



Food Waste Reduction Roadmap Comments

VOICE of Irish Concern for the Environment

VOICE is an environmental charity working extensively on waste prevention and the circular economy for nearly 25 years. From introducing the concept of a plastic bag levy in 2001 to the present, we have been one of the foremost environmental organisations pushing for behaviour change in how we manage and reduce our waste, from local action to strong government policy. We have advocated for innovative action to reduce food waste, starting with our Feeding the 5,000 event in 2012, where we feed nearly 5,000 people with surplus food that would have been rejected by supermarkets. We have run Food Waste Reduction challenges and Food Rescue events over the years and engaged with individuals and communities to identify ways to reduce their food waste. We respectfully submit our observations on the Department's consultation on the development of Ireland's Food Waste Reduction Roadmap.

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?

Response:

We fear that this approach is too vague and relies on the good will of the food industry to reduce food waste. The roadmap proposal states that producers and food businesses should 'commit' to raise awareness and share knowledge and that householders should follow guidance and tips and also 'commit' to raise awareness and share knowledge. It also says that all sectors 'should' monitor food waste and report. This is very woolly language and seems to follow the Courtauld Commitment¹ voluntary agreement model that is currently used in the UK to reduce food waste. The first Courtauld Commitment was established in 2005 and has slowly increased its food business signatories. However, over 10 years, they were only able to reduce manufacturing and retail food waste by 3% and household food waste actually increased.² It begs the question whether the food waste was actually prevented on the commercial end or was it just pushed along the supply chain onto the householders through different selling practices by the industry. Ireland has 8 years to reduce its food waste by 50% and we cannot rely on voluntary measures to reduce food waste.

¹ [Courtauld Commitment 3 supply chain targets on track for ... \(environmental-expert.com\)](https://www.environmental-expert.com/news/courtauld-commitment-3-supply-chain-targets-on-track-for-2020)

² [Courtauld Commitment Shows Milestones and Failures in Food Waste Fight \(foodingredientsfirst.com\)](https://www.foodingredientsfirst.com/news/courtauld-commitment-shows-milestones-and-failures-in-food-waste-fight)

In 2017, Environmental Minister Denis Naughten launched the Food Waste Charter³ at the Food Waste Forum, which was signed by 5 major food retailers that represent 70% of the grocery market. These 5 retailers have committed to track their food waste and report such data to the EPA. Unfortunately, there is no transparency and we don't know how effective this Charter has been and whether there has been any corresponding reduction in the generation of food waste.

Collecting data from all sectors of the food supply chain, from farm to fork is welcome and must be mandatory for all businesses above a certain size to collect the information and to create the baseline measurement. While we would not like to see any extra costs imposed on food businesses involved at any stage of food production or food service, we do believe food waste monitoring must be done in a way that is cost neutral to businesses. Food waste reduction must be part of the KPIs for all businesses and reported to the government. Environmental Health Officers (EHOs) are in each county, assessing food safety in all food establishments and they have access for all food businesses. We recommend that food waste reporting, prevention and segregated collection should be treated similarly to health and safety requirements and be inspected and enforced by the EHOs. We agree that Ireland should go beyond what the EU's 50% reduction target requires and to apply this reduction target to the primary producers as well.

Additionally, there needs to be a carrot and stick approach through policy. In 2016, France passed a law that mandated that all food unsold in retail stores over 400 sq. metres must donate their food to charities.⁴ We call for similar legislation here and we would welcome clarity on the issue of liability relief for food donation (as is done in the US under the Emerson Good Samaritan Food Donation Act). We also recommend exploring tax breaks for verifiable and quantifiable still-edible food donations.

Recommendations:

1. Food waste tracking and reporting must be mandatory for all food businesses above a certain size.
2. More transparency on the food waste reporting, according to sector.
3. EHOs to inspect food waste data, prevention initiatives and separate collection, similar to the enforcement of HACCP food safety requirements
4. Adoption of legislation requiring the donation of unsold food, limiting liability for surplus food donations and exploring tax breaks for food donations.

³ [THE CHARTER - Food Waste Charter](#)

⁴ [zwe_11_2020_factsheet_france_en.pdf \(zerowasteurope.eu\)](#)

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

Response:

Investment of time and resources in ongoing interventions.

There has been much study and past work done in this area, including research done by Clean Technologies Cork (CTC) and their EPA funded research on reducing commercial food waste⁵. They found that two-thirds of food waste is avoidable at the commercial level, so there should be interventions there to help Ireland meet its 50% reduction goal. Authors state that in order to effect long-standing change, there cannot be a quick in and out information campaign or intervention. Interventions must be take place over a period of time and companies attempting to reduce their food waste need funding and technical support. “The “fly-in-fly-out” nature of the assessments, the fine level of detail gathered (food was segregated into at least 16 categories) and the limited engagement with staff ahead of time are contrary to the approach needed for lasting, business-led changes. Such an approach should strive towards a continual improvement model that includes a combination of ongoing measurement, staff involvement and customer communication.” (emphasis added)⁶

Additionally, there have been many innovative approaches to reduce food waste, including the Stop Food Waste Challenges, the Olio and Too Good To Go apps to sell surplus food and of course FoodCloud, both through its app and through the three surplus redistribution hubs. These measures and future initiatives also play a part to reduce food waste and should – if appropriate in the interests of the public good, and in the absence of a developed market - receive financial support and resources.

As mentioned in the consultation document, Green Public Procurement has a huge role to play to reduce food waste within government buildings, catering contractors, schools and hospitals. Again, reporting on food waste generation must be mandatory as our public sector must lead by example.

Recommendations:

1. Continued and long-term interventions with food service businesses to embed food waste reduction behaviours.
2. Investment of money and resources in innovative actions to reduce food waste.
3. Embed food waste reduction priorities within Green Public Procurement.

⁵ [Research Report 282.pdf \(epa.ie\)](#)

⁶ Ibid. page 15

Eliminate Certain Sales Practices and other Supermarket practices that increase food waste

We believe that much of the household food waste is attributable to food shops and supermarkets' practice of pre-packing large quantities of fruit/veg/bakery stuffs for low prices, so shoppers buy more produce (and plastic packaging!) than they need. Additionally, the Super 5 and buy one get one free type offers encourage over-buying, which is good for the shop/supermarket, but bad for the generation of household food waste. The perception of a good deal with cheap food undervalues food waste and individuals don't equate food waste with the environmental, societal and economic costs. These types of practices should be eliminated or altered. In 2009, Tesco adopted a 'buy one get one later' campaign in the UK which allowed shoppers the ability to buy another of the same product the next time they shopped.⁷

Supermarkets are also known to cancel contracts with their producer, which causes crops to be ploughed back into the soil.⁸ Sharp practices such as last minute cancellation of contracts for the purchase of perishable fruit and vegetables must be discouraged.

Recommendations:

1. Investigate current business practices that increase food waste on other stakeholders along the food supply chain and ban such practices.

Further Granularity in Data Collection

Waste companies currently submit their waste collection data to the National Waste Collection Permit Office (NWCPO) according to waste stream. The amount of food waste collected is tracked and reported, but there is no granularity of the data. The CTC report recommends that waste companies report the amount of food waste collected on a sectoral basis (e.g. reporting according to NACE).⁹ This will make it easier to extrapolate the effectiveness of interventions within various food business sectors.

Recommendations:

1. Require more granularity in data collection to determine where food waste is generated according to NACE sectoral basis.

Walk the Supply Chain

As mentioned in the consultation document, we need a sectoral approach, involving all food supply sectors in food waste reduction. Additionally, we believe that all sectors must work together to understand the possibilities and barriers for food waste prevention at each stage of the food supply chain, from farm to fork. UK's WRAP programme has developed its

⁷ [Supermarkets – Say No To Food Waste](#)

⁸ Ibid.

⁹ [Research Report 282.pdf \(epa.ie\)](#) page 16

Food Waste Reduction Roadmap, whole chain food waste reduction plan toolkit, which outlines how to pull together the stakeholders to ‘walk the chain’. They state that “businesses need to **work together** to address the fundamental drivers of food waste and to create innovative opportunities for its reduction....[through] ‘whole chain food waste reduction plans (WCP)’”¹⁰ Their aim “**is to reduce total food waste**. WCPs should not simply shift food waste from one part of the chain to another...That’s why partners and KPIs across the full chain are needed.”¹¹ Stakeholders from each sector work together to identify ‘food waste hotspots’ along the food supply chain and then they identify opportunities. “This creates transparency, enabling businesses to take more end-to-end responsibility, and provides an external perspective on their own operations which can result in new ideas for improvements.”¹² In summary, we don’t want one sector passing its food waste along the supply chain and then announcing that they have made great strides in reducing their own food waste. The roadmap must ensure a collaborative and holistic approach to reduce overall food waste, from farm to fork.

Research and interventions in the healthcare industry through Green Healthcare can be a good guide to reduce food waste in that and other sectors. Origin Green could also be used to a better effect to encourage food businesses to reduce their food waste through measuring, reporting and implementing actions.

Recommendations:

1. The roadmap must ensure a collaborative and holistic approach to reduce overall food waste, from farm to fork by ‘walking the chain’ with all stakeholders to identify food waste ‘hot spots’.
2. Engage Origin Green to a better effect to encourage food businesses to reduce their food waste through measuring, reporting and implementing actions.

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

Response:

Education and outreach on reducing food waste must be done all along the food supply chain and there must be a consistent message, linking with environmental, societal as well as economic concerns. Efforts should be made to eliminate ‘best before’ dates on most food as many households throw away perfectly good food because of confusion around the date’s importance. According to EPA’s Food Waste Attitudes survey, 68% of people throw

¹⁰ [WCP-toolkit-full-guidance.pdf \(wrap.org.uk\)](#)

¹¹ Ibid. page 3

¹² Ibid. page 3

away food because of the 'use by date' and 55% throw away food because of the 'best before date'.¹³

In addition to government messaging through Stopfoodwaste.ie and other digital/traditional advertisements for households, other stakeholders must be active in raising awareness through different pathways. This can be done in supermarkets at each food section with nudges and hacks that people can use to reduce their food waste at home. Additionally, to reduce food waste in the food service industry, emphasis must be made to reduce plate waste through nudges, offerings of half portions, food substitutions and the encouragement of doggy bags to encourage customers to bring their leftovers home. This is not the custom in Ireland, but is the norm in other countries. Reducing plate waste would help hugely in reducing food waste. "On average, across food service, plate waste is the largest contributor, at 38% of total food waste, followed by preparation waste (34%) and unserved food waste (26%)."¹⁴

Development of Educational Training all along the food chain

As the submission document suggests, training manuals and educational materials must be developed and run in home ec classes, catering and food science 3rd level courses and PLCs, in restaurants for chefs and other food prep individuals. It is not enough to develop the training tool kits, but they must be facilitated and embraced by those producing food.

Recommendations:

1. Elimination of the 'best before dates'.
2. Engagement of all stakeholders in offering nudges and food waste prevention hacks where people buy their food.
3. Development and running of educational training all along the food chain.

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

Response:

Such stakeholders include, but are not limited to, primary producers, manufacturers, logistics companies, food service companies (catering/restaurants and food shops/supermarkets), hospitals and other large institutions, consumers (and consumer agencies), FoodCloud and other charitable organisations and Non-government organisations (those in the environmental, social justice and anti-poverty arenas). Researchers, such as CTC, also play a huge part to understand consumer behaviours and who can collect and

¹³ https://www.epa.ie/media/epa-2020/monitoring-amp-assessment/circular-economy/National_Food_Waste_Attitudes_Survey.pdf

¹⁴ [Research Report 282.pdf \(epa.ie\)](#) page 14

track the data. Of course government departments and politicians have a central role to play to establish targets and effective policy to reduce food waste. We have a huge road ahead to reduce food waste and only 8 years to reduce it by half.

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

Response:

Monitoring and evaluation is only useful if food waste reporting is mandatory for all food businesses.

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

Response:

This plan needs more meat on the bones with key deliverables and enforceable interim targets. Food waste reduction, as the document states, must be done by all stakeholders in the food sector as well as in the home.

Further inspection must be carried out on a production and retail level to identify current business practices that push food waste to other sectors along the food supply chain, whether it impacts the primary producer or the household. We urge the 'walk the chain' approach to ensure all sectors work together to identify solutions to reduce food waste.

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