

CONSULTATION RESPONSE TO EUROPEAN COMMISSION ON EU FOOD WASTE METHODOLOGY

Feedback welcomes and commends the Commission's draft document "Monitoring of food waste – outline to methodology", as a robust beginning to the process of developing a food waste methodology in the EU. Feedback also welcomes the consultation of EU Platform on Food Losses and Food Waste members for their suggestions of improvements. Feedback suggests the following improvements:

1. Extension of measurement to cover harvest food waste, including food that is ready for harvest but wasted at the harvest stage by being ploughed back in or left to rot:

Feedback recommends that the scope of mandatory measurement within the Waste Framework Directive (WFD) be extended to cover harvest food waste. This is within the scope of Article 2 of Regulation (EC) 178/2002. Feedback argues that food that is *ready for harvest*, but which is wasted, should be included in harvest waste measurement – in keeping with Food Loss and Waste (FLW) Standard definitions¹. Ploughing food back into the fields should thus be counted as a food waste destination at harvest level and measured accordingly. Pre-harvest waste can be excluded from measurement for the WFD, if preharvest waste is interpreted as "the stage in food production that occurs before a raw material for food is ready for harvest or slaughter"².

a. Legal basis for including harvest level food waste in EU measurement:

Co-legislators of the WFD provisionally agreed on a definition of food waste: "Food waste" means all food as defined in Article 2 of Regulation (EC) 178/2002 that have become waste." The Commission states that "as the secondary legislation [i.e. the methodology of measurement and quantification of food waste] will be established based on the WFD it will be limited to the scope of the Directive". The exact wording of Regulation (EC) 178/2002 is that "food" shall not include "plants prior to harvesting"³.

Harvest food waste *is* included within the scope of Article 2 of Regulation (EC) 178/2002. The regulation states that "it is necessary to consider all aspects of the food production chain as a continuum from and including primary production [...]"⁴ and that "'primary production' means the production, rearing or growing of primary products including harvesting [...]"⁵. It only excludes "plants prior to harvesting"⁶. Thus, harvest food waste is within scope of the WFD.

Since the Commission wants to harmonise its reporting with the FLW Standard, Feedback recommends that it interpret "plants prior to harvesting" in the same way that the FLW Standard interprets "preharvest food losses": to exclude, that is, "the stage in food production that occurs before a raw material for food is ready for harvest or slaughter"⁷. This phase should be excluded from reporting because it involves comparing "maximum yield potential" with "actual amount ready for harvest"⁸, that is "theoretical vs. actual", so is difficult to measure in the same way as other food waste.

Feedback recommends that the Commission interpret "harvest food waste" (which are within the scope of Article 2 of Regulation (EC) 178/2002 and the FLW Standard) in the same way that the FLW Standard interprets them: food that is ready for harvest – food that is fully mature/grown – but is wasted at the point of or during the harvesting process, as a result of the farmer choosing to plough it back in or leave it to rot. This phase is very possible to measure, because as the FLW Standard points out, it involves "measuring how much was actually ready for harvest and then measuring the actual amount removed from the food supply chain", i.e. comparing "actual vs. actual", like waste measurement at later stages of the supply chain⁹.

The FAO have provisionally excluded preharvest food waste from the scope of SDG 12.3¹⁰ and thus from measurement – but they say that harvest food waste "can be added to the loss coverage and measured with crop-cutting surveys"¹¹ and thus included. Feedback encourages the FLW Standard interpretation of "harvest losses", explained above, to be integrated into FAO FBS database. The FAO's own studies indicate that 36% of Europe's food waste occurs at agricultural level¹².

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If this interpretation is not considered possible, we urge the Commission to do everything within its power to change the provisionally agreed definition of food waste in the Waste Framework Directive so that instead of referring to Article 2 of Regulation (EC) 178/2002 it explicitly includes food “from the point that crops and livestock are ready for harvest” through to the consumer stage.

If neither of the above is possible, and therefore harvest food waste cannot be integrated into the scope of the WFD, then provisions should be made to ensure compulsory harvest food waste reporting as part of CAP or the relevant EU legislation instead. Measures should be taken to integrate this work with the WFD as part of the EU’s progress towards the SDG 12.3, to ensure a whole supply chain approach to food waste, and avoid policies being disjointed and uncoordinated.

b. The case for why harvest level food waste should be included in EU measurement:

EU food waste at harvest level is potentially very significant in scale and environmental impact. The FAO estimate that 36% of Europe’s food waste occurs at agricultural level (this is just harvest level food waste – postharvest food waste accounted for a further 11%)¹³. It is not acceptable that over a third of the EU’s food waste could potentially be excluded from reporting. The FUSIONS estimate for primary production food waste is dramatically lower, at 11% of the EU’s total food waste¹⁴. However, both the FAO and FUSIONS reports are based on very limited data and the real result could be anywhere between these two figures; either way, the scale is significant. WRAP’s provisional (conservative) estimates for UK food waste at primary production are 2.5 million tonnes annually¹⁵, approximately 20% of the UK’s total food waste, and greater than manufacturing and retail food waste combined. Feedback’s own recently published research has found that farmers in the UK waste approximately 10-16% of their crop¹⁶. A recent study of Nordic countries found 10-26% food waste at primary production for fruit and vegetables¹⁷, and another study found 449,000 tonnes of food wasted on Belgium’s farms¹⁸. Feedback’s Gleaning Network has gleaned 100s of tonnes of fruits and vegetables from UK farms, and the potential for redistribution of food waste from farms (though reduction should be prioritised) is huge¹⁹.

Exclusion of harvest food waste from measurement may create perverse incentives for member states and companies to achieve reductions in measured food waste towards the SDG 12.3 target by pushing food at risk of going to waste up the supply chain so it is wasted at harvest level, rather than accounted for at retail level. This could exacerbate the risk of Unfair Trading Practices, which the Commission has expressed a consistent desire to tackle²⁰.

The Food Loss and Waste Protocol²¹ and Champions 12.3²² have both published a Guidance Note authored by the World Resources Institute, which recommends the best practice for nation states in achieving SDG 12.3 is to include preharvest and harvest waste in measurement and targeted reduction. It recommends that:

“one should apply the “halve per capita” in practice to food losses [i.e. pre-retail food waste], as well, not just to food waste”– and that this should cover “from the point that crops and livestock are ready for harvest or slaughter through to the point that they are ready to be ingested by people”²³ (our underlining)

FUSIONS also counted the beginning of the food supply chain as being “When crops are mature for harvest”²⁴. FUSIONS mentioned the challenge of lack of reliable data for primary production, however they also found that more countries had reliable data on primary production food waste than for processing food waste²⁵. Lack of current data only shows the urgent need for the EU to require this data to be gathered in future.

There are methodological challenges for measuring food waste at primary production level – every level of the supply chain provides its own challenges – but there are clear models for how these challenges can be overcome. WRAP have developed a strong model for measurement of primary production food waste, including harvest food waste, which could be rolled out throughout the EU (see the attached PowerPoint presentation slides). The Commission has one year to create a viable methodology to measure preharvest food waste, so there is sufficient time by January 2019 to develop this methodology. Other EU studies have also quantified harvest food waste – for instance, recent studies have covered Nordic countries²⁶, Belgium²⁷, France²⁸, and the UK²⁹ (all of which found higher quantities of food waste than FUSIONS estimates). There are also benefits that make harvest measurement easier than for some other stages of the supply chain – for instance, food waste at primary production is comparatively concentrated (rather than being distributed across millions of separate consumer households), usually a field will grow one food type (rather than multiple food types mixed together) and does not need separating from packaging.

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Feedback agrees with the Commission that, on a very general level, the end of the food supply chain is where “resource efficiency gains and value of food saved are the highest”. However, for many food products, the majority of their environmental impact occurs before or during harvest on the farm, and for some products this environmental impact may be considerable. Agriculture accounts for approximately 10% of the EU’s total greenhouse gas emissions³⁰, 44% of total water abstraction³¹, and 40% of total EU land³², as well as significant impacts on biodiversity and pollution – these impacts could all be significantly reduced through reducing food waste at primary production. The FAO estimate that globally the carbon footprint of food waste during agricultural production is higher than for processing and distribution³³.

Also, whereas consumer food waste is distributed throughout millions of households, one farm may experience hundreds or even thousands of tonnes of food waste at one time at preharvest level, even ploughing in whole fields of food at once. For instance, Feedback’s research found one farmer was wasting 25% of their carrots equal to 1,750 tonnes annually, mainly because of purely cosmetic rejections³⁴, and one UK cauliflower farmer in 2017 was forced to plough 25,000 cauliflowers per week into the field due to a price crash³⁵. This creates economies of scale which mean the right targeted policy changes at preharvest level could have very high environmental impact.

2. Use the term “food waste” for waste occurring at all stages of the supply chain:

We recommend that the term “food waste” is used as much as possible to cover *all* stages of the supply chain, since the term “food loss” implies that human agency is not involved in causing waste before retail level, and that the solutions needed are purely technical. For instance, the FAO characterise pre-retail food waste as “food loss”, which it says is generally “inadvertent”³⁶ and “the result of unintended actions, decisions or situations”³⁷ related to technical infrastructure, whereas food waste at retail and consumer level is generally a “discretionary process”³⁸. Feedback’s evidence suggests that, particularly in developed countries³⁹ but also in developing countries^{40 41}, food waste before retail level is often caused by issues such as power relations across supply chains, unfair trading practices like order cancellations, and rejections due to cosmetic standards – almost all the result of human agency. The food waste versus food loss distinction is also tied to the myth that pre-retailer food waste is lower in developed countries⁴²: FAO research estimates that Europe’s per capita pre-consumer food waste is higher than for any other continent than South America, the majority of Europe’s food waste occurs *before* the retail stage, and significantly more food waste occurs in Europe’s agriculture and processing than at retail⁴³. WRAP also recommend using the term “food waste” to “cover all stages of the supply chain”⁴⁴.

3. Clarify the WFD waste hierarchy for food:

The Waste Framework Directive’s waste management hierarchy clearly lays out the priority for use of waste streams. The European Parliament proposed a specific food waste hierarchy to be enshrined in the WFD⁴⁵, but this faced opposition and was not eventually included. Thus, Feedback recommends that the European Commission issues a clarification of the application of the waste management hierarchy to food, in consultation with the FLW Platform, and in line with the food waste hierarchy recommended by the WRI’s Guidance Note on SDG 12.3⁴⁶ and the FLW Protocol. Food waste is a very specific waste stream with particular uses such as redistribution for human consumption, use as livestock feed and anaerobic digestion, each with very different environmental impacts.

4. Destinations of food waste should be reported separately, according to the stages of the food waste hierarchy:

Feedback recommends that food waste reporting under the WFD should serve two purposes:

1. To report progress towards the SDG 12.3 target – which requires a simple distinction between “food waste” and “not food waste”;
2. To monitor progress towards moving produce further up the stages of the food waste hierarchy (a clarification of the WFD’s waste management hierarchy, suggested above).

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The Commission's current reporting suggestions serve the aim of the first of these purposes well, but do not provide the detail to serve the second purpose. Therefore, Feedback suggests that to monitor and incentivise progress towards moving food waste up the stages of the food hierarchy, **Member States should be obliged to separately report on different destinations for food according to the food waste hierarchy, including those destinations not counted as waste towards the SDG 12.3 target.** In addition to the destinations currently reported by the Commission, this would include separate reporting on:

- Redistribution to food charities
- Diversion to animal feed
- Diversion to biomaterial/processing
- Not harvested (as a result of the inclusion of harvest food waste, mentioned above)

This is in line with the recommendations of the FLW Standard⁴⁷. For instance, if food that is edible to humans is currently being used for livestock feed, Member States should be encouraged to move this food surplus up the hierarchy, preferably through waste prevention in the first instance, and if that is not possible, through redistribution for human consumption via charities. Likewise, food that is not edible to livestock should be moved up the food waste hierarchy from uses such as incineration to higher value uses such as anaerobic digestion.

5. Edible and inedible food waste should be reported separately:

Feedback recommends that edible and inedible food waste should be reported separately, because both have very different potentials within the food waste hierarchy. The Commission raises the concern that cultural differences between countries meant that the boundary between edible and inedible may be difficult to draw. For the very small percentage where this is ambiguous, each member state can overcome this ambiguity: for example, WRAP in the UK conducted an inexpensive consumer survey to ask the public what they considered edible and based its definition on this⁴⁸. However, the vast majority of foods consumed in the EU are unambiguously edible or inedible, and the small percentage which is considered ambiguous should not significantly affect total standardised food waste reporting figures.

6. Measurement of the causes of food waste, and shared supply chain responsibility:

Feedback recommends that the causes of food waste should be measured by all member states in order to develop targeted reduction strategies. This should be integrated into their waste management plans, as stipulated in the WFD. Feedback also recommends that the EU identifies the supply chain actors involved in causing food waste - food waste occurring in suppliers' businesses and consumers' households may often be partially caused by retailers and intermediary buyers, and it is essential that the EU ensures that these actors take responsibility for this food waste, and actively engage in helping reduce it through financial support and policy/behavioural change.

7. Food that is inedible to humans should only be counted as "reduced" if it is used for livestock feed:

Feedback generally commends the cut-off point drawn by the Commission as to what counts as "food waste" and what does not towards the SDG 12.3 target. This line has been drawn so that "food material destined for animal feed or to be used as a by-product in industry is not regarded as waste" but that destinations further down the food waste hierarchy, such as anaerobic digestion, are counted as waste. However, Feedback believes that there is a case for dividing food waste into the categories "edible" and "inedible" (to humans), and recommend that food that is edible to humans should not be counted as reduced if it is diverted to animal feed because this is a suboptimal use for food edible to humans.

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- ¹⁴ FUSIONS (2016), *Estimates of European food waste levels* <http://www.eu-fusions.org/phocadownload/Publications/Estimates%20of%20European%20food%20waste%20levels.pdf>
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- ²³ WRI (2017), *Guidance on Interpreting Sustainable Development Goal Target 12.3* <https://champs123blog.files.wordpress.com/2017/10/champions-12-3-guidance-on-interpreting-sdg-target-12-3.pdf>, p2
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- ²⁵ In EU FUSIONS *Estimates of European food waste levels* (2016), the number of countries who submitted data of sufficient quality on food waste at primary production level was only 6 out of 28 and for processing it was only 4 out of 28 – the lowest coverage of data for any stages in the supply chain.
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