

# Policy Briefing: EU food waste recommendations for trilogues

## Summary & Key Recommendations

An estimated 40% of food is wasted globally<sup>1</sup>, which causes an estimated 8–10% of global emissions<sup>2</sup>, and uses an estimated 28% of the world’s agricultural land area, larger than China and India combined<sup>3</sup>. 65 organisations from 20 EU countries have signed a [statement](#) calling for the EU to introduce legally-binding targets to reduce EU food loss and waste by 50% from farm to fork by 2030. This briefing provides evidence that more ambitious legally-binding food waste reduction targets for EU Member States under the Waste Framework Directive (WFD) are feasible, will result in significant cost savings, and improve EU food security. Whilst we advocate for 50% reductions in food loss and waste from farm to fork, recognising the context of compromises in the current negotiations, we make the following recommendations:

- Manufacturing and processing:** We recommend that targets for manufacturing and processing sector food waste should be set at least at 20%, in line with the European Parliament’s proposals. A 10% target is far too low, will undermine EU food waste action, and is not justified by the evidence. We present evidence that the UK has achieved over 27% reductions in manufacturing food waste over 10 years, and many large manufacturers have achieved rates of food waste reduction in line with 30%, 40%, and even 50% reductions by 2030.
- Households, retail, restaurants, and food services:** We commend the European Parliament’s proposal for 40% reductions in per capita food waste in households, retail, restaurants, and food services, and recommend that the Council and Commission back at least this level of ambition. We present evidence that food waste reductions of at least this speed are feasible.
- Primary production:** We recommend that the EU extends the mandatory measurement of primary production food waste to cover food that is left unharvested or ploughed back into the fields, and reviews the inclusion of primary production in food waste reduction targets – in line with European Parliament and Council proposed amendments.

## Toine Timmermans, former coordinator for EU FUSIONS and EU REFRESH (flagship EU food waste programmes) and now Director at Stichting Samen Tegen Voedselverspilling (Netherlands’ voluntary food waste agreement):



“The European Parliament’s proposed food waste targets are ambitious but feasible, if we take a systemic and collaborative multi-stakeholder approach – **I would urge EU policymakers to raise the extremely low targets for manufacturing to at least 20%, and raise targets for other sectors to 40%, in line with the Parliament’s proposals.** A 50% reduction in total food waste is within reach for both the retail and food service sectors, with a more strategic approach drawing on policies like state-of-the-art forecasting algorithms, quality driven replenishment systems, and markdown policies. At household level, a 40% reduction in food waste would be highly ambitious but feasible – reductions can be accelerated through changes in retailer and producer policies such as offering smaller portion sizes and packages, and communicating more clearly about food preservation and best-before dates on packaging. **In the manufacturing sector, multiple Dutch manufacturers have shown that 50% reductions are also possible, and the target should certainly be set far higher than 10% – a target this low won’t give incentives to the sector to speed up actions and is a huge missed opportunity.** Excluding primary sector in the scope for the binding targets is a huge omission, as it is important to have an integrated, whole system approach – so it is essential that we start to measure unharvested food waste from this sector and review in future the inclusion of this sector within reduction targets.”

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**Note:** This Policy Brief was written on behalf of the Prevent Waste Coalition, consisting of Feedback EU, Zero Waste Europe, the European Environmental Bureau, Too Good To Go, and Safe Food Advocacy Europe.

Ambitious food waste reduction targets are feasible for all EU Member States, regardless of when they started to take action. Member States who have already spent many years measuring and reducing food waste are permitted to use earlier baseline years than 2020, where data is available. This means they are rewarded for their existing achievements, and a slower pace of food waste reduction is required. At the same time, countries who have only started measuring and reducing food waste from 2020 have the benefit of being able to learn from those who have pioneered reductions in food waste over the last ten years – they can copy successful policies, and thus achieve the faster pace of food waste reduction necessary to catch up.

Even when using a 2020 baseline, there is strong evidence that food waste reduction can be achieved at sufficient speed to meet ambitious food waste reduction targets by 2030. In Figures 2 and 3, we show evidence of some of the world’s largest companies and countries achieving the necessary speed of food waste reduction (colours show compatibility with different food waste targets as indicated in Figure 1). The below table shows the speed needed to reach 2030 targets if a 2020 or 2015 baseline is used.

Figure 1

### Annual food waste reduction required to meet different food waste targets

Overall food waste reduction target by 2030 (%)	Annual food waste reduction needed to meet target using 2020 baseline (%)	Annual food waste reduction needed to meet target using 2015 baseline (%)	COLOUR KEY for tables below
50%	5%	3.3%	Compatible with 50% reductions by 2030
40%	4%	2.7%	Compatible with 40% reductions by 2030
30%	3%	2%	Compatible with 30% reductions by 2030
20%	2%	1.3%	Compatible with 20% reductions by 2030

## PROCESSING AND MANUFACTURING

We particularly recommend setting higher targets for manufacturing and processing, as these are currently set unjustifiably low – which is unfair and inconsistent. Existing evidence overwhelmingly shows that it is feasible to reduce food waste in the processing and manufacturing sector at a faster rate. The Commission’s Impact Assessment provides no evidence to justify proposing such an extremely low 10% reduction target for manufacturing and processing – providing only anecdotal claims from some manufacturers that “potential for further reduction” is “limited”<sup>4</sup>, a claim which is incorrect. The UK has achieved a 27.4% reduction in manufacturing food waste over 10 years (see Figure 3), proving that reductions of at least 25% are feasible, which would be in line with the targets recommended by the UNFSS Coalition on Food is Never Waste<sup>5</sup>. Beyond this, many of the world’s largest processors and manufacturers have proved that far faster levels of reduction are possible – consistent with 30%, 40%, or even 50% reductions by 2030 – demonstrated in Figure 2 below. In addition to the companies below, many more manufacturing businesses have committed to achieving 50% reductions in food waste in their businesses in the future, including Mars<sup>6</sup> and Nestlé<sup>7</sup>, among others, indicating that they regard this as feasible.

Figure 2

### Food waste reductions achieved by key companies/sectors in processing and manufacturing

Country/Business	Annual food waste reduction achieved (%)	Start year – End year	Total % reduction achieved over period
<b>G's Fresh</b> (growing, packing, and processing sites in Spain & UK) <sup>8</sup>	21%	2018 – 2020	43% over 2 years
<b>Kellogg Company*</b> (global manufacturing operations) <sup>9</sup>	7%	2016 – 2022	42% over 6 years
<b>Danone*</b> (processing and supply chain) <sup>10</sup>	6.8%	2020 – 2022	13.5% over 2 years
<b>Unilever*</b> (global direct operations) <sup>11</sup>	5.6%	2019 – 2022	17% over 3 years
<b>Campbell's</b> (processing and manufacturing) <sup>12</sup>	3.5%	2017 – 2022	18% over 5 years
<b>McCain</b> (global direct operations) <sup>13</sup>	3.2%	2020 – 2023	9.5% over 3 years
<b>UK manufacturing sector</b> (whole sector) <sup>14</sup>	2.7%	2011 – 2021	27.4% over 10 years

\* Food waste percentage reductions presented per tonne food handled for this company.

## HOUSEHOLDS, RETAIL, RESTAURANTS, AND FOOD SERVICE

We commend the European Parliament's more ambitious proposals for 40% reduction targets to reduce household, retail, restaurant, and food service food waste by 2030. The example of the Netherlands demonstrates that such a target is realistic. The country has achieved an impressive 35% reduction in retail sector food waste over 5 years, consistent with reductions in excess of 50% over 10 years. The Netherlands has also achieved a pace of food waste reduction consistent with an over 40% reduction over 15 years (or 30% reduction over 10 years) in the household sector. Beyond this, many of the world's largest retailers have proved that far more rapid levels of reduction are possible – consistent with 50% reductions by 2030.

Figure 3

### Food waste reductions achieved by key companies/sectors in retail and consumption (restaurants, food services, and households)

Country/Business	Annual food waste reduction achieved (%)	Start year – End year	Total % reduction achieved over period
<b>Compass Group</b> (food services, 2000 sites in 26 countries) <sup>15</sup>	28%	2020 – 2021	28% over 1 year
<b>Iberostar</b> (food services, 48 hotels) <sup>16</sup>	28%	2023	28% over 1 year
<b>Ingka Group / IKEA</b> (restaurants, bistros, and Swedish Food Markets) <sup>17</sup>	10.8%	2017 – 2022	54% over 5 years
<b>ISS</b> (food services) <sup>18</sup>	7.5%	2019 – 2023	30% over 4 years

<b>Lidl</b> (retail supermarkets) <sup>19</sup>	7.2%	2016 – 2022	43% over 6 years
<b>Netherlands retail sector*</b> (whole sector) <sup>20</sup>	7%	2018-2023	35% over 5 years
<b>Carrefour</b> (retail supermarkets) <sup>21</sup>	6.7%	2016 – 2022	39.9% over 6 years
<b>Kroger</b> (retail supermarkets) <sup>22</sup>	5.2%	2017 – 2022	26.2% over 5 years
<b>Ahold Delhaize</b> (retail) <sup>23</sup>	4.7%	2016 – 2023	33% over 7 years
<b>NorgesGruppen</b> (wholesale/retail) <sup>24</sup>	4.7%	2015 – 2022	33% over 7 years
<b>Netherlands household sector*</b> (whole sector) <sup>25</sup>	3.3%	2015 – 2022	23% over 7 years

\* Per capita.

## FEASIBLE AND NECESSARY

The data above shows that ambitious food waste reduction is feasible, so EU Member States can be confident that ambitious targets are achievable. At the same time, making targets legally-binding is necessary to stretch ambition so that Member States catch up to food waste leaders by copying their effective policies. EU Member States need to introduce policies to ensure that all companies reach the same levels of reduction as industry leaders, levelling the playing field for businesses.

## BOOSTING 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 – particularly whilst 33 million people cannot afford a quality meal every second day in the EU<sup>26</sup>. In 2021, the EU imported almost 138 million tonnes of agricultural products from outside its borders, worth a total of €150 billion<sup>27</sup>, while wasting at least 59 million tonnes of food each year<sup>28</sup>. The amount of wheat wasted in the EU is approximately half the amount of Ukraine's wheat exports and a quarter of other grain exports<sup>29</sup>. Halving EU food waste from farm to fork could substantially reduce reliance on imports.

## REDUCTION OF INEDIBLE FOOD WASTE THROUGH PREVENTION AND ANIMAL FEED

The proposed legally-binding targets to reduce EU Member State food waste currently cover both the edible and inedible parts of wasted food. It is vital to highlight that **it is possible to reduce inedible food waste through prevention of overproduction and overconsumption**, where the food is not produced or purchased in the first place – this reduces both the inedible and the edible parts. For instance, a business can reduce overproduction or overstocking of food, ensuring it does not end up with surplus which it cannot sell. Conversely, consumers can ensure they do not overbuy more food than they need.

Moreover, **food which is inedible to humans can also be reduced by diverting it to animal feed**, which does not have to be measured as food waste under the Delegated Decision establishing a common EU methodology to measure food waste<sup>30</sup>, and counts towards food waste reduction targets. This is most relevant to the processing, manufacturing, retail, and primary production sectors, where many types of food waste are

legal to send for use as animal feed – this makes achievement of food waste reduction in these sectors (for both edible and inedible parts) easier<sup>31</sup>. For instance, brewer’s grains, bread, and fruit and vegetable waste are all viably used as animal feed, providing safety criteria have been followed.

## HUGE COST SAVINGS FOR BUSINESSES AND HOUSEHOLDS

A study of 1,200 companies across 17 countries found that 99% reported a positive return on investment in food waste reduction<sup>32</sup>, with an average cost-benefit ratio for businesses of 14:1<sup>33</sup>. EU FUSIONS estimated the cost to EU countries of food waste at 143 billion euros<sup>34</sup> – meaning billions of euros in potential savings from food waste reduction. Policymaker interventions are required to solve these cross-supply chain problems and unlock these savings. Currently, food waste is often caused by one entity and the cost is born by another – these externalities are a classic example of market failure. For instance, supermarket policies such as cosmetic rejections and unfair trading practices (e.g., last-minute order cancellations and take-back agreements) cause food waste in their suppliers – and policies such as unclear expiry dates, packaging, and portion sizes drive food waste in households. It is inaccurate to claim that there is limited potential for businesses to reduce their food waste because they already have an “inherent economic incentive to reduce food waste”<sup>35</sup>, as food waste is often due to externalities.

## POLICY TOOLS AVAILABLE TO MEMBER STATES TO SPEED FOOD WASTE REDUCTION

There are many tried and tested tools available to policymakers to accelerate action on food waste, including:

- Greater cross-supply chain cooperation
- State-of-the-art forecasting algorithms
- Relaxation of cosmetic standards
- Offering smaller portion sizes and packages to consumers
- Communicating more clearly about best practice for food preservation to consumers
- Markdown policies and dynamic in-store discounts
- Educational programmes
- Improved expiry date management

Beyond this, there are many policy tools which would accelerate food waste action beyond the pace of voluntary measures by businesses alone:

- Mandatory measurement and public reporting of food waste by large food businesses – such as is currently being considered by the UK<sup>36</sup>.
- Bans and taxes on sending food waste to landfills and incineration. For instance, the Netherlands has a tax on waste sent to both incineration and landfills<sup>37</sup>.
- Legal obligations for businesses to follow the food use hierarchy, or face penalties. For instance, Spain has introduced a draft law on the food waste hierarchy<sup>38</sup>, although it omits food waste prevention – countries seeking to replicate should include food waste prevention as the top priority of the hierarchy.
- Mandatory participation in food waste reduction agreements and reduction targets for large businesses.
- Stronger Unfair Trading Practices legislation, with an explicit food waste focus.
- A levy on retailers proportional to the food waste levels of their suppliers.

## THE IMPORTANCE OF EXTENDING REPORTING AND TARGETS TO COVER PRIMARY PRODUCTION FOOD WASTE

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/EC<sup>39</sup>. 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.

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 Europe<sup>40</sup>. 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 54.6 million tonnes of food waste occurs at all other stages of the supply chain in the EU, including households, retail, processing and food service. 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 globally<sup>41</sup>.

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, as well as a substantial harm to European food security. 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 overproduction<sup>42</sup>. 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.

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”<sup>43</sup>. 65 organisations from 20 EU countries have signed a [statement](#) calling for the EU to introduce legally-binding targets to reduce EU food loss and waste by 50% from farm to fork by 2030 – including all food wasted on farms. 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”<sup>44</sup>.

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.



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