



Zero Waste Europe's feedback on the food waste reduction target roadmap

Policy Briefing

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Towards a zero food waste food system

Zero Waste Europe welcomes the initiative of the European Commission to start the process to set-up binding food waste reduction targets across the EU. Food waste is a multifold problem that not only causes environmental and climate damage but is also morally unacceptable.

Therefore, it is essential to properly address this issue by adopting efficient and ambitious targets for the coming years.

I. General considerations:

- [The European Parliament's resolution on the Farm to Fork strategy](#) gives a full mandate for the European Commission to maintain a high level of ambition through the process;
- Although those targets might only enter into force in 2023 after the first data reporting in 2022, this should not be a reason for lowering the ambition. The 50% food loss and waste reduction target by 2030 (SDG 12.3) has been voted by all UN member states in 2015 and is part of the [revised Waste Framework Directive \(Directive 2008/98/EC\)](#) adopted in 2018. This process should only come as an addition, making those targets binding at the EU level and matching the bloc's ambition on sustainability and climate change. If anything, this should trigger more ambitious obligations to ensure the targets are met by 2030;
- In addition to making those targets binding, we want to underline that citizen's awareness or voluntary commitments will not be sufficient to achieve the 50% reduction goal. The responsibility should not be put on consumers but instead, on the actors shaping the food system, through binding measures and financial incentives;
- As underlined in the Farm to Fork strategy, tackling food loss and waste should be done holistically as one piece of the EU transition to a sustainable food system. This means addressing food waste across the whole supply chain and making the connection with other pieces of the transition such as zero-packaging food, deposit return schemes or community-supported agriculture;
- A specific consideration should be given to harvest food losses at the primary production level. Food loss at this stage has been excluded from the EU methodology for food waste measurement but [it is proven that harvest food losses are constantly underestimated](#). Ambitious measures to address food waste should therefore include it under the scope of the binding targets;
- The process should make an explicit reference to the food waste hierarchy in order for the policy to be able to deliver the best option for non-avoidable food loss and waste.

II. Recommendations considering the policy options envisaged in the Inception Impact Assessment:

- **Scope:** We strongly recommend choosing “*Option S1 – target covering the whole food supply chain, from farm gate to final consumer*”. The mandate given by the Farm to Fork strategy specifically is to holistically address food and agricultural challenges. Therefore, a coherent approach on food loss and waste has to go from farm to fork. [Pre-retail food waste is always underestimated and could represent 59% of the total EU food waste. At the farm level only, it is estimated that 150 million tonnes or 14.6% of the total food production is wasted.](#) Not including those stages would only lead to an inefficient policy missing the mark. Additionally, simply focusing on retail or consumers at the end of the food supply chain will lead to incomplete measures that won't address systemic drivers or causes of food wastage happening in earlier stages (overproduction, long transportation decreasing the products' shelf life, pre-fixed portion or size leading to over-purchasing...).
- **Expression:** We strongly recommend choosing “*Option E2 – targets expressed as absolute amounts, i.e. in kilograms per capita per year to be achieved by 2030 (per country)*”. Although we acknowledge the need for the EU to reach the 50% food waste reduction target across the supply chain by 2030, it should be reached through a kilograms per capita target that member states have to reach. Such a measure would only make the target fairer for countries which have already started reducing food loss and waste. For instance, the [FAO estimates that food waste in the retail sector in Denmark \(30 kilograms per capita per year\) is more than six times more important than in Slovenia \(4 kilograms per capita per year\)](#). Therefore, in the hypothetical case of an EU-wide target of 10 kilograms per capita per year to be reached by the retail sector, it only seems fair that Slovenia is rewarded for its already good results while Denmark will have to put extra efforts to reach the target.
- **The way the targets are set for Member States:** We strongly recommend choosing “*Option T3 – collective target on EU level – based on MS contributions*”. Related to the way the targets are expressed above, we believe that:
 1. Member states should reach the same kilograms per capita target...
 2. ... that will contribute to reaching a 50% reduction target by 2030.

In addition, the targets should also be fairly divided per sector of the food supply chain according to which sector is contributing the most. The mechanism should ensure that the most impactful sectors have the most effort to do so and to avoid [unfair trading practices](#).

- **Target to be reached:** We strongly recommend that the European Commission assess an option of **at least 50%**. It has been reiterated by the European Parliament that the 50% target to be reached by 2030 should be maintained while SDG goal 12.3 has been adopted in 2015. The fact that those targets will only be binding as of 2023 should not be an excuse to make them less ambitious. On the contrary, it should trigger more ambitions to reduce GHG emission by 55% by 2030.

In addition, please consider those additional files :

- [NGOs joint letter on the EC commitment on tackling food waste in the Farm to Fork Strategy](#)
- [Zero Waste Europe's Feedback on the Farm to Fork Strategy: towards a food system free of chemicals, overpackaging and waste](#)
- [Unwrapped: how throwaway plastic is failing to solve Europe's food waste problem and what we need to do instead](#)

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Zero Waste Europe is the European network of communities, local leaders, experts, and change agents working towards the elimination of waste in our society. We advocate for sustainable systems and the redesign of our relationship with resources, to accelerate a just transition towards zero waste for the benefit of people and the planet.



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