animal consumption rather than human consumption. This change in model may also require a shift in eating patterns as regenerative agriculture would not necessarily support the same volume on meat and dairy production.

Another aspect of our agricultural model that should be considered in terms of food waste is animal welfare. Here aspects of regenerative agriculture can also help. Sustainable food

⁴ <https://www.irishexaminer.com/farming/arid-40833398.html>

⁵ <https://www.socialjustice.ie/article/more-660000-people-poverty-2020-over-210000-are-children#:~:text=More%20than%20660%2C000%20people%20in%20poverty%20in%202020%2C%20over%20210%2C000%20are%20children,-Posted%20on%20Friday&text=661%2C518%20people%20in%20Ireland%20are,of%20which%20250%2C956%20are%20children.>

⁶ https://www.stopclimatechaos.ie/assets/files/pdf/ien_agricultural_food_policy_v2.pdf

⁷ <https://www.teagasc.ie/media/website/publications/2020/Crops-2030-Strategy.pdf>

production which leads to an overall increase in animal health⁸ and welfare can reduce food waste in the form of on farm production losses. A contentious area where animal welfare interconnects with food waste is the issue of bull calves from dairy farms. Our current agricultural system places very little value on bull calves which has led to them either being culled or exported live which can cause a high proportion of mortality⁹.

The unsustainable practices, leading to loss, extends from the land to the sea. The fishing sector has a particularly high impact where destructive fishing practices, particularly bottom trawling¹⁰, which result in extensive bycatch and over fishing is well documented¹¹. Ireland is one of the worst offenders for over-fishing¹². Currently Ireland has just over 2% of its water under protection¹³, with even those having very low levels of protection as ‘no legislation is currently used in Ireland to legally underpin protected areas established to fulfil commitments under international conventions’¹⁴. Implementing the recommendations of the report from the expert advisory group on marine protected areas (MPAs) entitled “Expanding Ireland’s Marine Protected Area Network”, which was open to public consultation until July 2021¹⁵, as well as banning some destructive fishing practices would help reduce waste from this sector.

Individual and Community based actions

The Food Waste Roadmap sets out, from the data we have, where most of the food waste originates from. Approximately 50% (497,448 tonnes) comes from the processing and manufacturing sectors, approx. 25% (254,745 tonnes) arises from households with retail/distribution resulting in just over 10% (111,297 tonnes) originating from retail / distribution.

Despite the fact that approx. a quarter of all food waste occurs in people’s homes measures to counter this issue were relatively vague in the Roadmap. Redistribution of food is a key aspect of reducing food waste. This draft roadmap is very strong in highlighting the importance of this at the food processing and retail level using the FoodCloud social enterprise which facilitates food which could go to waste to be redirected to food banks and charities. However, there is little mention of redistributing food from domestic or community settings. OLIO, which similar to FoodCould aims to reduce food waste, connects neighbours with each other and with local businesses so surplus food can be shared, not thrown away.¹⁶ Similarly, community fridges, which are dotted around the UK¹⁷ can also be utilized to minimize food waste coming from domestic and community settings. Supports will be needed

⁸ <https://vetsustain.org/work/regenerative-agriculture-practices-provide-benefits-for-ruminant-health>

⁹ <https://www.theguardian.com/environment/2020/jan/20/it-would-be-kinder-to-shoot-them-irelands-calves-set-for-live-export>

¹⁰ <https://www.irishexaminer.com/news/arid-40770036.html>

¹¹ [https://www.thejournal.ie/net-loss-pt1-ocean-impact-5401657-Apr2021/;](https://www.thejournal.ie/net-loss-pt1-ocean-impact-5401657-Apr2021/)

<https://www.globalcitizen.org/en/content/world-wastes-50-million-tons-of-fish-each-year/>

¹² <https://www.irishtimes.com/news/environment/ireland-among-worst-offenders-for-overfishing-says-new-report-1.3449450>

¹³ <https://mpatlas.org/countries/IRL/>

¹⁴ <https://www.npws.ie/marine/marine-habitats>

¹⁵ <https://www.gov.ie/en/consultation/45271-public-consultation-on-expert-advisory-group-report-entitled-expanding-irelands-marine-protected-area-network/>

¹⁶ <https://olioex.com/>

¹⁷ <https://www.hubbub.org.uk/the-community-fridge>

to communicate these ideas with citizens as well as to set up and run these projects which can result in excess food being distributed locally within communities.

Segregating food waste and diverting it from landfill was also extensively covered within the Roadmap. All of the measures proposed rely on bin collection services and ensuring these are available to everyone no matter where they live in the country or in what type of housing.

This is a vital part of the solution as currently this service is not available to large proportions of the population who live in apartments or in rural areas. Brown bin collections however should not be the only way in which we manage our food waste. Supporting and incentivizing community composting, for example in apartment blocks or in schools, would be an important measure. Indeed such a project “Composting for Schools”¹⁸ was launched in Dublin last year. The role of small scale anaerobic digestion in treating domestic, and the service industry food waste also needs to be examined.

The role of diverse routes to market for farmers, which can be beneficial for consumers in terms of food management for end consumers, also needs to be examined and supported. The different ways in which consumers purchase their food can influence the amount of food waste they produce and how they interact with their food¹⁹. The social infrastructure of the Community Supported Agriculture (CSA) promoted and facilitated more sustainable consumption practices which focused on local and seasonal foods, CSA members also tended to adjust their consumption and food preparation to make full use of their produce and avoid food waste. Diversification of pathways for products to reach consumers including developing local food processing infrastructure can also be beneficial for the producer as it can allow the producer to earn more from their produce than when passing through a retailer²⁰.

Integrated and holistic policy development

Food waste is a major issue which is ingrained in our society. Solutions to this problem, across the entire supply chain, will need to be fair, well integrated with other policies, ambitious and well communicated with the public. Failure in any of these will result in policies that fail to reduce our food waste or ones that have a disproportionate impact on the most marginalised in our society.

¹⁸ <https://www.fingal.ie/news/composting-schools-project-kick-month>

¹⁹

<https://www.ucc.ie/en/media/research/environmentalresearchinstitute/eriprojectstwo/SummaryReport-Dynamicsbetweenacquisitionandconsumption.pdf>

²⁰ <https://www.arc2020.eu/farm-2-fork-a-truly-green-farming-food-and-rural-vision-for-ireland/>