



Feedback consultation response – London Environment Strategy

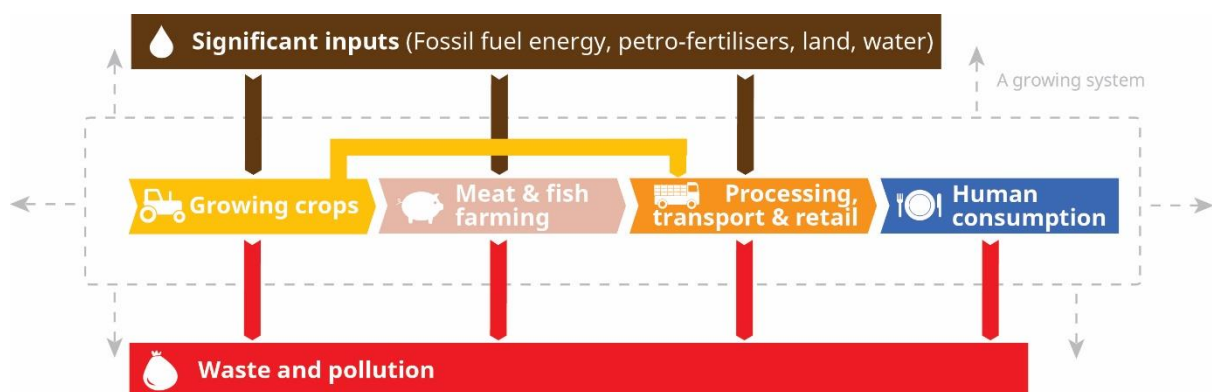
16 November 2017

Introduction

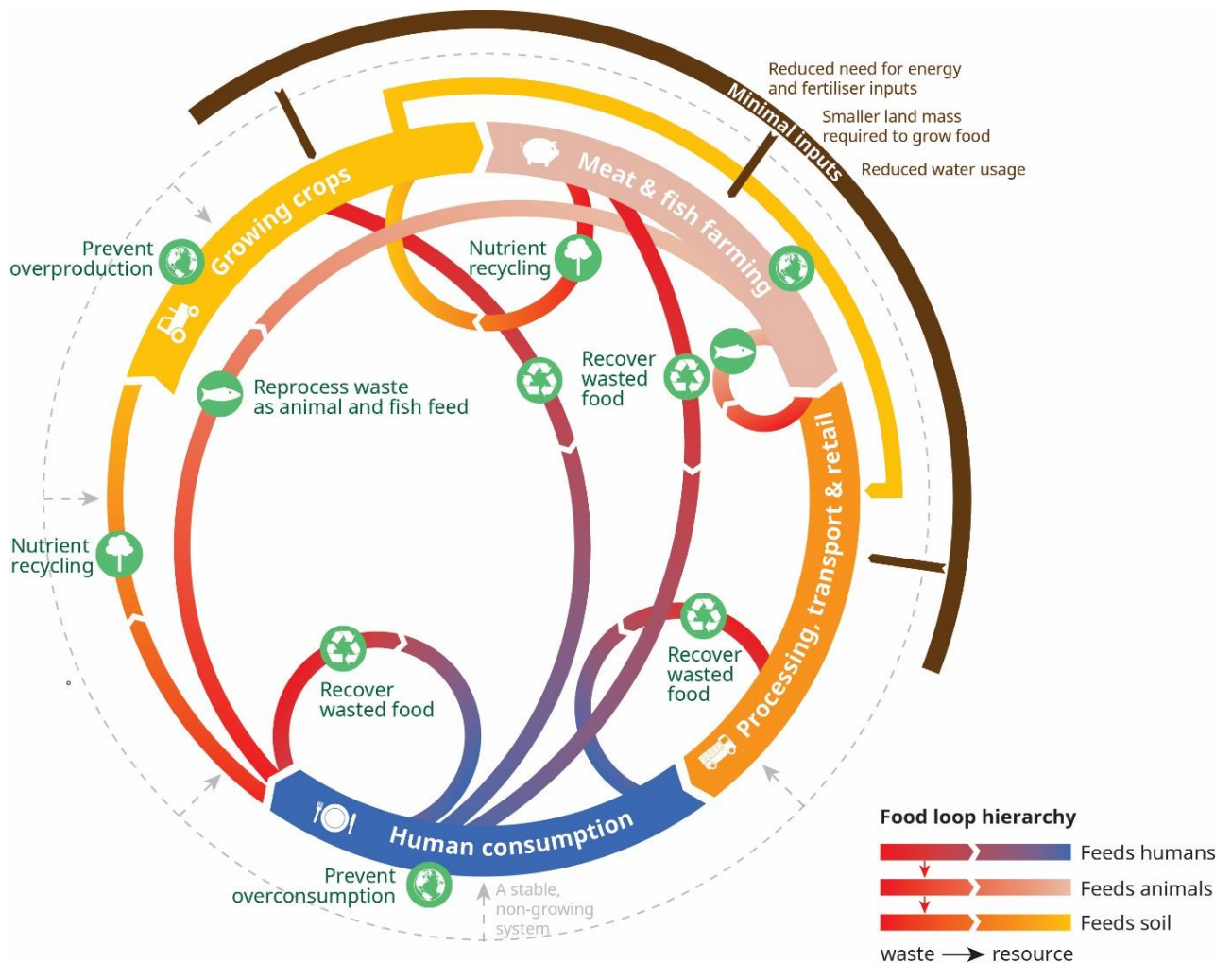
We welcome the level of ambition shown across the board in the draft London Environment Strategy ('the Strategy'). We are excited by the opportunities proposed for London to lead the world's great cities in using circular approaches to achieve transformation change for the good of our environment, climate and London's citizens. However, while we applaud the broad approach set out, we fear that the Strategy is not sufficiently ambitious in one area where London is well-placed to challenge business as usual and demonstrate environmental leadership: preventing food waste.

As the strategy acknowledges the scale of food waste, and its environmental consequences, we will not repeat these here. We support the overarching ambition to make London a Zero Waste city by 2026. However, this target must include provisions to prevent food waste, and to increase the effectiveness of nutrient recycling, according to our model for shifting from a linear food system to a more circular, sustainable food system. Below we set out Feedback's model for understanding the key problems facing our currently linear and growing food system, and our proposal for a sustainable food system.

Linear food system



Our current linear food system is defined by overproduction and waste. Food travel in one direction, from production and processing to consumption and disposal. The process devours huge quantities of resources to grow and transform our food, including petrochemicals and fossil fuel energy. Along the way, huge amounts of food go to waste – at production-level, in processing and in homes - and pollution is generated.



Feedback's model for a sustainable food system

This model is defined by the principle that food surplus and waste has value, and can be used as a resource, as proposed in the Strategy's focus on a circular approach. Under this approach, food surplus should first be redistributed to feed humans, then repurposed to feed livestock and fish, and finally fed to soils through compost and manure. As what was formerly seen as 'waste' is reused, less waste pollution through landfill disposal is created, and fewer inputs into food production are required. This creates a small, circular, low-waste system that fits within

our planetary limits, while sustaining humans on a fair basis. Our recommendations set out some of the ways that we believe the Strategy could integrate a more circular approach to food waste prevention and management to champion a sustainable food system.

Specific recommendations - waste chapter

While we support the Mayor's focus on food waste, we feel that the solutions proposed are not sufficiently ambitious or innovative. London has an opportunity to be among the first cities to commit to the UN Sustainable Development Goal 12.3 to halve food waste by 2030, and to use circular approach methods to achieve this goal.

Feedback's model for a sustainable food system, outlined above, states that edible surplus food must be redistributed for human consumption. Inedible food that is suitable for animal feed should be used for this purpose, with composting or Anaerobic Digestion only the third stage in the hierarchy. We are concerned that the Strategy currently ignores the potential of animal feed as an alternative to other forms of disposal of inedible food waste and scraps, as well as steps to ensure that food surplus that is edible by humans is redistributed into the human food chain.

The strategy may also miss important opportunities to develop London as a pioneer of urban food production and nutrient recycling through local food systems, making most of urban space for growing (e.g. rooftop gardens) and capturing waste for nutrient recycling at a local level. We suggest that the Mayor uses some of his non-regulatory powers to promote experimentation with local food system hubs, for example through a competition.

We also urge the Mayor to consider how he may use his powers to promote greater business participation in food waste prevention, and in particular to promote transparency on food waste among food businesses.

Our specific recommendations are set out below.

7.1.1d We recommend that the GLA group's procurement activities in addition require that food providers to the GLA report on food waste in their operations, and, ideally, in their supply chain.

The group could further require that suppliers commit to Courtauld 2025, or are already committed.

7.1.1c We recommend that the Mayor consider, in addition to the reuse initiatives discussed, opportunities to develop London as a pioneer of urban food production and nutrient recycling through local food systems, making most of urban space for growing (e.g. rooftop gardens) and capturing waste for nutrient recycling at a local level. We suggest that the Mayor uses some of his non-regulatory powers to promote experimentation with local food system hubs. Prototypes could include recycling food waste to maggot farms, with the maggots forming a nutrient rich animal feed. Or local urban and peri-urban agricultural initiatives which also include surplus composting or food waste-fed animal rearing on site, using food waste from the local community.

7.2.2 We recommend that the Mayor consider measures to incentivise or require businesses in the capital to reduce their food waste, to address the 10 million tonnes of food waste produced by food and drink businesses a year, according to WRAP figures.

The Mayor should also consider a blanket ban on the disposal by food businesses over a certain size of any edible surplus food. Any food that is edible should be redistributed to people, for example via redistribution charities such as FareShare.

The Mayor could also consider encouraging local authorities to use their powers in granting environmental and planning permits to require food businesses over a certain size to guarantee measures to reduce their food waste, and to deal with surplus and waste food as indicated by the food waste hierarchy.

7.3 and 7.4 While we agree that more circular and less impactful disposal methods are vital to meeting London's climate and environment targets, we believe that we miss an opportunity by not considering animal feed within the disposal of inedible food waste. The Mayor should use his powers to require waste authorities to explore opportunities to convert inedible food waste to animal feed.

Currently, across the EU 3 million tonnes of former foodstuffs, such as bakery and confectionary foods that cannot be sold, are recycled into animal feed. It is estimated a further 2-4 million tonnes of former foodstuffs could be fed to livestock, reducing land use for feed crops by 1.2%. This would have the result of reducing the climate change impact of waste activities, as per policy 7.3.2. Using food waste as animal feed scores better on 12 out of 14 environmental (e.g. eutrophication and eco-toxicity) and health (e.g. carcinogens) indicators than anaerobic digestion or composting (Salemdeeb, Ramy, et al. (2016) "Environmental and health impacts of using food waste as animal feed: a comparative analysis of food waste management options." Journal of Cleaner Production). Under policy 7.4.1b the Mayor could encourage the development of joint AD and animal feed production sites, to ensure that nutrient recapture occurs in the most appropriate form wherever possible.

To assist food businesses in identifying currently permissible waste to be sent to animal feed, Feedback has produced an easy to use online tool. <http://www.refreshcoe.eu/animal-feed-tool/>.

We will submit this tool to the London Waste and Recycling Board circular economy routemap. We therefore urge the Mayor to support the LWARB in promoting the use of this tool to ensure food waste is disposed of according to the food waste hierarchy wherever possible, in partnership with London's waste authorities.

For more information on animal feed as a solution to the excessive climate impact of both food waste and animal feed agriculture, see <https://feedbackglobal.org/wp/wp-content/uploads/2017/10/The-Pig-Idea-research-summary-july-2017.pdf>