

Brussels, 4 April 2019

Subject: Joint letter on the EU delegated act establishing a common methodology for food waste measurement

Dear Member States Representatives,

We, the undersigned, welcome the European Commission and Member States' 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** as requested in paragraph 3 and 4(a) of Article 9 of Directive (EU) 2018/851 amending Directive 2008/98/EC on waste.

As you might know the **current draft** of this delegated decision, which has been open for consultation, **does not include in-field food waste measurement, neither on a mandatory basis nor on a voluntary basis. Food wasted at the harvesting stage accounts for between 11% and 34% of the overall food waste in Europe** (FAO, 2011, FUSIONS, 2016). Therefore, we believe that it is essential to include harvest food waste in the methodology. Measurement will help reducing food waste, and thus, save valuable land and water resources, 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.

In light of both the environmental and economical costs harvest food waste represent, as well as the burden it imposes on farmers, **we believe that it is essential to include its measurement in the delegated decision, at least on a voluntary basis**. Therefore, we would like **to invite you to seize this opportunity and lead the way by requesting the Commission to include common guidelines for a voluntary measurement of harvest food waste in its delegated decision**.

In case the Commission refuses to include those guidelines, we would like to encourage your country to start including harvest food waste measurement in its statistics. Your country would thus set a positive example and create a momentum for the establishment of an EU wide response to this issue.

We believe that harvest food waste measurement would be immensely beneficial to your country's farmers community and environment and hope that you share this view. However, it seems that the Commission thinks that only a minority of Member States feel concerned by this issue. Thus, making the Commission aware of your country's interest for harvest food waste measurement would encourage it to provide those common guidelines.

We would like to thank you for your time and consideration and would be glad to discuss this topic further 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](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%20evels.pdf>

SIGNATORIES





## SIGNATORIES IN ALPHABETICAL ORDER

Bond Better Leef voor de toekomst Milieu (BBL)

Deutsche Umwelthilfe e.V.

Disco Soupe

Ecologistas en Accion

European Environmental Bureau

Feedback

Freinds of the Earth Europe

Fruta Feia

Oikos – Cooperação e Desenvolvimento

Olio

SAFE-Safe Food Advocacy Europe

Sustain: The Alliance For Better Food and Farming

This Is Rubbish

Zachran jidlo (Save Food)

ZERO – Associação Sistema Terrestre Sustentável

Zero waste Europe