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OLIO's response to the public consultation on Ireland's National Food Waste Prevention draft Roadmap

Background context on OLIO

OLIO (www.olioex.com) is the world's #1 free sharing app, created in 2015 to tackle the enormous problem of food waste around the world. We achieve this by connecting neighbours with each other, and volunteers with local food businesses, so that surplus food can be redistributed and not thrown away. This could be food nearing its use-by date in local stores, spare home-grown vegetables, or surplus groceries in the fridge before a holiday. OLIO has over 5.7 million users who have collectively shared over 46 million portions of food worldwide. Half of all food added to the app is requested within 21 minutes of posting.

Our B2B programme, the *Food Waste Heroes Programme*, enables food businesses (supermarkets, contract caterers, corporate canteens, quick service restaurants, etc.) to have zero food waste locations. This is thanks to our team of 46,000+ trained volunteers who collect surplus food from 3,200+ locations, take it home and redistribute it to the local community via the OLIO app, all underpinned by our world-first technology and food safety management system. Our clients include Tesco, Pret a Manger, Booker, Compass Catering and many more. We're most active in the UK and Ireland, and expanding as we speak to Singapore and Mexico.

Summary of OLIO's view on Ireland's National Food Waste Prevention Roadmap

OLIO strongly supports Ireland's National Food Waste Prevention Roadmap. However, it seems that the draft Roadmap focuses solely on the redistribution of surplus food to charities, who often lack the necessary capacity, resources or infrastructure to successfully redistribute all surplus food. We believe that the draft Roadmap therefore misses an enormous opportunity to support community redistribution businesses and other for-profit food recovery organisations who play an essential role in the food waste hierarchy, thereby enabling Ireland to get closer to its objective of halving food waste.

Responses to 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?

With regards to surplus food redistribution, we believe that the draft Roadmap is not sufficiently far-reaching to reduce Ireland's food waste by 50% by 2030. This is because Section 10 of the draft Roadmap only mentions charities as the recipients of surplus food donations. Charities already struggle to handle the current volume of surplus food (please refer to the answer to question 4 below), let alone the huge amount of additional surplus food that could result from any regulatory changes, as has been the case in France and California.

We believe that the draft Roadmap should therefore acknowledge the role of food recovery organisations, both charitable and for-profit, in order to give Ireland a fighting chance of reaching its targets. Private businesses like OLIO are relatively new joiners in the food redistribution sector however, as explained in more detail in our answer to question 4, already play a key role in complementing the work of charities without competing with them and playing a critical role in enabling food waste reduction targets to be met.

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

Lifting administrative barriers to food redistribution

OLIO's volunteers (Food Waste Heroes) located in Ireland currently have to register as a food business with the FSAI. This administrative burden is a serious deterrent for individuals who want to volunteer for our Food Waste Heroes programme.

In the UK, our Food Waste Heroes do not have to register as food businesses. This is due to our Primary Authority (South Derbyshire) giving us Assured Advice on our HACCP and the training materials that our volunteers have to go through in lieu of registering as a food business. Indeed, our platform enables users and volunteers to easily and quickly contact us in case of food safety concerns. Our technology also allows us to know exactly which product was picked up by which user, making product recalls fast and efficient.

We therefore believe that Ireland should empower individuals to get involved in the fight against food waste by lifting the requirement to register as a food business with the FSAI if they want to collect and redistribute food in a regular and organised fashion.

Introducing a broad and far-reaching Good Samaritan law

Good Samaritan laws protecting food donors from civil and criminal liability against donees (where food safety regulations have been met) have been successfully implemented in countries like Italy, Argentina and the United States. These laws have been proven to be efficient incentives for businesses to donate their surplus food with greater peace of mind and therefore in greater quantity.

Ireland has the opportunity to not only introduce a Good Samaritan law, but to go further than other countries by protecting not only food business donors but food recovery organisations as well (charities and businesses alike).

By protecting key participants in the broader food redistribution space, Ireland can encourage more organisations to participate in food redistribution and increase the chance of donating businesses finding a food redistributor that meets their specific needs, without compromising the need for robust food safety management systems and processes.

Tax incentives for businesses who donate their food surplus

Tax incentives could include:

- VAT deductions of donated products that are not zero-rated
- Tax deductions or credits to help offset the costs of donations (e.g. the cost of food collections, expenses involved in training supermarket staff, transport, etc.), like transport costs in California

- Tax deductions or credits for the cost of goods donated or for a portion of their retail value to incentivise businesses to donate instead of sending surplus food to compost or landfill¹

Replicating incentives that have proven successful in France

The introduction of measures similar to the French *Loi relative à la lutte contre le gaspillage alimentaire* could be tremendously beneficial, such as:

- Making it compulsory for supermarkets and mass catering businesses to establish a partnership with a food recovery organisation to donate unsold food products
- Forbidding the destruction of unsold food products still fit for consumption, with heavy fines for non-compliance
- Making it compulsory to offer a ‘doggy-bag’ option for commercial catering
- Banning the sale of overly-prepared products such as ready-sliced fruit and peeled vegetables which have a very short shelf-life and therefore create more waste

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

We believe that the most transformative measure would be educating the public (adults and children alike) about food waste in general - with an emphasis on the distinction between use-by dates and best-before dates. The confusion between these two dates is responsible for a large portion of edible food waste: as much as 15% in the UK². Such education campaigns should take place at all possible levels starting in schools where children can start by learning basic preserving and food storage techniques.

An even more effective measure to eliminate the confusion between use-by and best-before dates would be to get rid of best-before dates altogether, thus leaving no room for confusion and nudging consumers towards making their own decision before eating or discarding low-risk food items.

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

OLIO believes that food redistribution organisations, which have currently been excluded from the draft Roadmap, would be a crucial addition to a successfully implemented Roadmap.

It is a well-known fact that there is far more surplus food available in all sectors of the food industry than charities can possibly collect and redistribute. In the UK, the top-end estimate of edible surplus food along the supply chain, including pre-farm gate and post-farm gate but not including household food waste, is 2 million tonnes³. In 2020, WRAP calculated that charities were able to collect nearly 64 thousand tonnes of surplus food, or 3.2% of the available total. Using a more conservative figure excluding pre-farm gate and household waste, “the total amount of food surplus that might be suitable for redistribution in the UK could amount to between 175,000 to 200,000 tonnes”⁴. In other words this means that, even in the most optimistic scenario, charities are only able to collect one-third of the surplus food that is most easily accessible.

¹ [In France and Spain, 60 % and 35 % respectively of the net book value of donated food can be claimed as a corporate tax credit. This percentage can be deducted from the corporate tax on their revenue.](#)

² [Use by, sell by, best before: Why confusing labelling is causing food waste, and how to stop it. The Independent. 22 March 2021](#)

³ [Policy Brief, Food on Plates, FareShare, page 2](#)

⁴ [Surplus food redistribution in the UK 2015 - 2020. Final report, WRAP, page 24](#)

OLIO believes that more can be done to enable the remaining two-thirds to end up on a plate rather than in compost, biodigestion or landfill. While the above statistics likely differ slightly between the UK and Ireland, the conclusion is the same: if signatories of UN Sustainable Development Goal 12.3 want to reach the ambitious target of reducing food waste by 50% by 2030, charities alone are part of the, but not the entire, solution. Unlike charities, private food recovery organisations have the capacity, resources and infrastructure to facilitate efficient redistribution in sectors where no solutions existed until recently, like fast-food restaurants.

Furthermore, food recovery businesses also play a major role in the redistribution of the many types of food that most charities typically cannot collect at all: hot food, chilled food, frozen food, food nearing its use-by date, food after its best-before date or food that some charities do not want to collect any more of (e.g. bread and sandwiches). These categories of usually high-risk food or food with a very short shelf-life represent huge volumes of surplus that can only be shifted in a matter of hours before becoming unfit for human consumption. In Ireland for instance, charities are usually unable to collect hot food from fast-food restaurants and takeaways because they do not have the capacity to redistribute it quickly enough to ensure that the food is safe to eat. By way of comparison, hot food collected by OLIO's volunteers from a fast-food restaurant can be easily redistributed to consumers, via the OLIO app, well within the 2-hour window during which high-risk hot food is safe to eat.

This opens up a whole new range of virtually untapped sources of surplus food, that until recently was impossible to redistribute but can now be saved from landfill. Charities should of course always take priority over for-profit food recovery organisations, and OLIO has been working hand in hand with charities like FoodCloud in Ireland and FareShare in the UK since Day 1 to make sure that charities have priority when new food collection slots become available in businesses within their reach⁵.

Finally, food recovery organisations, like OLIO, are addressing a fast-growing audience happy to eat surplus food that would typically not visit food banks: eco-conscious neighbours who hate seeing good food go to waste. This is where the real power of community redistribution is, and this is why those high-risk or short-life items end up on a plate rather than a bin. At a hyperlocal scale, everyone has a neighbour who would happily come and pick-up surplus food, even late in the evening, instead of seeing it go to waste. This represents millions of people who would never visit a food bank and take food away from people in need, who want to do their share for the planet by picking up surplus food from their neighbours. Charities do not reach this huge audience at all.

This is why we believe that, in Section 10, the Food Waste Prevention Roadmap should include food recovery organisations in addition to charities, giving innovative organisations a better chance to unlock the full potential of community and technology in the fight against food waste.

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

We are satisfied to read that the draft Roadmap captures the crucial sector of primary production and are strongly supportive of the inclusion of the farm sector in future food waste reporting requirements. By doing so, Ireland would be a leader in food waste transparency whilst helping the farm sector make the case for policy changes to get a higher proportion of its food to market.

We are also satisfied that the draft Roadmap captures the importance of household waste as a big part of both the problem and also the solution. Indeed, households are responsible for a quarter of all food waste in Ireland and everything should be done to bring this number down. Ireland has the

⁵ As explained by Tesco on their [website](#): "We have also sent 1,537 tonnes of food to Olio, our new partner that allows us to give food from stores that don't have a charity partner, to the community."

unique opportunity to play a pioneering role in the fight against food waste by including households in its package of measures; educational or otherwise.

However, we believe that the draft Roadmap does not provide enough detail on the size of the businesses that will have to measure and report their food waste. We cannot recommend highly enough that medium-sized businesses should be included in these requirements, alongside large ones, and that financial support should be provided to smaller businesses to help them overcome the complexities of measuring food waste.

Finally, we think that food waste measurements and reporting should distinguish between actual food waste that is not suitable for human consumption and edible food surplus that can be safely redistributed and benefit the community instead of wasting its full potential as animal feed.

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

We have no further comments or feedback but would welcome the opportunity to engage in a deeper dialogue - particularly with regards to the redistribution section of the Roadmap.