Health Care Without Harm
the campaign for environmentally responsible healthcare

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Health Care Without Harm Europe's Position Paper on the Circular Economy Package

Health Care Without Harm (HCWH) Europe is the European arm of a global not for profit NGO whose mission is to transform healthcare worldwide so that it reduces its environmental footprint, becomes a community anchor for sustainability, and a leader in the global movement for environmental health and justice. HCWH's vision is that healthcare mobilises its ethical, economic, and political influence to create an ecologically sustainable, equitable, and healthy world.

HCWH Europe supports the European Commission's (EC) proposal for a Circular Economy Package to increase recycling of municipal waste, to extend waste minimisation targets to all stages of the supply chain, and to focus on food waste prevention. However, HCWH Europe is concerned about the limited consideration given to the issue of food waste in the Circular Economy Package. Food waste is a global problem that impacts the environment, the economy, and society as a whole. Food waste accounts for large amounts of greenhouse gas (GHG) emissions through the extensive exploitation of natural resources such as land, water, energy, and fuels that are required for food production and distribution.

A study from the Food and Agriculture Organisation of the United Nations (FAO), published in 2013 estimates that each year, one-third of all the food produced in the world for human consumption never reaches consumers' tables. This same study estimates the global food-waste footprint to be around 4.4 Gt CO2eq per year.[1] Consequently, the food industry is a major contributor to climate change, which causes major harm to both humans and the environment. In addition to the adverse health impacts of food production, vast amounts of time and money are also invested in the production of food: according to a 2013 FAO report, in 2007 the direct economic cost of global food waste of agricultural products (excluding fish and seafood), was approximately $750 billion USD, the equivalent to the GDP of Switzerland.[2] When food is wasted at any stage of the supply chain, all of the resources and efforts invested are also wasted.

To reduce this avoidable misuse of resources, which is having negative impacts on human and environmental health, HCWH Europe calls for more stringent waste and food waste legislation, by incorporating the following suggestion into the Directive proposal (COM(2015) 595 final), for amending Directive 2008/98/EC on waste .

1. Eliminate the term "quantity" in the definition of municipal waste and clarify the term "other sources"

The term "quantity", which appears in the Commission's definition of municipal waste, should be removed so that waste from institutions that produce large quantities of waste, like health systems, will be clearly considered and regulated under the municipal waste definition, which is not currently the case. The current municipal waste definition in Article 3, point 1 of the proposal for a Directive (COM(2015) 595 final) amending the Directive 2008/98/EC on waste, defines municipal waste as:

> *"Mixed waste and separately collected waste from other sources that is comparable to household waste in nature, composition and quantity."*

This definition covers waste that comes from households and "*other sources* that are similar in nature, composition and quantity".[3]

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[1] FAO (2014), Food wastage footprint & Climate Change. http://www.fao.org/3/a-bb144e.pdf

[2] FAO (2013) Food wastage footprint impacts on natural resources, Summary Report. http://www.fao.org/docrep/018/i3347e/i3347e.pdf

[3] European Commission,. *Waste Framework Directive*. Directive 2008/98/EC on waste (COM(2015) 595 final)

HCWH Europe is concerned that without specifying what "*other sources"* refers to, there will be a lack of clarity that could lead to having large producers of municipal waste (such as the healthcare sector), fall out of this definition.

Eurostat states that: "the bulk of the [municipal] waste stream originates from households, though *similar wastes* from sources such as commerce, offices, public institutions, and selected municipal services are also included".[4] Eurostat identifies "similar wastes" as "household and other services", which includes waste from activities such as wholesale, retail, transport, communications, financial services, administration, defence, education, and health.[5] These services account for a large proportion of a city's municipal solid waste and these sources should be clearly identified in the definition of municipal waste, so they are collected and treated in the same way as household municipal waste.

In addition, there is lack of data on the exact amount of waste generated by each sector. Specifying where municipal waste comes from would require the compilation of reliable data on the waste produced by these sectors and consequently facilitating better regulation. Therefore, HCWH Europe calls for a clarification of which sectors fall under "other sources."

2. Create a definition for "food waste"

Currently, there is no official definition of the term 'food waste', for the purpose of the revision of Directive 2008/98/EC, a harmonised definition of 'food waste' should be included. In order to guarantee the effective management and regulation of food waste in the European Union (EU), the term itself must be defined. HCWH Europe proposes the adoption of the definition developed by the EC's FUSIONS project, which states:

> *"Food waste is any food, and inedible parts of food, removed from the food supply chain to be recovered or disposed (including composed, crops ploughed in/not harvested, anaerobic digestion, bio-energy production, co-generation, incineration, disposal to sewer, landfill, or discarded to sea)".*[6]

HCWH Europe supports this definition as it addresses both edible and inedible foods, at all stages of the food supply chain (production, post-harvest, processing and manufacturing, retail/wholesale, food service/catering, and household consumption).[7]

According to a recent UNEP study[8], over half of the food produced today is lost, wasted, or discarded as a result of inefficiencies in the human-managed food chain. It is crucial that any definition of food waste addresses all levels of the food supply chain (from primary production to consumption), in order to fully address the range of issues that can arise.

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[4] Ec.europa.eu. (2016). *Municipal waste - Eurostat*. http://ec.europa.eu/eurostat/web/waste/transboundary-waste-shipments/key-waste-streams/municipal-waste

[5] Ec.europa.eu. (2016). *Services - Eurostat*. http://ec.europa.eu/eurostat/web/waste/waste-generation-and-management/generation/services

[6] Gheoldus, M. (2016). *FOOD WASTE DEFINITION*. Eu-fusions.org. http://www.eu-fusions.org

[7] Bio Intelligence Service, Umweltbundesamt, AEA, (2010). *Final Report – Preparatory Study on Food Waste*. Technical Report 2010 - 054. European Commission [DG ENV - Directorate C].

[8] Nellemann, C., MacDevette, M., Manders, T., Eickhout, B., Svihus, B., Prins, A. G., Kaltenborn, B. P. (Eds). February 2009. The environmental food crisis – The environment's role in averting future food crises. A UNEP rapid response assessment. United Nations Environment Programme, GRID-Arendal, www.grida.no

Food waste can occur due to problems with machinery and infrastructure (such as cooling, storage, and transportation systems), which can be caused by a number of reasons such as poorly implemented or non-existent policies and regulations, or social and economic factors such as consumer behaviour. Legislative barriers on food quality and appearance, and the leniency or strictness of trade agreements also massively contribute to food waste globally.

However, according to the FUSIONS project, there is still lack of data and regulation surrounding food waste during primary production.[9] To address all of these issues, and to improve regulation regarding food waste, it is crucial that a definition of the term that addresses the entire supply chain is developed and included in the Directive proposal (COM(2015) 595 final).

3. Introduce an EU food waste reduction target of at least 50% across the entire supply chain

In accordance with Sustainable Development Goal (SDG) 12.3[10], HCWH Europe suggests the inclusion of a food waste reduction target of 50% by 2030 in Article 9, Paragraph 1.5. A baseline year or time frame should be defined so as to measure progress and properly evaluate compliance with the target in all Member States.

HCWH Europe is calling for a baseline year of 2014 to be included in this target, the same year the preliminary assessment was carried out by the Open Working Group (OWG) on the SDGs, and a set of targets was introduced for each SDG, on the basis of available data. 169 targets were created for the 17 SDGs, one of these being the 50% food waste reduction target, which is a component of SDG 12.3.[11]

HCWH Europe encourages Member States and individual sectors to set goals to achieve a reduction in food waste through national activities. More effort should be made at a national level to reach this 50% target and setting this target in this amendment to the current EC proposal could be a way to encourage such efforts. The United Kingdom and The Netherlands have already set food waste reduction targets. The Courtauld Commitment in United Kingdom set a 20% reduction target in food and drink waste from manufacturing and retail by 2025,[12] and the Dutch government proposed a 20% reduction in food waste by 2015 [13], which has not been achieved yet. For these reasons, HCWH Europe calls for a legally binding EU food waste reduction target to be included in the Directive proposal (COM(2015) 595 final).

[9] Estimates of European food waste levels. (2016). Stockholm: FUSIONS. http://www.eu-fusions.org/
[10] Sustainable Development Knowledge Platform (2016). www.sustainabledevelopment.un.org/sdg12
[11] Sustainable Development Solutions Network, (2015). *Indicators and a Monitoring Framework for the Sustainable Development Goals*. Revised working draft (Version 7). Sustainable Development Solutions Network. http://unsdsn.org/
[12] Wrap.org.uk. (2016). *The Courtauld Commitment 2025 to transform UK food and drink | WRAP UK*. http://www.wrap.org.uk/content/courtauld-commitment-2025-transform-uk-food-and-drink
[13] Government.nl. (2016). *Wasted food | Food | Government.nl*. https://www.government.nl/topics/food/contents/wasted-food

4. Establish a food waste hierarchy

In addition to the general waste hierarchy in Article 4 paragraph 1 of Directive 2008/98/EC on waste, a food waste hierarchy specific to food should be included in Directive proposal (COM(2015) 595 final). The current waste hierarchy is a crucial element of waste legislation that sets priorities for waste prevention and management. However, food waste should be prioritised differently, allowing for more potential for the effective management of food waste. For example, there are particular recovery processes that can only be applied to food, such as food donation to charities and social organisations, or using food waste for animal feed or composting. HCWH Europe is calling for a comprehensive food waste hierarchy that identifies the different processes of food waste disposal. Specifically, HCWH Europe proposes the following hierarchy:

a) Source prevention
b) Edible food rescue, prioritising human over animal feed or biochemical reprocessing
c) Residential composting and/or conversion into other products
d) Centralised composting or anaerobic digestion
e) Mechanical biological mixed waste treatment

HCWH Europe believes that this structure would provide a comprehensive set of actions for extending the lifespan of food items. HCWH Europe recognises this particular structure to be ambitious as it excludes the final stage of the general waste hierarchy - landfill/incineration. The elimination of this stage is a bold call, as it implies a total elimination of food going to landfill. HCWH Europe feels that eliminating this step in the food waste hierarchy is an important move towards more ambitious and more sustainable management of food waste. This would establish food waste as a valuable resource that can be exploited to serve many different productive purposes and processes. This would lead to the eventual reduction in landfill waste, and toxic burning of waste through incineration.

5. Establish a common methodology for the measurement of food waste in all Member States

HCWH Europe is calling for the development of a methodology and a set of indicators capable of assessing and comparing food waste reductions achieved by the different Member States. This methodology should consider efforts carried out by national and local authorities, as well as all sectors involved in different stages of the food supply chain. Both qualitative and quantitative indicators are needed for a reliable methodology. Having quantitative indicators is crucial in order to quantify the progress made, as well as to evaluate what food waste reduction means in economic/cost terms. In addition, it is important to define a timeframe for the adoption of such methodology; HCWH Europe proposes an 18-month timeframe from when the amended Waste Framework Directive enters into force rather than a specific date for the establishment of the methodology, which may be subject to change according to the political process and potential delays.

HCWH Europe also calls for a methodology that clearly defines what is being measured. As part of the food waste measurement methodology, it is important that “food waste” is defined, so that the scope of the methodology can be specified. Without a clear definition, there is a risk that the methodology will be unreliable and fail to reach its full potential. The FUSIONS project has conducted research into the levels of food waste throughout the entire production and supply chain in the 28 EU countries. The data obtained demonstrates there is a vast lack of data on food waste across the supply chain, and only approximately one quarter of Member States were able to provide high-quality data. Nevertheless, this study is the most comprehensive estimate regarding the levels of food waste in the EU, and the gap in reliable data about food waste and food waste reduction in the EU shows that there is an urgent need to develop a common methodology.

Concluding remarks

HCWH Europe supports a circular economy in Europe and, as part of this, the reduction of food waste. The minimisation of waste in food and catering services is a challenge directly affecting European hospitals, where up to 30% of the food served is wasted, according to some studies. [14,15,16,17,18] Food waste in hospitals is caused by, among other things, unnecessarily large portion sizes and inefficient ordering systems that fail to harmonise the number of patients with the number of meals served. Additionally, most healthcare facilities in Europe rarely separate waste, and there are very few composting and recycling initiatives; HCWH Europe believes that food waste prevention and management should be made a priority in healthcare facilities, whilst ensuring that patients' nutritional requirements are met.

The healthcare sector (hospitals in particular), has the opportunity - and in line with the Hippocratic Oath; 'First do no Harm: the moral obligation to inspire and guide other sectors at a local, regional, and national level in the proper management of food waste. Reducing food waste saves money, and helps the healthcare sector to reduce its environmental and health impacts.

HCWH Europe calls on the European Parliament to consider HCWH Europe's suggestions in the debate on the Circular Economy Package, paving the way for Member States to work together towards achieving Sustainable Development Goal 12.3 (effectively halving food waste by 2030). Thus helping to protect human and environmental health as well as halting the exploitation of natural resources.

[14] Williams, P., & Walton, K. (2011). Plate waste in hospitals and strategies for change. E-SPEN, the European E-Journal of Clinical Nutrition and Metabolism, 6(6), e235–e241. http://doi.org/10.1016/j.eclnm.2011.09.006
[15] Barton, A. D., Beigg, C. L., Macdonald, I. A., & Allison, S. P. (2000). High food wastage and low nutritional intakes in hospital patients. Clinical Nutrition (Edinburgh, Scotland), 19(6), 445–9. http://doi.org/10.1054/clnu.2000.0150
[16] Sonnino, R., & McWilliam, S. (2011). Food waste, catering practices and public procurement: A case study of hospital food systems in Wales. Food Policy, 36(6), 823–829. http://doi.org/10.1016/j.foodpol.2011.09.003
[17] Dias-Ferreira, C., Santos, T., & Oliveira, V. (2015). Hospital food waste and environmental and economic indicators - A Portuguese case study. Waste Management (New York, N.Y.), 46, 146–54. http://doi.org/10.1016/j.wasman.2015.09.025
[18] Ofei, K. T. (2015). Food waste in hospital: Minimizing without compromising patient food intake using the DIMS. Aalborg University. Retrieved from http://vbn.aau.dk/files/223354456/Kwabena_Titi_Ofei_E_pdf.pdf