

To the attention of Ms. Stella Kyriakides  
European Commissioner for Health and Food Safety  
European Commission, Rue de la Loi 200  
B – 1049 Brussels

CC: Commissioner Wojciechowski, Commissioner Sinkevičius, Commissioner Gabriel

**Subject: EC commitment on tackling food waste in the Farm to Fork Strategy**

8 July 2020

Dear Commissioner Kyriakides,

The undersigned organisations have welcomed the publication of the European Commission's Farm to Fork (F2F) Strategy for a fair, healthy, and environmentally-friendly food system in May 2020. More specifically, we welcome the announcement of further EU work to reduce food waste and the renewed commitment to achieving target 12.3 of the Sustainable Development Goals, which is to *'halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses'* by 2030.

Food waste should be addressed holistically, as early as from the farm and all the way to the fork. In this regard, we are disappointed by the lack of attention to food waste occurring at the primary production level and the early stages of the supply chain. It must be noted that several studies reveal that the scale of pre-retail waste in Europe is substantial: it is estimated that 30%<sup>1</sup> to 59%<sup>2</sup> of Europe's total food waste occurs at the pre-retail stage, and these numbers are likely to be underestimated.<sup>3</sup>

Accordingly, we would have expected the Farm to Fork Strategy to explicitly include food waste produced at primary level and in food processing as a major concern to be addressed, through appropriate policy measures, including a comprehensive measurement covering unharvested food too, and the setting of reduction targets. Instead, the Strategy focuses mostly on food waste created at retail and consumer levels.

To overcome these challenges, we would like to **share several recommendations** to enlarge the scope and enhance the effectiveness of the EU's work on food waste. In particular, we urge the European Commission to:

**1. Put forward binding targets committing to a 50% reduction by 2030 of all food waste from farm to fork, and bring forward the proposal of binding targets on food waste to the whole supply chain as early as possible, ideally to 2022.**

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<sup>1</sup> EU FUSIONS, Estimates of European food waste levels, 2016. <https://www.eu-fusions.org/phocadownload/Publications/Estimates%20of%20European%20food%20waste%20levels.pdf>

<sup>2</sup> FAO, Global Food Losses and Food Waste, 2011. <http://www.fao.org/3/mb060e/mb060e.pdf>

<sup>3</sup> Baker, Gregory A., Leslie C. Gray, Michael J. Harwood, Travis J. Osland, and Jean Baptiste C. Tooley. 'On-Farm Food Loss in Northern and Central California: Results of Field Survey Measurements'. *Resources, Conservation and Recycling* 149 (1 October 2019): 541–49. <https://doi.org/10.1016/j.resconrec.2019.03.022>.

2. Provide financial support for the comprehensive measurement of unharvested food and food ploughed back into the field at primary production, and to identify the trading practices and policy changes needed to prevent such food waste.

3. Ensure that Common Agricultural Policy (CAP) funds are allocated to Food Loss and Waste prevention actions at farm level, providing recommendations to Member States and supporting the development of Short Food Supply Chains, which lower the risks of generating food waste.

4. Introduce food waste prevention as a central element of mandatory criteria for sustainable food procurement, as part of the wider Green Public Procurement to promote sustainable consumption and production, and reinforce the market uptake of products that generate less waste.

5. For last resort situations where food waste cannot be prevented, review the existing ban on the use of “eco-feed” (animal feed produced from safely treated surplus food including food that may contain meat or from catering) for non-ruminant animals (in particular pigs and poultry) as well as certain rules of the Animal By-Products Regulation.

Given your leading role in the implementation of the Farm to Fork Strategy, and the urgent need to address food waste in a holistic manner, we hope that you will consider the recommendations above to inform any upcoming decisions and initiatives in this regard.

Yours sincerely,

**Signatories:**





# Annex

The scale of food waste at primary production and processing levels is substantial and should not be sidelined. Recent studies reveal that the scale of pre-retail waste in Europe is significant, between 30% (EU FUSIONS<sup>4</sup>) to 59% (FAO<sup>5</sup>) of Europe's total food waste. Both reports are based on very limited data and levels of food waste happening at the primary production stage are likely to be underestimated.<sup>6</sup> If the FAO's estimate is closer to the truth, targeting only retail and consumer waste may miss out 59% of Europe's food waste from the targets. It is highly problematic that such a significant share of the EU's food waste will be excluded from reporting, which in turn prevents the EU from seriously addressing the systemic drivers of food waste and losses such as unfair trading practices.<sup>7</sup>

Despite this, in the F2F Strategy, the European Commission commits to halving food waste only at retail and consumer level, and thus completely overlooks food waste produced at primary stages of the food production, i.e. between harvest and retail stages. By leaving out a binding target on the reduction of food wasted at primary production, manufacturing, and distribution levels, the F2F Strategy shows incoherences with other EU policies:

**A lack of coherence with UN Sustainable Development Goal 12.3 on Food Waste and Food Losses.** The European Commission states that it is “committed to SDG 12.3 of halving per capita food waste at retail and consumer levels by 2030” but does not focus on the second half of the SDG which states “reduce food losses along production and supply chains, including post-harvest losses” by 2030. We therefore call on the Commission and Member States to follow the new methodology for measuring food waste across the whole food supply chain, including wholesale distribution and retail, hospitality, catering, and domestic sectors.

**A lack of coherence with the EU Green Deal and within the Farm to Fork Strategy itself.** In the EU Green Deal's new Circular Economy Action Plan, the Commission commits to propose a target for Food Waste reduction which would comprehensively address the food value chain. Moreover, the F2F Strategy is based on the fact that sustainable food systems require a holistic approach, which impacts the whole supply chain, through cross-level policies. It means to go beyond level-targeted actions that simply cannot address systemic issues. Thus, by involving only retail and consumer-oriented targets, the F2F Strategy misses its original purpose in ensuring a sustainable transition.

**A lack of coherence with the European Union's previous commitments on waste prevention.** Article 9 (g) of [Directive 2018/851/EC](#) stipulates the need for Member States to adopt waste prevention measures so as to “reduce the generation of food waste in primary production, in processing and manufacturing, in retail and other distribution of food, in restaurants and food services as well as in households” with the ultimate aim to reduce food waste along supply chains. Hence, the F2F Strategy misses addressing the primary production, which is in contradiction with previous commitments from the European Union expressed in EU Directive 2018/851.

For these reasons, we urge the European Commission to:

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<sup>4</sup> EU FUSIONS (2016), Estimates of European Food waste levels, p4 <https://www.eu-fusions.org/phocadownload/Publications/Estimates%20of%20European%20food%20waste%20levels.pdf>

<sup>5</sup> Source data behind FAO (2011), Global Food Losses and Food Waste <http://www.fao.org/docrep/014/mb060e/mb060e.pdf>

<sup>6</sup> Baker, Gregory A., Leslie C. Gray, Michael J. Harwood, Travis J. Osland, and Jean Baptiste C. Tooley. 'On-Farm Food Loss in Northern and Central California: Results of Field Survey Measurements'. *Resources, Conservation and Recycling* 149 (1 October 2019): 541–49. <https://doi.org/10.1016/j.resconrec.2019.03.022>.

<sup>7</sup> REFRESH (2017) *Mapping food waste drivers across the food supply chain* [https://eu-refresh.org/sites/default/files/D3.1\\_System%20maps%20and%20analytical%20framework\\_vf\\_rev22.06.pdf](https://eu-refresh.org/sites/default/files/D3.1_System%20maps%20and%20analytical%20framework_vf_rev22.06.pdf)

**1. Put forward binding targets committing to a 50% reduction by 2030 of all food waste from farm to fork, and bring forward the proposal of binding targets on food waste to the whole supply chain as early as possible, ideally to 2022.**

The Farm to Fork strategy commitment to propose binding targets in 2023 to halve EU consumer and retail food waste by 2030 excludes most food wasted in businesses from the concrete targets – excluding food wasted in primary production, manufacturing and catering sectors – which according to some estimates account for a relevant part of the EU’s food waste.<sup>8</sup>

Champions 12.3, the official group of global leaders established by the UN to champion Sustainable Development Goal 12.3 on food waste, recommends a best practice for nation-states. It consists of achieving SDG 12.3 applying the “halve per capita” in practice to food losses [i.e. pre-retail food waste] as well, not just to food waste. Moreover, 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”.<sup>9</sup>

If the European Commission waits until 2023 to propose binding targets to reduce food waste by 50% by 2030, and then has to wait for this to be formally legislated, it will only leave at most 7 years (and probably less) to achieve these targets since EU member states are legally required to measure their food waste in 2020.

Article 9(5) of Directive (EU) 2018/851 states that member states shall measure their food waste “from the first full calendar year after the adoption of that delegated act”<sup>10</sup> – the delegated act on the food waste methodology was adopted in May 2019. Since food waste will therefore be measured from 2020 onwards, it seems a hugely unnecessary delay for these figures to not be reported for 2 years until 2022, and then for another year to elapse before binding targets are proposed. There may be some case for using 2021 as a baseline year for food waste levels since 2020 will be disrupted by coronavirus and therefore may not be representative - but at least data should be collected by 2021. We urge for the deadline for member states to report their food waste data to be brought forward as soon as possible - ideally by early 2022 at the latest, to ensure there is adequate time for member states to implement the targets and for binding targets to be proposed by early-mid 2022 at the latest.

**2. Provide financial support for the comprehensive measurement of unharvested food and food ploughed back into the field at primary production, and to identify the trading practices and policy changes needed to prevent such food waste.**

We welcome that the Farm to Fork Strategy mentions that “the Commission will investigate food losses at the production stage, and explore ways of preventing them”, if this is a reference to measuring food left unharvested in the field. We urge the Commission to take more concrete action on this by providing funding for trial studies to measure robust baseline figures for the level of food wasted in primary production in 2 to 3 member states, with a view to this methodology being rolled out at the EU level. This is in line with Champions 12.3 recommendations, which state that the best practice for nation-states in achieving SDG 12.3 is that the target to halve food waste by 2030 should cover “from

<sup>8</sup> [https://www.europarl.europa.eu/RegData/etudes/etudes/JOIN/2013/513515/IPOL-JOIN\\_ET\(2013\)513515\(SUM01\)\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/etudes/JOIN/2013/513515/IPOL-JOIN_ET(2013)513515(SUM01)_EN.pdf), Table 5

<sup>9</sup> Champions 12.3 (2017), *Guidance on Interpreting Sustainable Development Goal Target 12.3*

<http://flwprotocol.org/wp-content/uploads/2017/08/Champions-12.3-Guidance-on-Interpreting-SDG-Target-12.3.pdf>

<sup>10</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32018L0851>

*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”.*<sup>11</sup> It must be highlighted that food waste at primary production is often caused by the policies of their buyers, such as supermarkets and middlemen, and it must be ensured that farmers are not punished for food waste but instead offered support and protection from policies which lead to the costs and risks of food waste being pushed onto them.

***3. Ensure that Common Agricultural Policy (CAP) funds are allocated to Food Loss and Waste prevention actions at farm level, providing recommendations to Member States and supporting the development of Short Food Supply Chains, which lower the risks of generating food waste.***

Addressing food waste is explicitly mentioned in one of the specific objectives of the CAP post-2020. Member States have limited experience in this regard, and it would therefore be very timely and appropriate for the European Commission to encourage action through the CAP, by providing tailored recommendations to Member States, including on the key interventions that would be needed in this regard: from investments on physical assets such as storage, to improved marketing of produce, advisory services, and innovation projects.

Supporting the development of shorter food supply chains is increasingly demanded by EU citizens, and one of its benefits would be the reduction of food waste that this would entail. CAP funds should increasingly be used to support the development of shorter and more local supply chains, reconnecting cities and rural areas, citizens, and farmers.

***4. Introduce food waste prevention as a central element of mandatory criteria for sustainable food procurement, as part of the wider Green Public Procurement to promote sustainable consumption and production, and reinforce the market uptake of products that generate less waste***

The European Commission has recently published new guidelines on GPP for food and catering services.<sup>12</sup> They include several criteria to address food waste, such as:

- Separate collection of waste produced by catering services
- Conduct measurement of food waste amounts on continuous or period basis
- Training catering staff in waste minimisation, management, and selective collection
- Maximise the redistribution of surplus food as/where appropriate

Nonetheless, the use of these criteria is voluntary, and just a few local public authorities in the EU currently include waste minimisation criteria in their procurement processes for the provision of catering services, such as Barcelona, Hamburg, or Turin. These experiences are still scarce, therefore it is necessary to make mandatory the application of elements from this guide, and open a discussion on ways and conditions which allow the inclusion of locality criteria in tenders.

***5. For last resort situations where food waste cannot be prevented, review the existing ban on the use of “eco-feed” (animal feed produced from safely treated surplus food including food that may contain meat or from catering) for non-ruminant animals (in particular pigs and poultry) as well as certain rules of the Animal By-Products Regulation.***

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<sup>11</sup> Champions 12.3 (2017), *Guidance on Interpreting Sustainable Development Goal Target 12.3*

<https://flwprotocol.org/wp-content/uploads/2017/08/Champions-12.3-Guidance-on-Interpreting-SDG-Target-12.3.pdf>

<sup>12</sup> European Commission (2019). EU green public procurement criteria for food, catering services and vending machines.

[https://ec.europa.eu/environment/gpp/pdf/190927\\_EU\\_GPP\\_criteria\\_for\\_food\\_and\\_catering\\_services\\_SWD\\_\(2019\)\\_366\\_final.pdf](https://ec.europa.eu/environment/gpp/pdf/190927_EU_GPP_criteria_for_food_and_catering_services_SWD_(2019)_366_final.pdf)

For food waste inedible to humans that cannot be prevented from being wasted, the best valorisation option is to use it as animal feed. We welcome that the February draft Farm to Fork Strategy of the European Commission proposed to “review the feed ban rules for feed for non-ruminant animals (in particular pigs and poultry) as well as certain rules of the Animal By-Products Regulation in order to promote more circularity and better valorisation of animal by-products while safeguarding animal and human health”. This clear commitment was removed from the final version. **We strongly encourage the Commission to implement a review of feed ban rules on using “eco-feed” (animal feed made from safely treated surplus food, including food which may contain meat or from catering) for non-ruminant animals**, which could yield enormous benefits from reducing our reliance on soya driving deforestation in precious South American ecosystems to decoupling our feed supply chain from global commodity markets to reducing feed costs driving ever more intensive and damaging livestock farming practices. Rigorous EU-funded research has been conducted showing that eco-feed can in principle be produced from surplus food safely.<sup>13</sup> A test facility is being set up in the Netherlands led by the University of Wageningen and major animal feed companies, with funding from the Dutch government, to finetune the treatment procedures required for feed safety. For more details on the greenhouse gas emissions savings, other benefits, and safety aspects, see the REFRESH policy brief on animal feed.<sup>14</sup>

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<sup>13</sup> Luyckx, K., Bowman, M., Broeze, J., Taillard, D. and Woroniecka, K. (2019) *Technical guidelines animal feed: The safety, environmental and economic aspects of feeding treated surplus food to omnivorous livestock*. REFRESH Deliverable 6.7. Available at: <https://eu-refresh.org/technical-guidelines-animal-feed>

<sup>14</sup> Bowman, M. and Luyckx, K. 2019. “Avoiding food waste through feeding surplus food to omnivorous non-ruminant livestock” EU Horizon 2020 REFRESH <https://eu-refresh.org/avoiding-food-waste-through-feeding-surplus-food-omnivorous-non-ruminant-livestock>