

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

Submission by RGDATA on the Draft National Food Waste Prevention Roadmap

Dear Sirs,

RGDATA, as the representative body for the independent retail grocery sector in Ireland is pleased to make a submission on the draft National Food Waste Prevention Roadmap.

RGDATA members own and operate over 3,500 community based food retailers throughout Ireland. Our members make an important social and economic contribution to their local communities. RGDATA members operate in a fiercely competitive sector with very tight margins and a constant focus on controlling costs and overheads. As a sector that is labour intensive with over 100,000 people employed across our members' shops, any additional cost imposition has a direct impact on the viability of our members as there is very limited capacity to recover these costs through imposing retail price increases.

Compliance costs - The sector already bears significant compliance costs on enforcing national policy in a range of different areas, not least environmental policy. For instance the sector administers the plastic bag levy, maintains membership of packaging compliance schemes, and will shortly start to administer the Deposit Return Scheme. Administering all of these schemes and initiatives involves retailers incurring increased costs which directly impact on viability and the commercial sustainability of their businesses. Retailers do not represent some infinite source for applying and absorbing regulatory compliance obligations – compliance imposes a cost and this needs to be factored into the design and configuration of national initiatives. Independent retailers are extremely supportive of sustainability measures but they must be engineered to be at a minimal cost or cost neutral to the business wherever possible.

Business sense - RGDATA members do of course support the reduction and prevention of food waste in the supply chain. Reducing food waste makes business sense and RGDATA has worked with the Retail Sector Action Group on preventing food waste in the supply chain. However, it is important not to treat the retail food sector as a single entity and to differentiate the roles and operations of different players. For instance a local community based retailer in rural Ireland has an entirely different operating model to a large branch of a multinational retailer operating in Dublin. It is vital that the Food waste prevention programme takes into account the size and different formats operating in the sector and does not impose an unnecessary burdensome regulatory system on independent local shops.



Complex retail landscape - In terms of minimising food waste, retailers work hard to ensure that product is not wasted and is sold before the best before date. Generally, RGDATA members have less scope for sale or return arrangements with suppliers so it is important that they buy stock correctly and ensure that they are not left with stock that has not sold and is passed its best before date. Arrangements in the NFWPR need to recognise the differences in operation between different types of retail outlets and owners.

Competing policy objectives - It is also important to recognise the balance between competing national policy objectives on reducing packaging, while also reducing food waste and increasing food safety. The obligation largely rests with suppliers of food stuffs to ensure that there is an appropriate balance struck between the need to ensure that products have a viable shelf life, while keeping the required packaging to a minimum. There can also be competing objectives between providing consumers with choice and value, while also minimising the potential for food waste – for instance multi buy offers can present consumers with a way to significantly reduce their shopping bill on specific lines. Banning multi- buy offers could lead to increased consumer costs which are an outcome that needs to be factored into the planning of any new proposals as to proportionality.

Mandatory donations - RGDATA would not favour any new mandatory donation of edible food from retail outlets – imposing such an obligation on a universal basis across retail grocery outlets in Ireland would create an excessive and disproportionate burden on retailers in parts of Ireland without networks to dispose of excess product. Ironically it might also lead to less care and control being exercised over ordering practices across retailers, if there is an awareness that excess product will be donated as a mandatory requirement. RGDATA would favour the retention of the existing regulatory approach concerning donating excess food, which leaves it to each retailer to address. Some find that stock can be moved on by discounting the price as the best before date approaches and all retailers will want to avoid dumping food stuffs in terms of reducing pay by weight charges.

Obligatory ban on destruction of edible food in advance of its use by date – allied to the issue of mandatory donations is the question posed in the consultation paper of a possible mandatory ban on the destruction of edible food in advance of its “use by” date. RGDATA is not aware of a significant problem with food being destroyed by retailers before its use by date. If such a measure was to have effect, it would need to apply to the destruction of food at the point where most food waste arises – in consumers’ homes. However, this would not seem to be an enforceable or viable option.

Supply chain - RGDATA would also favour strong engagement with food suppliers to examine ways in which the balance between food preservation and packaging reduction can be managed to ensure that waste is contained on both packaging and food.

In many instances retailers have limited options other than to accept product to the specification laid down by suppliers – particularly larger suppliers and brand holders. Imposing an obligation on suppliers in this regard to minimise waste streams being put on the market would be the most effective route to control.



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