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European
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POLICY BRIEFING:

Why we need ambitious legally
binding EU Food Waste Targets



**>FEED
BACK EU**

The EEB

The EEB is Europe's largest network of environmental citizens' organisations. We bring together 180 civil society organisations from 38 countries. Together, we work for a better future where people and nature thrive together.

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Feedback EU

Feedback EU is an environmental campaigning charity working for food that is good for the planet and its people. To do so, we challenge power, catalyse action, and empower people to achieve positive change. Our campaigns address food waste, promote sustainable diets, divestment from the industry meat and dairy sector, and create community-led solutions to food system problems.

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Why we need ambitious legally binding EU food waste targets.

Background

In 2015, EU countries signed up to the Sustainable Development Goal 12.3 to reduce food waste by 50% by 2030. Through the revised Waste Framework Directive in 2018, the EU re-affirmed its commitment to meet SDG 12.3. Now, the Commission has the opportunity to propose ambitious legally binding food waste reduction targets for EU member states to ensure it will meet SDG 12.3 and halve EU food waste from farm to fork – and realise the considerable benefits of this for the environment, the economy and food security.

Headline policy recommendations:

We call on the European Commission, EU member states and the European Parliament to support:

- Legally binding targets for EU member states to collectively achieve a 50% reduction in EU food loss and waste by 2030 (**not** lower ambition targets below 50%).
- A 50% reduction in all food loss and waste from farm to fork (50% reduction for primary production, manufacturing and catering sectors, **not** just at retail and consumer level).
- Launch a review of expanding the scope of food waste measurement by EU member states to include food left unharvested or ploughed back in at primary production.

We recommend that in modelling the technical feasibility of achieving these targets, policymakers factor into their modelling:

- The evidence that industry leaders have achieved sufficient speed to achieve 50% reductions by 2030 (see 'Evidence from industry leaders' below).
- The evidence from other environmental legislation that regulation can speed progress compared to voluntary initiatives, raising the progress of whole industries to the level of industry leaders, and beyond.
- The regulatory options open to EU member states to speed progress to reduce food waste, which should be modelled (see 'Regulatory tools to overcome the limits of voluntary action' and Annex B below).
- Progress achieved under voluntary agreements should not be modelled as the upper limit of food waste reductions which are technically feasible, due to their significant limitations.

The Benefits of 50% farm to fork food waste reduction targets.

Ensuring the EU keeps its international commitments, rather than plans to fail

- EU countries promised in 2015 to meet SDG 12.3 to reduce food waste by 50% by 2030¹. Setting the target lower than this is planning to fail – the EU should honour its commitments.
- Halving food waste will help the EU meet its commitments under the European Climate Law, the Global Methane Pledge, the Circular Economy Package, and European Green Deal.

Support for member states to help meet the targets

- Financial and policy framework support from the EU will help member states meet their obligations, helping to unlock the environmental and economic benefits of food waste reduction.
- For member states who have pre-2020 baseline data available, we recommend it be admissible for countries to achieve 50% reduction from a 2015 or later baseline, to reflect existing progress.

Environmental benefits

- At least 6% of the EU's total emissions are caused by food waste².
- Reducing food waste will therefore be critical to meeting the goals of the European Green Deal, waste-to-landfill commitments and Nationally Determined Contributions³.
- Halving EU food waste by 2030 would save an estimated 4.7 million hectares of agricultural land⁴ – this land could be used to produce more food domestically to improve food security and restore nature for carbon sequestration and improved biodiversity.
- At least 14% of EU food production is currently wasted⁵, and if currently unmeasured primary production food waste is included, as much as 29% may be wasted.

Economic savings for EU member states and businesses

- EU FUSIONS estimated the cost to EU countries of food waste at 143 billion euros⁶. Halving food waste from farm to fork could thus save roughly 71 billion euros.
- A study of 1,200 companies across 17 countries found that 99% reported a positive return on investment in food waste reduction⁷, with an average cost-benefit ratio for businesses of 14:1⁸.
- The estimated cost to EU households of food waste is 98 billion euros⁹ - savings from food waste prevention could provide vital alleviation of the cost-of-living crisis exacerbated by the Ukraine war.

A major contribution to EU food security

- The war in Ukraine and resultant food crisis makes it even more imperative that we don't waste valuable food grown in the EU.
- In 2021, the EU imported almost 138 million tonnes of agricultural products from outside its borders, worth a total of €150 billion¹⁰, while wasting an estimated 140.6 million tonnes of food each year. Halving EU food waste from farm to fork could substantially reduce reliance on imports.
- The amount of wheat wasted in the EU is approximately half the amount of Ukraine's wheat exports and a quarter of other grain exports¹¹.
- Meanwhile, 33 million people cannot afford a quality meal every second day in the EU¹².

Why the 50% target must cover from farm to fork

- Member state food waste reporting from 2020 provides a baseline for all sectors – this baseline data should not be wasted.
- 43% of the EU's measured food waste would be excluded from EU food waste targets if only EU retail and household sectors are included – with 26% still excluded even if food service is covered.
- In contrast, a farm to fork target would result in 100% coverage of food waste measured under the EU delegated decision¹³.
- Compared to total food wasted in the EU retail sector (4.1 million tonnes, 7% of total measured food waste in the EU):
 - Over two and a half times more food is wasted in the EU processing and manufacturing sector (10.1mt, 18% of total)
 - More food is wasted in the EU restaurant and food service sector (5.3mt, 9% of total)
 - More food is wasted in the primary production sector (6.2mt, 11% of total)
 - The above figures only refer to food waste measured under the scope of the EU delegated decision. In addition to this, food left unharvested or ploughed back in on-farm is currently excluded from measurement. If this was also measured, based on the most robust up-to-date data, primary production food waste would be up to 60% of EU food loss and waste¹⁴.
- A whole supply chain approach is essential to guarantee joined-up, not siloed, thinking.
- Focus on retail and consumer food waste only risks creating perverse incentives for food waste to be offloaded onto primary producers and processors rather than reduced.
- Champions 12.3, an international coalition of executives from governments, businesses, and civil society leading global food waste action, recommend that states should interpret SDG 12.3 target as a 50% reduction in all food loss and waste from farm to fork, including “food losses” [i.e. pre-retail food waste], not just food waste at the retail/consumer-level¹⁵.

Support for 50% farm to fork food waste targets

Overwhelming civil society and public support

- Over 50 organisations from 20 EU countries have signed a statement¹⁶ calling for the EU to introduce legally binding targets to halve EU food loss and waste from farm to fork by 2030 – and to review extending the scope of EU food waste measurement to cover food left unharvested on farms.
- In 2017, over 125,000 EU citizens signed Change.org and Global Citizen petitions, in 10 languages, calling on the EU to introduce a “binding target to cut EU food waste by 50% by 2030, from farm to fork”¹⁷.

The European Parliament have been calling for 50% food waste targets for over a decade

- In 2012, the European Parliament called on the Commission to “to take practical measures towards halving food waste by 2025” including “specific food waste prevention targets for Member States”¹⁸.
- In 2016, the EU Court of Auditors heavily criticised the Commission for insufficient progress on food waste goals¹⁹.
- In 2017, the European Parliament again called on Member States to “take the measures required to achieve a Union food waste reduction target of 30% by 2025 and 50% by 2030”, covering “the whole supply chain, including in primary production, transportation, and storage” and for “the Commission to examine, by 31 December 2020, the possibility of setting up binding Union-wide food waste reduction targets to be met by 2025 and 2030”²⁰.
- As a result of triologue negotiations with the Commission and Council the implementation of legally binding food waste targets was delayed until 2023²¹.

50% farm to fork reduction is ambitious, but achievable

Evidence from industry leaders

- There is ample evidence from industry leaders and member states that food waste reduction can be achieved at sufficient speed to meet 50% reductions by 2030, with the right ambition. For instance:
 - At its growing, packing and processing sites in Spain and the UK, G's Fresh achieved a 43% reduction in food waste between 2017/18 and 2019/20, equal to over 21% reduction per year and over 20,000 tonnes food waste reduced²².
 - In Kellogg Company's global manufacturing operations, it reduced its food waste tonnage by 17% relative to total food handled between 2016 and 2019, equal to 5.6% per year reductions²³.
 - IKEA have cut production food waste in their restaurants, bistros and Swedish Food Markets by 46% since 2017²⁴, equal to about 9% reduction per year.
 - In retail, Carrefour achieved food waste reduction of 28.7% between 2016-20, equal to about 7% reductions per year²⁵.
 - Kroger achieved food waste reduction in their supermarkets of 19.3% between 2017-20, which is a reduction of about 6.4% per year²⁶.
 - Governments have also been able to achieve significant gains. In Denmark, concerted action by the government and businesses to reduce food waste across the whole supply chain saw levels of food waste in retail/wholesale and food service fall by 13% and 11% per year respectively between 2014 and 2018^{27,28}.

Regulatory tools to overcome the limits of voluntary action

- Progress achieved under voluntary agreements should not be seen as the upper limit of food waste action, including when the EU and member states model the feasibility of different food waste targets. Voluntary agreements have important limitations: most importantly, there are many free riders and laggards who slow overall progress, without any penalties for non-compliance. Other limitations include: key sectors are often not covered (e.g. processing), participation from businesses within each sector is often limited, and most businesses fail to report their food waste data publicly.
- There is strong evidence from other sectors that regulation can yield far faster progress than voluntary measures, by levelling the playing so that laggards are brought up to the level of industry leaders. For instance:
 - After limited voluntary progress, Portugal introduced a small charge on lightweight plastic bags in 2015, which successfully reduced the use of plastic bags at stores and supermarkets by more than 90%²⁹.
 - There is a strong correlation between landfill taxes and bans and reduction in landfilling in EU countries, showing that regulation accelerates action³⁰.
 - EU-level regulations on air quality in Europe were implemented between 2004–2015, and overall emissions of key air pollutants have declined since 2005³¹.
- There are many regulatory tools member states have at their disposal to speed the progress of free riders and laggards, to ensure that whole sectors match the food waste transparency and reduction achieved by industry leaders. See Annex B for further info on some of these policies. For instance:
 - Mandatory measurement and reporting by food businesses over a certain size
 - Mandatory participation in food waste reduction agreements and reduction targets for businesses over a certain size
 - Bans and taxes on harmful practices, such as landfill and incineration
 - Legal obligations for businesses to follow the food use hierarchy, or face penalties
 - Stronger Unfair Trading Practices legislation, with an explicit food waste focus
 - A levy on retailers proportional to the food waste levels of their suppliers

Why measurement should be extended to cover all primary production food waste

What food waste is currently excluded for the EU delegated decision

- The EU delegated decision on food waste measurement currently argues that food waste excludes “plants prior to harvesting” under Article 2 of Regulation (EC) 178/2002 and “natural non-hazardous agricultural or forestry material used in farming [...] which does not harm the environment” under Article 2(1)(f) of Directive 2008/98/EC³².
- Since most food wasted at primary production is either edible food left unharvested in the field, or food used on-farm post-harvest e.g. ploughed back into the field, this definition excludes most on-farm food waste from measurement.

The huge scale of EU primary production food waste

- An estimated 150 million tonnes of food are wasted on farms in Europe (14.6% of total food production), according to the most up to date meta-study on global on-farm food loss and waste, based on 175 farm-stage food loss and waste data points in Europe³³.
- Assuming the same per capita food waste in EU countries as in Europe, this means that approximately 90 million tonnes of food waste occurs at primary production in the EU.
- For comparison, an estimated 50.8 million tonnes of food waste occurs at all other stages of the supply chain in the EU, including households, retail, processing and food service (see Annex A).
- This means that up to 60% of total EU food loss and waste may currently be excluded from measurement under the delegated decision.
- Contrary to popular belief, food waste on farms is actually higher in high-income countries than in low-income countries, as a per capita basis and as a percentage of production, according to the most up to date meta-study, based on 2,172 farm-stage food loss and waste data points globally³⁴.

Farmers suffering from food waste

- Investing time, effort and resources into growing food, only for 14.6% of it to be wasted, is a huge loss of potential revenue for farmers.
- Much food wasted on European farms is caused by unequal power relations with supermarkets and other powerful supply chain actors, whose policies can drive food waste on farms. For instance, policies include rejecting produce on cosmetic grounds, unfair trading practices like last-minute order cancellations, and use of contract types which incentivise overproduction³⁵.
- There is a risk that by excluding primary production food waste from measurement, perverse incentives will be created to “disappear” food waste from official figures by pushing it onto farmers, worsening unfair trading practices.

Support for including primary production food waste in measurement

- In 2017, the European Parliament called for an EU target to reduce food waste by 50% by 2030, covering “the whole supply chain, including in primary production”³⁶.
- As referenced above, in 2017 over 125,000 EU citizens and 67 European organisations from 20 EU countries called for binding targets to halve EU food waste by 2030, including food waste on farms³⁷.
- Champions 12.3 recommend that in meeting SDG 12.3, it is best practice for food waste measurement to include “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”³⁸.

Legal routes to inclusion

- If the Commission decides that measurement of primary production food waste is legally outside of the scope of the EU Waste Framework Directive, then we recommend that the Commission should introduce measurement through other legal avenues such as the CAP.

Annex A – EU food waste figures

We have used the most up-to-date official EU Eurostat data for EU food waste levels in 2020, published in October 2022, with WWF data to fill in the data gap for most primary production food waste (see below):

Table 1: Food waste levels in the EU per sector, in millions of tonnes

Sector	Annual waste, in millions of tonnes	Source
Primary production	89.8 (6.2)*	WWF-UK, 2021 ³⁹
Processing & manufacturing	10.1	EUROSTAT, 2022 ⁴⁰ (data from 2020)
Retail and other distribution of food	4.1	EUROSTAT, 2022 ⁴¹ (data from 2020)
Restaurants and food services	5.3	EUROSTAT, 2022 ⁴² (data from 2020)
Households	31.2	EUROSTAT, 2022 ⁴³ (data from 2020)
Total	140.6	

* WWF's meta-study based on 175 of the most up-to-date data points on food waste at primary production in Europe found that an estimated 150 million tonnes of food are wasted on farms in Europe – assuming the same per capita food waste in EU countries as in Europe, this means that approximately 89.8 million tonnes of food waste occur at primary production in the EU. EUROSTAT data reports only 6.2 million tonnes of food wasted at primary production because this figure excludes food left unharvested or used in farming (e.g. ploughed back into the field) – which is the majority of food wasted at farm level – Feedback thus estimate that 83.6 million tonnes goes unreported under the current methodology.

Annex B – Further info on regulatory options for food waste prevention

Mandatory measurement and reporting by food businesses over a certain size

- The UK government is currently proposing to introduce mandatory food waste reporting for all businesses over a certain size⁴⁴.
- If all medium and large sized businesses reported their food waste in England, this would cover 98% of food wasted at retail, 93% in manufacturing, 60% in food service and an unknown quantity at primary production⁴⁵.
- The UK government has produced a detailed impact assessment, finding that mandatory food waste reporting would be cost-effective⁴⁶. It found that measurement would cost only £12.55 per tonne of food waste targeted when measuring food waste in large sized businesses, and if medium-sized businesses are included in measurement too, it would still only cost £19.18 per tonne⁴⁷.
- The impact assessment states that only 8,818 tonnes of food waste would have to be reduced over 10 years to offset the costs of measuring food waste in medium and large sized businesses⁴⁸ - thus, businesses would only have to achieve a 0.5% reduction in the 1,907,777 tonnes of food wasted by England's large and medium-sized businesses over 10 years, for the costs of reporting to be offset, and any food waste reductions beyond this would be savings.
- Mandatory reporting was proposed because voluntary food waste reporting by businesses is widely accepted to be a failure. 70% of UK Food Waste Reduction Roadmap signatories were still not reporting data publicly in 2021, which WRAP called "disappointing", leading them to conclude "mandatory food surplus and waste reporting are essential if SDG 12.3 is to be achieved"⁴⁹. Calls for mandatory reporting have also been made by supermarket Tesco⁵⁰ and the House of Commons EFRA committee⁵¹.

Mandatory participation in food waste reduction agreements and reduction targets for businesses over a certain size

- These would be complementary to mandatory food waste reporting and build on its strengths – creating sector-wide coverage to avoid low participation and free riding from businesses, which limits voluntary agreements. The UK has committed to consulting on the introduction of mandatory food waste reduction targets for large food businesses in future⁵².

Bans and taxes on harmful practices, such as landfill and incineration

- Taxes on incineration and landfill are valuable tools for member states to disincentivise food waste going to these lowest stages of the waste hierarchy. For instance, the Netherlands has a tax on waste sent to both incineration and landfill⁵³.
- Bans on incineration and landfill should also be considered. For instance, in 2022 Scotland introduced a moratorium on the building of new waste-to-energy incinerators⁵⁴.

Legal obligations for businesses to follow the food use hierarchy, or face penalties

- Spain have recently approved a draft law which would require businesses to follow a food waste hierarchy⁵⁵. Although the law is imperfect, because it omits the most important stage of the hierarchy – prevention, which should be prioritised – it is a useful example of what stronger laws might look like. For instance, it includes legal responsibilities for retailers to discount food which is close to its use by date, and for caterers to give customers an option to take home any leftover food.
- Laws such as Spain's could be strengthened to tackle food waste which is caused by businesses like supermarkets in their suppliers. For instance, restrictions could be placed on purely cosmetic standards for fresh produce, or laws could encourage whole crop purchasing or contracts based on hectareage so retailers market the yearly variations in crop yields more flexibly.

Stronger Unfair Trading Practices legislation, with an explicit food waste focus

- The EU's introduction of Unfair Trading Practices (UTP) legislation has great significance for reducing food waste – such as through restrictions on “Short-notice cancellations of perishable agri-food products” and “Return of unsold products”⁵⁶.
- Proper transposition, funding and enforcement of these UTP regulations will be essential to prevent food waste being caused by powerful supply chain actors in their suppliers.
- This legislation could be strengthened with an explicit food waste focus by member states to tackle other unfair trading practices which lead to food waste, based on anonymous surveys and focus groups with at risk groups like farmers. For instance, protections could be provided against:
 - Changing cosmetic specifications as an excuse to cancel orders
 - Threats of de-listing, if the farmer under-supplies due to weather variations out of their control (this would avoid incentives for farmers to overproduce excessively)
 - Contracts which transfer most of the costs and risks of food waste to farmers (instead, encouraging whole crop purchasing and contracts based on hectareage)

A levy on retailers proportional to the food waste levels of their suppliers

- A levy on retailers proportional to the food waste in their suppliers would internalise the cost of this food waste, creating an incentive for them to work with their suppliers to take a shared responsibility to reduce food waste.
- This would help incentivise retailers to amend their policies to help their suppliers reduce food waste – such as by relaxing cosmetic standards, adopting whole crop purchasing, adopting contracts based on hectareage and reducing unfair trading practices.
- The proceeds from the levy could help raise funds to measure and prevent food waste – sharing best practice, and particularly supporting businesses in more fragmented sectors like primary production.

Why we haven't included regulation aimed at incentivising food donations in this list

- Regulation should prioritise food waste prevention because surplus food donation and redistribution can only be a short-term sticking plaster solution to both food waste and poverty. Member states should prioritise policies to design food waste out of the system – whilst providing strong social safety nets and worker protections so people do not have to rely on charities to survive⁵⁷.

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