

To:

Commissioner Vytenis Andriukaitis

CC: Alexandra Nikolakopoulou, Head of Unit E1 of DG SANTE (DG SANTE's Unit for Food Information and Composition and Food Waste), Tim Gumbel Deputy Head of Unit E1 of (DG SANTE's Unit for Food Information and Composition and Food Waste)

Brussels, 22 November 2018

Subject: Joint letter on the EU delegated act on the measurement of food waste

We, the 22 undersigned, welcome the Commission's efforts to create and adopt a delegated act establishing a common methodology for food waste measurement. However, we believe that the current draft of this delegated act **will not allow a full and accurate measurement of the levels of food waste by the Member States** as requested in paragraph 3 and 4(a) of Article 9 of Directive (EU) 2018/851 amending Directive 2008/98/EC on waste.

Food waste constitutes a real ethical, economic and environmental issue in Europe and worldwide. In the EU, between 88 and 140 million tonnes of food waste are generated each year for a cost estimated at 143 billion euros (FAO, 2011, FUSIONS, 2016). Moreover, food waste generates about 8% of greenhouse emissions while 55 million EU citizens cannot afford a quality meal every other day (European Commission, 2017). In order to try to solve this critical issue, on May 2018, the European Institutions adopted Directive (EU) 2018/851 amending Directive 2008/98/EC on waste.

Directive (EU) 2018/851 is asking the Member States to take measures to reduce their food waste and to measure it annually from 2020 onwards. The directive also requires the Commission, in cooperation with the EU Platform on Food Losses and Food Waste, to adopt, by March 2019, a delegated act establishing a common methodology for the Member States to measure their levels of food waste (Directive (EU) 2018/851). We welcome this directive as it clearly represents a step forward to reducing food waste. Nevertheless, we believe that **the current draft of the delegated act on food waste measurement bears two important flaws** which will not permit an accurate measurement of food waste and will thus lessen EU efforts in reducing food waste.

Firstly, the methodology for food waste measurement established by the **current draft** of the delegated act **does not cover harvest food waste. Food wasted at the harvesting stage accounts for between 11% and 36% of the overall food waste in Europe** (FAO, 2011, FUSION, 2016). Therefore, we believe that it is essential to include harvest food waste in the methodology. Measurement will help reducing food waste but will also help EU farmers. Indeed, farmers are the ones currently bearing the cost and the burden of harvest food waste, which is often the result of Unfair Trading Practices and cosmetic outgrading by retailers.

Secondly, the **current draft does not require the Member states to report food waste separately by destination** and is **using an unclear food waste hierarchy**. Food waste have very different destinations with very different purposes going from food redistribution to compost production. Each of these destinations clearly do not bear the same value, thus, **it is of the utmost importance to incentivise progress to a better use of food waste**. In order to do so, Member States should be required to report food waste separately by destination using the food waste hierarchy recommended by the World Resources Institute (WRI) (WRI, 2017), which includes food going to animal feed and redistribution.

Therefore, we call on the European Commission to adopt the following changes to its delegated act on food waste measurement:

1. **Include harvest food waste** into the EU mandatory food waste measurement methodology.
2. **Incorporate the requirement for Member States to report their food waste separately by destination** using the food waste hierarchy recommended by the World Resources Institute.

For more details, we invite you to consult the Annex to this letter.

We would like to thank you for your time and consideration and would be glad to further discuss our position with you.

Best regards,

References:

- Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste. Consulted on <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32018L0851>
- European Commission (2017). Food Waste. Consulted on https://ec.europa.eu/food/safety/food_waste_en
- FAO (2011). *Global food losses and food waste – Extent, causes and prevention*. Consulted on <http://www.fao.org/docrep/014/mb060e/mb060e.pdf>
- FUSIONS (2016), *Estimates of European food waste levels*. Consulted on <http://www.eu-fusions.org/phocadownload/Publications/Estimates%20of%20European%20food%20waste%20levels.pdf>
- WRI (2017), *Guidance on Interpreting Sustainable Development Goal Target 12.3*. Consulted on <http://flwprotocol.org/wp-content/uploads/2017/08/Champions-12.3-Guidance-on-Interpreting-SDG-Target-12.3.pdf>

SIGNATORIES



**THIS IS
RUBBISH**



oikos



Deutsche Umwelthilfe



SIGNATORIES IN ALPHABETICAL ORDER

BirdLife Europe

Bond Better Leef voor de toekomst Milieu (BBL)

Deutsche Umwelthilfe e.V.

Disco Soupe

Ecologistas en Accion

Estonian Green Movement

European Environmental Bureau

FoodWin

France Nature Environnement

Freinds of the Earth Europe

Fruta Feia

Institute for Sustainable Development Slovenia

Oikos – Cooperação e Desenvolvimento

Olio

Pro Terra Foundation

SAFE-Safe Food Advocacy Europe

Sustain: The Alliance For Better Food and Farming

This Is Rubbish

VšĮ "Žiedinė ekonomika"

Zachran jidlo (Save Food)

ZERO – Associação Sistema Terrestre Sustentável

Zero waste Europe