



Draft National Food Waste Prevention Roadmap

Public Consultation

March 2022

Questions 2 and 3

“What additional actions do you think would be effective in helping Ireland reduce its food waste?” and “What are the most effective awareness raising measures that could be taken to reduce food waste?” Education must be at the forefront of this process and must be approached early on as a preventative rather than reactive measure.

Education

As per the Food Waste Hierarchy the most preferable is prevention. Whilst it is acknowledged that the Restaurant and Food Services Sector contributes to food waste and is taking active steps to address this, education is paramount for not just the industry that prepares, serves and sells food but for all consumers of food, and all citizens are consumers of food. The Restaurants Association of Ireland has been calling for comprehensive Food Education to be included in the Primary Level Curriculum. Food waste prevention would be an integral element of such a syllabus.

Q4. Which sectors or stakeholders do you think should play a key role in the implementation of the Roadmap?

It is vital that the Food Safety Authority of Ireland (FSAI) plays a role in the implementation of the road map. The FSAI has oversight of food safety legislation in Ireland and the register and inspection of food serving and selling businesses in Ireland through the Environmental Health Officers (EHOs). There is already significant legislation and inspections in place with the food sector so the role of reviewing businesses for food waste measurement should be become a part of the existing inspection process.

The FSAI also currently very effectively delivers education, training and awareness alongside Safe Food to businesses and should be tasked and funded to also communicate to businesses regarding food prevention, segregation and provide training and support



Regarding food donation there are currently exceptional third-party commercial entities operating in this space by signing up food businesses from wholesale to restaurants and retail to donate or indeed sell off food to prevent waste, including Food Cloud and Food to Go. Supports should be offered to these businesses and indeed the food businesses that sign up with them to put food waste prevention at the forefront. To achieve this a review must take place of existing food safety legislation which is very restrictive in its current form and prohibitive in some instances for businesses wishing to engage in such food waste prevention measures and initiatives either themselves or through a third-party business. A working group, involving the FSAI will be needed to establish if donations and can be given separate consideration under current food safety legislation or perhaps specific and new food safety legislation may be required.

Whilst the FSAI has made general guidance available regarding donations it is brief guidance and does provide for potential negative consequences for businesses donating from a litigation perspective, stating: “The process of food donation must also be considered within the food safety management system of the donating food business. All food businesses whether donating or receiving and handling donated food must also make themselves aware of their legal responsibilities under food legislation.”¹

Q5. Are you satisfied with the proposed Roadmap monitoring and evaluation arrangements?

Section 16 which mentions the establishment of a Food Waste Prevention Task Force is welcome as is the indication that it will include representatives from key sectors and organisations. The Restaurants Association of Ireland (RAI) would ask to be included or given the opportunity to nominate a representative for the task force as the RAI is a membership organisation with 2,500 members consisting of Restaurants, Hotels, Gastro Pubs, Coffee Shops, cookery schools, caterers, and industry suppliers. It is welcome that the Roadmap will be informed and updated based on the Taskforces recommendations. Industry at the coal face should be included at every step of this process so that operators can be part of the process and industry involvement in development of the Roadmap will ensure greater engagement.

¹ https://www.fsai.ie/food_businesses/donations/business.html



We acknowledge that the last forum on Food Waste took place in 2019 and this was the third since its inception. There is exceptional best in practice operators within the wider food service and restaurant industry who should be included in the next forum. Industry should be engaged to speak to others within industry about simple and small effective changes towards food waste reduction and wider sustainability challenges that have worked in food businesses already.

The extension of the Food Waste Charter in place currently for retail to wider food service businesses is welcome and again the Restaurants Association of Ireland strongly recommend the inclusion of industry representatives during the development stages and implementation.