# POLICY BRIEF **EFFECTIVE GOVERNANCE FOR A JUST ZERO FOOD WASTE TRANSITION**



ZeroW tackles Food Loss and Waste (FLW) through a coordinated set of innovations piloted in nine real-world Systemic Innovation Living Labs (SILLs) aiming to achieve significant reductions across all stages of the food supply chain - from pre-harvest to consumption. A dedicated Policy Team complements this work by defining a 'Just Transition Pathway' toward near-zero FLW, offering a practical framework to bridge systemic barriers (e.g., fragmented and lengthy nature of the food supply chains, the digital divide, challenges in scaling innovative waste reduction technologies) and on-the-ground FLW solutions. Drawing on economic modelling and insights from the stakeholders and the SILLs, the team identified key recommendations promoting a flexible, equity-focused transition.

#### Introduction

Food Loss and Waste (FLW) challenge the sustainability and fairness of the EU food system, affecting environmental goals and economic resilience. Addressing FLW requires coordinated governance that balances incentives, accountability, and collaboration across diverse food system actors. This policy brief presents evidence-based recommendations to support inclusive, transparent, and effective governance frameworks aligned with the EU's Just Transition, which will guide the action plans of Member States for the newly adopted binding food waste reduction targets.

### **Policy Problem**

FLW amounts remain high due to the lack of a coherent governance framework that ensures transparency, accountability, and coordinated action across the food supply chain. Companies are not consistently required to measure or report FLW, and current policies offer limited incentives for prevention, data sharing, or collaboration. To meet the current EU food waste reduction targets in the context of a Just Transition, urgent action is needed to establish governance that mandates transparent reporting, rewards effective waste reduction, and supports inclusive, co-created solutions across the food supply chain (FSC).







### **Evidence from Project**

ZeroW project findings highlight that a non-punitive, incentive-based governance approach is both effective and widely supported across the food supply chain.<sup>1</sup> Roundtable discussions with FSC stakeholders emphasised that positive incentives, such as tax reductions or waivers for verified food waste reduction practices like redistribution, can drive voluntary corporate action, provided they are underpinned by mandatory FLW tracking to ensure transparency and fairness.<sup>2</sup> Additionally, a tiered FLW taxation system, adjusted according to business size, income level, or waste volume, was identified as a promising policy tool to ensure proportionate enforcement, while supporting equity across actors in the food system.

This progressive approach, as highlighted in the OECD's 2025 review of global FLW policy environments, can help tailor incentives and enforcement to different food system stages. Evidence from the project further reinforces the importance of horizontal peer-learning and data-sharing mechanisms, as demonstrated in its SILL7's food bank network where trust and collaboration were strengthened through inclusive and transparent practices. Similarly, SILL1's focus on developing a data hub strategy and semantic interoperability revealed critical barriers and enablers related to digital governance.

The pilots highlighted the importance of clear data ownership contracts, early adopter engagement, and building trust through accessible tools and fast-feedback applications. These insights underline the need for policy frameworks that support interoperable data infrastructure, address governance and trust concerns, and promote community-building around data sharing, all of which are essential to realising digitalisation's full potential for FLW reduction. These findings confirm that embedding accountability in public procurement and financial support mechanisms, through performance-based contracts, third-party verification, and tailored Small and Medium-sized Enterprises (SMEs) support, can accelerate FLW reduction while advancing a Just Transition that is inclusive, collaborative, and sustainable. Hence, these findings guide the following policy recommendations.





### **Key Policy Recommendations**

# 1. Establish a non-punitive, incentive-based approach to food waste governance

A non-punitive, incentive-based approach to food waste governance focuses on encouraging positive change rather than relying solely on penalties. Such strategies include promoting sustainable consumption, supporting eco-innovation, incentivising food donations, and raising awareness among producers, retailers, and consumers. By stimulating voluntary action, collaboration, and continuous improvement, these approaches foster a culture of responsibility and innovation across the food system.

An example of this balanced model is Spain's Law 1/2025 on the Prevention of Food Loss and Waste, which combines incentives with targeted enforcement. The law encourages the sale of "imperfect" but edible produce, requires food waste prevention plans, prioritises food donations, and mandates that restaurants provide free takeaway containers for leftovers. These non-punitive measures are designed to motivate all actors to reduce waste, while enforcement mechanisms ensure compliance when necessary. This integrated approach demonstrates how incentives and proportionate regulation can work together to accelerate progress toward national and EU food waste reduction goals.

Governments and public agencies play a crucial role in shaping market behaviour through procurement choices and financial support mechanisms. By linking corporate accountability for FLW to eligibility for public funding, subsidies, and procurement contracts, policymakers can create strong incentives for companies to prioritise sustainable practices.







Accountability in public procurement related to food waste reduction can be controversial due to concerns about increased administrative burdens and fairness. To address this, performance-based incentives offer a balanced solution by rewarding measurable achievements rather than imposing penalties alone. Examples include financial rewards, tax benefits, public recognition, and preferential contracting for suppliers who meet or exceed food waste reduction targets. This approach encourages innovation and collaboration, making accountability more acceptable and effective across the supply chain.

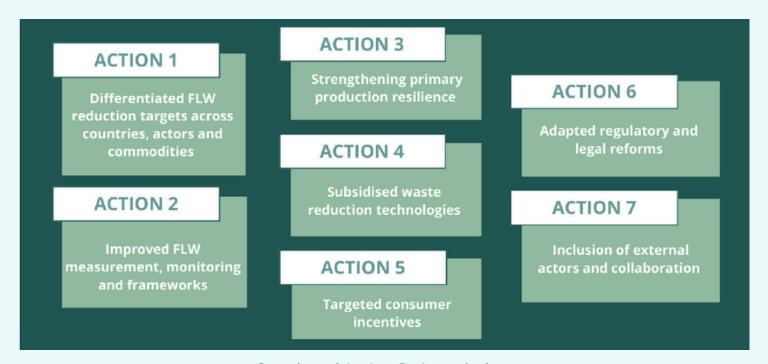
To operationalise this approach, companies applying for public contracts, grants, or subsidies should be required to demonstrate transparent and standardised reporting on their FLW. Reporting should align with internationally recognised frameworks, such as the FLW Standard by WRI or FAO guidelines, and be tailored to the size and operational scope of each company. This includes mandatory disclosure of waste reduction targets and measurable progress. Such a requirement would create a level playing field, ensuring that all applicants are held to consistent standards while encouraging meaningful efforts to reduce waste. It would also enhance public trust by ensuring that taxpayer-funded initiatives support sustainability goals and provide governments with reliable data to track progress towards national and international targets, including SDG 12.3 and therefore guiding the action plans of Member States for the newly adopted binding targets.

To support this shift toward performance-based accountability, a range of governance innovations and practical tools should be introduced. Performance-based contracts can link continued funding or contract renewals to FLW reduction benchmarks, while procurement scoring systems and bonus incentives can reward bidders with strong track records or ambitious targets. Effective enforcement requires regular audits and independent verification to ensure data accuracy, with proportionate penalties such as funding clawbacks or disqualification from future bids in cases of non-compliance. Oversight could be led by an independent body or existing public institutions, supported by third-party verifiers to maintain credibility. At the same time, tailored support for SMEs is critical to ensure inclusive participation.





As emphasised in ZeroW's SILL2 and the Just Pathway Action 4, this includes training programs, technical assistance, financial support for tracking technologies, simplified reporting templates, and phased implementation timelines. Innovation prizes and cost-sharing for certification can further encourage SMEs to engage in waste reduction efforts, ensuring that accountability measures are both ambitious and achievable across all business sizes.



Overview of the Just Pathway Actions

# 2. Increase accountability and transparency in digitalisation and public procurement

Digitalisation and sustainability are regarded as a "twin transition" in Europe: albeit having different starting points and goals, they can profoundly support each other, e.g. via digital solutions that can make sustainable decision-making easier, increasing digital skills in return. However, the adoption of digital solutions for sustainability in the food chain is not a binary yes/no decision. It is a journey comprised of different phases, from awareness to consideration and implementation. Inherently linked to increased digitalisation is the reliance on data, motivating all sorts of questions and insecurities around data governance that arise during this adoption journey. Policymakers can help make the journey smoother and more secure by implementing assurances around data governance and data ownership.





Policymakers can do this through the following approaches:

- Policymakers can communicate data governance policies, such as the EU Data Act (2024) and the EU code of conduct on agricultural data sharing by contractual agreement (2018), and ensure these are accessible to all intended audiences and can be well interpreted by them.
- Additionally, regulatory frameworks for the technology sector can help to ensure that owners and generators of data remain in control of their data.

Several uncertainties surrounding digitalisation require careful consideration from policymakers:

- Accountability: Clarify responsibilities regarding unintended outcomes from digital technologies, such as robotics, and address implications for existing labour agreements. Ongoing policy development should aim to manage such uncertainties clearly and effectively.
- Preservation of traditional knowledge: While promoting digital solutions to reduce FLW, policymakers should simultaneously encourage the documentation and retention of traditional knowledge, intuition, and practical experimentation. Balancing innovation with established practices ensures resilience and continued adaptation.
- Building trust: Effective policy implementation depends heavily on public trust.
   Trust levels vary based on historical and socio-cultural contexts; for example, communities in post-communist societies or rural areas distant from urban centres may exhibit lower trust in governmental initiatives. Policymakers must consistently demonstrate transparency and reliability through coherent communication and inclusive policies, particularly targeting enhanced engagement with rural farming communities.

# 3. Create EU-level guidelines for co-governance of Just Transition in the food system

The EU should develop concrete guidelines for co-governance that enable shared decision-making between public authorities and food system actors.







Evidence from ZeroW's stakeholder consultations and pathway simulations confirms that top-down enforcement or purely market-driven measures, such as flat-rate food waste taxes or voluntary innovation alone, often fail to address structural disparities and can lead to unintended spillovers, such as waste shifting across supply chain stages or penalising vulnerable groups like small farmers and informal retailers.

EU-level co-governance guidelines should promote inclusive collaboration between governments, farmers, processors, retailers, NGOs, and consumers, ensuring that FLW reduction targets are context-sensitive and co-developed. Local engagement is essential to tailor policy instruments, such as differentiated taxation, incentive schemes, and digital solutions, to the real operational capacities of different actors. Simulations from the MAGNET model show that FLW policies can produce both environmental gains and economic distortions, underscoring the need for more adaptive and collaborative governance frameworks.<sup>10</sup>

Drawing from ZeroW systemic lens, such guidelines should promote differentiated targets by sector, commodity, and actor capacity, while embedding circular economy principles that prioritise prevention over disposal. Public-private partnerships, community-level initiatives, and inclusive data-sharing standards, such as those piloted in ZeroW SILLs, demonstrate the feasibility of co-creating solutions that are both ambitious and implementable. The EU can lead by facilitating knowledge transfer, supporting governance innovation, and ensuring policy consistency across Member States, enabling a food system transformation that is fair, effective, and resilient.





### Conclusion

Achieving a resilient, sustainable, and equitable food system within the EU requires coordinated policy actions on multiple fronts. Firstly, establishing a non-punitive, incentive-based framework for food waste governance will encourage proactive participation from all stakeholders, fostering innovation and collective responsibility. Secondly, increasing accountability and transparency in digitalisation and public procurement is essential to build trust, mitigate risks, and ensure technologies genuinely benefit agricultural communities. Finally, developing comprehensive EU-level guidelines for co-governance will enable inclusive decision-making processes, ensuring that the transition to sustainability is both just and equitable. Together, these measures can underpin a robust and fair transformation of Europe's food system.

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