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Feedback on the Roadmap concerning Food Waste Reduction Targets

Document addressed to the European Commission by SAFE – Safe Food Advocacy Europe ASBL

Safe Food Advocacy Europe – SAFE welcomes the inclusion of the setting of food waste reduction targets in the objectives of the European Green Deal and the Farm to Fork Strategy, and the efforts shown by the European Commission to allow interested stakeholders to express their comments on the proposal to revise the Directive 2008/98/EC on waste.

As highlighted by the Commission, **food loss and waste (FLW) reduction is pivotal to decreasing the EU food system's environmental and climate footprint and promoting a shift to healthy and sustainable diets**. In this respect, SAFE appreciates the commitment of the European Commission in **adopting legally binding targets** to ensure that Member States take ambitious actions to reduce food waste and would like to share its feedback on the proposed initiative.

In order to efficiently answer the call for feedback on the roadmap concerning Food Waste Reduction Targets, the present document will **further develop a number of important general considerations** regarding FLW policies, and will also **examine the reference baseline scenario** set by the European Commission for other policy options (in the areas of agriculture, climate, bioeconomy, food labelling or food waste, but also hygiene policies) in its Inception Impact Assessment.

A. General considerations

A **50% food loss and waste (FLW) reduction target by 2030**, as explicitly expressed in SDG 12.3¹ voted by all Member States of the United Nations in 2015, is a minimum for significant change to be achieved. The ongoing process of defining targets for FLW reduction (as called for in the EU Green Deal, and particularly in the Farm to Fork Strategy) should participate to

¹ [Champions 12.3. Sustainable Development Goals – 12.3 Global Food Waste & Losses \(FLW\)](#).

global objectives for food systems, shaping binding targets at the EU level and matching the Union’s ambition on sustainability and climate change.

For that matter, the European Parliament voted [a resolution on the Farm to Fork strategy](#)² on 19th October 2021, calling for a high level of ambition throughout the process of the revision of [the Waste Framework Directive \(Directive 2008/98/EC\)](#)³ adopted in 2018.

While setting legally binding targets and objectives is a crucial step towards more virtuous food systems, it is important to note that the very nature of policy actions defining the way food waste is addressed and tackled will deeply impact the capacity of the Union to significantly reduce – or not – its FLW levels.

In this light, we must stress that **voluntary commitments and consumers’ education/awareness-raising, while important, will not be an appropriate answer to the challenges ahead**. European food systems currently rely on production and disposal systems are unsustainable. To make sure that food consumption patterns contribute to a sustainable food systems transition and the success of EU political priorities on FLW reduction, it is important to understand how consumption patterns are established in wider food environments (ie. the *“physical, economic, political and socio cultural context in which consumers engage with the food system to make their decisions about acquiring, preparing and consuming food”*⁴). A “food environments” approach requires policy makers to look at what shapes consumers’ decisions to buy, eat and dispose of food – in other words, **the responsibility of tackling food waste should not be put on consumers’ shoulders alone, but instead on all actors shaping food systems** (from primary production to retail and wholesale). This can be achieved through financial incentives, taxes and binding measures for these actors.

For cases where FLW can incidentally not be avoided, the revision process of the aforementioned Waste Framework Directive should also include references to a food waste hierarchy, enabling decision-makers to favour the best possible option to dispose of FLW. In this regard, **measures to further facilitate food donation**⁵ are required to primarily focus on

² [European Parliament resolution \(2020/2260\(INI\)\) of 20 October 2021 on a farm to fork strategy for a fair, healthy and environmentally-friendly food system.](#)

³ [Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste.](#)

⁴ EU Food Policy Coalition (2021). [Food Environments & EU Food Policy – Discovering the role of food environments for sustainable food systems.](#)

⁵ SAFE (2020). [Food donation report.](#)

human consumption of food products. While useful, the use of former foodstuffs and by-products from the food chain in feed production should therefore be considered as a valorisation of waste and should consequently not be listed amongst the list of primary measures to reach FLW reduction targets.

B. Comments and Recommendations about the policy options envisaged in the EC Inception Impact Assessment

Step 1 – Scope, Measurement, Expression and Definition of Food Waste reduction targets

- **Scope: Reduction targets should cover the whole food supply chain, from farm gate to final consumer (S1).**

As recalled above, EU Member States have subscribed to SDG 12.3, which requires to "*halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses*" by 2030. **Such a target should be set across the whole food chain**, from the primary production phases to the distribution and sale phases (as described in Option S1 in the baseline scenario).

SAFE and other NGOs have regularly shared this very concern^{6,7}; the aforementioned European Parliament resolution on the Farm to Fork Strategy voted in October 2021 also supported the need to achieve a 50% reduction target "*by 2030 compared to the 2014 baseline; [it also underlined] that binding targets at every stage of the supply chain, including primary production, pre-retail and retail, are needed to achieve this*".

Reducing food waste at the primary production level, including unharvested food (*ie.* edible food that is mature and ready for harvest but wasted at the harvest stage by being ploughed back in or left to rot) is crucial to comprehensively address the systemic issue of food waste. Between 10% and 34% of EU food waste is wasted on farms – between 10 and 47 million tonnes annually – and the majority of this is harvest food waste⁸. The recent 'Driven to Waste' report⁹ moreover presents the most comprehensive data analysis on primary production of FLW to date, portraying an

⁶ [NGO Joint letter \(2020\) to Commissioner Kyriakides on the EC commitment to reduce Food Waste in the Farm to Fork Strategy](#).

⁷ This Is Rubbish (2017). [Statement on Food Waste in Waste Framework Directive](#).

⁸ SAFE, Feedback Global (2019). [Joint policy brief on EU food waste measurement methodology](#).

⁹ WWF (2021). ["Driven to waste: the global impact of food loss and waste on farms"](#).

alarming picture: about 150 million tonnes of food is wasted on European farms (14.6% of total production).

Consequently, SAFE believes that only the full involvement of the entire supply chain will make achieving the set targets possible, which will contribute to make the EU food system more sustainable and protect consumers' health.

- **Expression: Food waste reduction targets should be expressed in absolute amounts, in order to reach an overall 50% reduction target (E2)**

SAFE recommends opting for “*Option E2 - targets expressed as absolute amounts, i.e. in kilograms per capita per year to be achieved by 2030 (per country)*”. We however believe that concrete per capita amounts (based on the most comprehensive, accurate and recent data available) should always explicitly refer to the 50% FLW reduction target in order to focus on the EU objective to halve FLW by 2030.

- **The way targets are set for Member States: keeping the same target level for member states (T1) and defining a collective target at EU level (T3)**

It is crucial for all **EU Member States to have a target to reduce their FLW uniformly** (Option T1 in the baseline scenario), to be set at a level calculated to ensure an collective 50% FLW reduction at EU level by 2030 (Option T3). SAFE recalls that significant change cannot be achieved:

- ❖ Without **legally binding targets** for Member States;
- ❖ Without a **swift transcription of EU measures** into national legislations in order to meet the 2030 objectives;
- ❖ Without targets that would **be fairly divided amongst all sectors of the food supply chain**, with higher and stricter binding targets for sectors contributing the most to FLW production¹⁰.

Step 2 – Comparison of the expected environmental, economic and social costs and benefits of the baseline scenario

As expressed above, it is imperative that the Union keeps a high-level of ambition and does not water down the 50% FWL reduction target defined in SDG 12.3. For this reason, SAFE is calling on the European Commission to favour **Option 3 – to reduce food waste in the EU by 40-50%**.

¹⁰ EU Refresh (2017). [Systems maps and analytical framework. Mapping Food Waste drivers across the food supply chain.](#)

C. CONCLUSION

SAFE welcomes the Commission for launching a public consultation on the roadmap concerning food waste reduction targets. We believe that this initiative constitutes an important opportunity to radically change EU food systems in ways that will be both more respectful of our environment and of consumers' health and well-being.

Therefore, **we call on the European Commission to strive for the most ambitious targets and objectives** towards the 2030 horizon. In this regard, it is absolutely important that the ambitions of SDG 12.3 to halve FWL by 2030 are rapidly met at EU level – this will require increased commitments and actions from EU Member States who should be held accountable for their FWL production, fore their potential reluctance or lack of effective actions towards FWL reduction, and should on the other hand be politically rewarded for their efforts to shape sustainable food systems through incentives.