

Draft National Food Waste Prevention Roadmap

Retail Ireland submission

March 2022

Introduction

Retail Ireland welcomes the development of a National Food Waste Prevention Roadmap and broadly agrees with the outlined approach in the draft Roadmap to reduce Ireland's food waste by 50% by 2030. The draft Roadmap re-affirms the Government's commitment to UN Sustainable Development Goal 12.3 to reduce food waste by 50% by 2030. We also welcome the Farm to Fork approach to the roadmap in line with the European Green Deal.

Many retailers in Ireland already have actions in place to reduce food waste. For example, some retailers redistribute surplus food and drinks nearing the end of their shelf-life working with FoodCloud, a social enterprise that connects businesses with surplus food to charities. Strict standards must be met for donations to ensure the highest levels of food safety and some companies give financial and other supports to FoodCloud in addition to donations. While such initiatives are important, industry recognises the need to do more to reduce waste and contribute further to the country's ambitious sustainability objectives.

Some key points raised from the retail sector:

- Given the complexities of detailed food waste reporting, it would be beneficial to adopt an
 existing, respected framework that companies may already be familiar with through their UK
 or other operations. This would also benefit companies operating on an all-island basis,
 reduce costs and make it easier to compare data.
- Primary production, manufacturing and processing, retail and distribution, restaurants and
 food services, and households all key to the success of reducing food waste. It is crucial that
 this is fully reflected in roadmap. While retail has very important role to play, it is crucial that
 the approach incorporates all aspects of the food supply chain.
- Measurement and reduction of food waste in primary production is important. Primary producers will need to be supported in this.

- Animal feed could provide another avenue for food waste. This is currently the case in other European countries. Suitable bakery or fruit/veg items could potentially be redirected in this manner.
- The scope to donate currently non-donatable foods (i.e. pre-packaged sandwiches and fresh foods to go) would help retailers reduce their surplus this could be an option if the items are to be consumed immediately.
- Consumer awareness will be a key priority to aid in the delivery of the Roadmap. The
 Government and the EPA also have a key role to play to ensure that consumers are educated
 on how to prevent food waste. The Government must also ensure there are supports for all
 sectors of the supply chain to implement food waste prevention initiatives, be that through
 training programmes, school initiatives or innovation and research.
- Any future policy developments, including around packaging, need to consider existing legal
 and regulatory requirements, including the Single Use Plastics Directive, for example. It is
 important that the retail sector is fully consulted with in relation to any proposed changes in
 this regard. The sector can provide practical experience and important perspectives.
- Retail Ireland supports a shared approach to food waste set out in the Roadmap by all actors
 at each stage of the food chain. This could include commitments to sustainable practices and
 a joint exploration of facilities/partnerships to redistribute food waste. This approach would
 recognise better use of by-products of food production systems so that they can be inputs
 into other processes rather than waste.
- The concept of 'prohibition' of food destruction prior to use by date could be problematic in certain circumstances, and mandatory donations could also be an issue as currently there are not enough charitable organisations to manage this. It is crucial that these issues are examined in detail before any proposals are brought forward.
- It is important to incentivise food waste reduction targets to encourage greater adherence to and adoption of the food waste hierarchy.
- Retail Ireland welcomes the fact that the Food Waste Prevention Task Force will identify and maintain a register of priority research topics on food waste. The process of successfully identifying what are the priority areas is key.

Retail Ireland is happy to follow up if there are any queries relating to the positions outlined in this submission.