

## **EEB's response to the public consultation on the inception impact assessment on food waste – reduction targets**

The European Environmental Bureau (EEB) welcomes the initiative to propose EU-level targets for food waste reduction. Firstly, we would like to remind that all Member States (MS) committed to achieve the SDGs by 2030, and in particular SDG 12.3 on food waste reduction as a minimum. This commitment has been recalled in the Farm to Fork Strategy (F2F Strategy). Now, it is time to implement it through an EU regulation setting legally binding targets addressing food wastage at all stages, as following the F2F Strategy.

Concerning the scope of the baseline scenario, the EEB encourages the Commission to promote Option S1 and establish a holistic EU binding target of reducing 50% of food waste from farm gate to final consumer (based on the most recent available data). This goes in line with SDG 12.3 (“reduce food losses along production and supply chains, including post-harvest losses”) and the position of the European Parliament that called for “binding targets at every stage of the supply chain, including primary production, pre-retail and retail” in its initiative report on the F2F Strategy. The larger the scope of the target is, the more positive impacts on the environment and climate this initiative will have – for instance in terms of reducing GHG emissions and reducing the pressure on land use and biodiversity.

A target covering only consumer and retail food waste would exclude most food waste in the EU from the scope of the binding targets. It is effectively estimated that 30% to 59% of Europe's total food waste occurs at the pre-retail stage, and these numbers are likely to be underestimated (please find the references in the additional information document). We also encourage the Commission to include in the targets all food waste from the primary production on farms, including unharvested food waste. Indeed, according to the WWF's recent report entitled “Driven to waste: the global impact of food loss and waste on farms”, about 150 million tonnes of food is wasted on European farms (14.6% of total production). Currently, there is no data available in the EU on these types of food waste. The Commission and MS should collect these data and use them as a baseline. Furthermore, the targets should not be achieved by putting all the responsibility and actions at the EU consumer's level neither only by establishing voluntary commitments. On the contrary, they should be achieved by regulatory measures such as clear and realistic labelling, which lies within the obligation of producers. In line with the waste hierarchy, the focus should be on prevention of food waste. The Commission could also consider the options of implementing the EU and national targets by dividing them through actors in the food chain.

Regarding the “expression” and “way the targets are set for Member States”, the EEB encourages the Commission to set a collective EU target of 50% of reduction of food waste by 2030 based on MS contributions (Option T3) as well as express them on absolute amounts in kilograms (Option E2). The 50% EU target should be implemented by making sure that each MS limits food waste per capita per year to the same amount in kg as a cap by 2030. This will ensure fairness among MS by not penalizing those that have already delivered efforts while asking those which are largest waste generators per capita to reach higher reduction. The Commission should consider to create a penalty mechanism for MS that would not reach their national targets.

Finally, we encourage the Commission to focus on “Option 3 (advanced)” in step 2. It could also consider a baseline scenario superior to a reduction of 50%, while 50% reduction being a minimum, following the SDGs commitments.