

Feedback on EC Proposal for a directive amending Directive 2008/98/EC on waste (the “Waste Framework Directive”) and the introduction of food waste reduction targets

This document is addressed to the European Commission by SAFE – Safe Food Advocacy Europe

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As acknowledged by [Eurostat in late 2022](#), in baseline year 2020, around 131 kilogrammes (kg) of food waste per inhabitant were generated in the EU, and this amount is likely to be underestimated¹. Therefore, at a time where food waste in the EU has reached records levels, SAFE welcomes the targeted revision of the Waste Framework Directive and the inclusion of new binding food waste reduction targets to be achieved by Member States by 2030.

Setting new legally binding targets for member states to reduce food waste represents a positive advancement. Nonetheless, SAFE urges EU policymakers to take this commitment further by instituting and achieving comprehensive food waste reduction goals of 50% throughout the entire supply chain, including primary production and thus extending beyond manufacturing, processing, retail, and consumer levels. Any other lower targets would prevent the EU from meeting its climate objectives (as described in the [Farm to Fork Strategy](#)) and fulfil international commitments (in particular, the Sustainable Development goal #12.3).

1. Need for ambitious targets, supported by comparable measurement methodologies

As still recently recalled in recent reports by the European Commission, “*food waste is a cross-cutting issue that needs to be addressed urgently to reduce the environmental and climate impacts of food systems and support the transition towards sustainable food systems*”. In this light, SAFE underlines that 10% in processing and manufacturing, and 30% at retail and consumption stages, as described in article 9a of the EC proposal, are too low to match the ambition (set by SDG 12.3) of halving food waste by 2030.

Furthermore, the proposed targets focusing on middle-chain actors and consumption stages risk putting more burden on consumers compared to manufacturing and processing. Despite households contributing to a 53 % share of total food waste according to Eurostat, a narrative in which cutting down food waste relies solely on a change in consumers behaviours falls short on a comprehensive understanding of the dynamics within food systems; approaching the issue with harmonised and ambitious targets would recognise that the most effective and equitable way to change food behaviours is to change the structural factors that drive food choices, i.e. food environments – and to holistically approach the problem by applying reduction targets at all stages of the food chain, from farm to fork.

¹ The [EU delegated decision on food waste measurement](#) currently states 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. On the contrary, Champions 12.3’s recommends that food waste measurement begins “*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*”. The exact share of waste on farms is difficult to precisely estimate as the scope of the measurement methodology within the Waste Framework Directive (WFD) does not cover “harvest food waste” - edible food that is mature and ready for harvest but wasted at the harvest stage by being ploughed back in or left to rot, and this is therefore not reported at primary production level. See [SAFE’s and Feedback’s joint policy brief on EU food waste measurement methodology](#), 2019.

Lastly, in order to ensure comparability between Member States' reduction levels, food waste measurement methodologies that each country uses should be evaluated scientifically, in order to limit biases in the application of the methodology and the reporting of measured food waste levels.

2. Include a target for primary production food waste

In addition, excluding primary production food waste from the targets means that no ambition is set in reducing a significant share of total food waste, thus missing the objective set by SDG 12.3. Champions 12.3, an international coalition of executives from governments, businesses, and civil society leading global food waste action, specifically recommends that all states should interpret SDG 12.3 target as a 50% reduction in all food loss and waste from farm to fork, including "food losses", ie. all food waste occurring before retail level (according to the FAO definition of food waste), not just food waste at the retail/consumer-level.

The SDG 12.3 Champions' published an interpretation of SDG 12.3 addressing the issue of discriminating between edible and inedible parts of food, as follows:

"What material types count?"

One should interpret that "food loss and waste" applies to both "food" that is intended for human consumption and its associated "inedible parts" which leave the human food supply chain because Target 12.3 comes under SDG 12 ("sustainable consumption and production") and not SDG 2 ("ending hunger"). It is thus about food security and resource-use efficiency, and not just about food security alone. This recommendation is consistent with the draft scope proposed for country-level data being suggested by FAO and the European Commission."

3. Ensure consistency with other legislative initiatives and include food waste reduction as part of the objectives of the Sustainable Food Systems legislative Framework

Finally, addressing both the environmental and social impacts of food waste require that systemic mechanisms driving overproduction (such as unnecessary marketing practices applying aesthetic standards for fruits and vegetables, eg.) are addressed by the legislation, taking a "food systems" approach that considers cascading effects of interventions/behaviours driving food waste generation along the food chain, as well as the balance of (economic) powers between food chain actors.

Ambitious targets should also be reflected in overarching existing and upcoming policies and legislative proposals, such as policies addressing food packaging or the Sustainable Food Systems legislative framework expected for Q3 2023.

4. Conclusions

SAFE therefore recommends policymakers to uphold the ambitions of SDG 12.3, the EU Green Deal and the Farm to Fork Strategy by:

- increasing all targets to 50%, covering the entire supply chain from farm to fork, as called for by civil society and the European Parliament;
- including ambitious target for the reduction of primary production food waste;
- considering setting prevention targets expressed in a maximum of "kg/capita" per year, as doing so would create a fairer unique baseline for all EU citizens regardless of the level of reduction already attained by Member States.