



Food waste in the Circular Economy Package

A HCWH Europe position paper

Waste/Resources

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Introduction

HCWH Europe supports the European Commission's (EC) proposal for a Circular Economy Package to increase recycling of municipal waste, extend waste minimisation targets to all stages of the supply chain, and focus on food waste prevention. However, HCWH Europe is concerned about the limited consideration given to 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 Organization of the United Nations (FAO) published in 2013 estimates that each year one third of all food produced globally for human consumption never reaches consumers' tables. This same study estimates the global food-waste footprint to be approximately 4.4 Gt CO₂eq (gigatonnes of CO₂ equivalent) 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 2014 FAO report, the economic cost of global food wastage amounts to \$1 trillion USD each year - not including environmental and social costs caused by food waste, such as the consequences of soil erosion due to intensive farming, or the adverse health effects due to pesticide exposure, for example.² When food is wasted at any stage of the supply chain, all of the invested resources and efforts are also wasted.

Recommendations

To reduce this avoidable misuse of resources, which negatively impacts on human and environmental health through intense contribution to the exacerbation of climate change, HCWH Europe calls for more stringent waste legislation including food waste provisions, by incorporating the following amendments into the Directive proposal (COM(2015) 595 final) for amending Waste Framework Directive (WFD) 2008/98/EC.

1. Establish a legally binding definition for “food waste”

Currently, there is no common definition of “food waste” in the European Union, thus forcing Member States to work with different national definitions and, as a consequence, different methodologies to prevent and reduce food waste. A recent report published by the European Court of Auditors³ highlights this major gap in food waste legislation and states that the lack of a European definition majorly contributes to the lack of coherent food waste data available across the EU.

To tackle an issue it must first be defined; therefore the success and efficiency of any measures to address the problem of food waste in Europe will require that a harmonised definition of ‘food waste’ is included into the revision of Directive 2008/98/EC.

HCWH Europe supports the definition proposed by the European Parliament as it addresses both edible and inedible food, however, the exclusion of primary production losses is regrettable.

“‘Food waste’ means food intended for human consumption, either in edible or inedible status, removed from the production or supply chain to be discarded, including at primary production, processing, manufacturing, transportation, storage, retail, and consumer levels, with the exception of primary production losses.”

According to a recent UNEP study⁴, over half of 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 contribute to food being avoidably wasted.

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.⁵

According to the European Commission’s FUSIONS project⁶ and the European Court of Auditors⁷, there is a vast lack of data and regulation surrounding food wasted at primary production. HCWH Europe is concerned that the European Parliament’s proposed definition will not address the great amount of food wasted at the primary production stage. More concerning than the exclusion of “primary production losses” from the EP’s food waste definition, however, is the failure to define what is meant by “primary production losses” in any European legislation. The UN Food and Agriculture Organization⁸, and the EU Platform on Food Losses and Food Waste⁹ have made a clear distinction between food loss and food waste, however, this distinction is not reflected in European legislation. For the sake of clarity and coherence, clear and legally binding European wide definitions for both terms are needed.

2. Introduce an EU food waste reduction target of at least 50% by 2030 across the entire supply chain

In accordance with Sustainable Development Goal (SDG) 12.3¹⁰, HCWH Europe supports the EP’s call for the inclusion of a food waste reduction target of 50% by 2030 (article 9, Paragraph 1.5). While HCWH Europe believes this target should be legally binding in order to meet SDG 12.3, at the very least the EU must include the proposed voluntary target into the next revision of the Waste Framework Directive 2008/98/EC in order to stimulate Member States (MS) to implement measures for significantly reducing food waste.

The current capacity and efficiency of food waste management systems is extremely varied across the 28 Member States; the disparity of their capacity to manage food waste is one of the main complexities surrounding the establishment of European food waste legislation. Yet in order to narrow the gap between MS’s food waste experiences, the EU must be a leader by implementing legislative measure that will guide Member States with weaker food waste regulation to take the first steps, and to implement national food waste reduction policies and infrastructure.

HCWH Europe strongly believes that the current revision of the WFD 2008/98/EC is a unique opportunity to implement the legislative framework that will lay the foundation for achieving significant EU wide food waste reduction in the future.

HCWH Europe encourages Member States and individual sectors to set goals to achieve a reduction in food waste through national activities; The United Kingdom and The Netherlands have already set food waste reduction targets for example. The Courtauld Commitment in United Kingdom set a 20% reduction target in food and drink waste from manufacturing and retail by 2025,¹¹ and the Dutch government proposed a 20% reduction in food waste by 2015.¹² While these voluntary targets have not been reached yet, there has been impressive progress in research¹³, innovation, and campaigns¹⁴ that are actively working to reduce and prevent food waste nationally, by sector,¹⁵ and within local communities. Setting a national target to reduce food waste is not only crucial to motivate action, but to also raise public awareness amongst businesses, supply chains, and households to help encourage behaviour change, and food waste reduction at all levels.

3. Establish a food waste hierarchy

HCWH Europe supports the EP in its call to introduce a specific food waste hierarchy, in addition to the general waste hierarchy into Article 4 paragraph 1 of Directive 2008/98/EC on waste. 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 effective management of food waste. There are particular recovery processes that can only be applied to food, such as food donation to charities and social organisations, and 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, and for this we supports the EP's proposed hierarchy:

- Source prevention
- Edible food rescue, prioritising human use over animal feed, and the reprocessing into non-food products
- Organic recycling
- Energy recovery
- Disposal

4. Establish a common methodology for the measurement and prevention 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 support actors in identifying and implementing appropriate actions to take at national, regional, and local level to not only measure but also prevent food waste.¹⁶ The 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; quantitative indicators are crucial to quantify the progress made, as well as to evaluate what food waste reduction means in economic terms.

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, where less than one quarter of Member States were able to provide high quality data, and only for some stages of the supply chain. 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 shows that there is an urgent need to develop a common methodology.

5. Set up guidelines for food waste prevention and management

All the points mentioned above are essential tools that will work together to pave the way for a harmonised food waste management framework for Europe. Member States, however, will require assistance in the implementation of these tools. HCWH Europe calls on the European Commission to develop a series of guidelines for food waste prevention (such as the ones being developed for food donation)¹⁷, as well as guidelines for implementing the revised Waste Framework Directive and the food waste provisions that we hope will be present in the final adopted legislative text.

Concluding remarks

HCWH Europe supports a circular economy in Europe including 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.^{18,19,20,21,22} 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 meals served to the number of patients. 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 to: 'First do no Harm', the moral obligation to inspire and guide other sectors at a local, regional, and national levels in the proper management of food waste. Reducing food waste helps the healthcare sector reduce its environmental and health impacts and at the same time saves money.

HCWH Europe calls on the European Council 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; helping to protect human and environmental health, save money, and halt the exploitation of natural resources.

These calls are supported by 51 organisations, in [this joint NGO statement](#).

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