NO TIME TO WASTE

Why the EU needs to adopt ambitious legally binding food waste reduction targets

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CONTENTS

KEY TAKEAWAYS 4

INTRODUCTION 6

THE EU FOOD WASTE REDUCTION TARGET SHOULD LEGALLY REQUIRE A 50% REDUCTION BY 2030 10

THE EU FOOD WASTE REDUCTION TARGET SHOULD BE FARM TO FORK 14

WHY A 50% BY 2030, FARM-TO-FORK TARGET IS AMBITIOUS, BUT ACHIEVABLE 20

RECOMMENDATIONS 27

CONCLUSION 30

ANNEX 31

BIBLIOGRAPHY 32

KEY TAKEAWAYS

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Reducing food loss and waste is one of the most important actions we can take to fight the climate crisis and improve the resilience of our food system. The IPCC Special Report on Climate Change and Land highlights that, from 2010–2016, global food loss and waste equalled 8–10% of global GHG emissions and cost the world about USD 1 trillion per year[1]. Food waste is a global challenge that presents a significant environmental, social, and economic burden to all countries and regions, including the EU.

As one of the world's largest emitters, the EU's food waste accounts for at least 6% of its total emissions and costs the EU upwards of €143 billion per year[2]. With the EU's food system reverberating from the Russian invasion of Ukraine, it is worth considering that, in 2021, the EU imported almost 138 million tonnes of agricultural products from outside of its borders, worth a total of €150 billion, while wasting a higher amount — 153.5 million tonnes — of food each year[3]. The scale of waste is all the more concerning when one considers that, across the block, 33 million people cannot afford a quality meal every second day[4]. Food insecurity and climate change disproportionately impact women and historically marginalised communities, making food waste a human rights and gender equality issue[5,6].

Seven years ago, the European Commission signed up to Sustainable Development Goal (SDG) 12.3 to halve food waste by 2030, but the EU is nowhere near on track to meet this goal. The European Parliament called for the EU to set targets to halve food waste in 2012, and again for them to introduce legally binding 50% farm-to-fork targets in 2017. In recognition of its commitment to SDG 12.3 and the accelerating impacts of the climate crisis, momentum to reduce food waste in the EU is building. In 2018, the European Commission adopted the amended Waste Framework Directive (WFD), which binds EU member states to begin measuring and reporting their food waste from 2020 onwards. The Commission is currently developing proposals for legally binding food waste targets for EU member states, including critical decisions about their ambition (with options ranging from 20% to 50% by 2030) and their scope (retail and consumer level only, or from farm to fork). This presents a remarkable opportunity for the EU to act decisively and ambitiously on food waste, particularly at a time when the global food system is revealing its fragility[7].

We urge the European Commission to set a legally binding target of a 50%, farm-to-fork reduction in food waste by 2030 and recommend that policymakers, organisations, and individuals join us in calling for these targets to be adopted. As reflected in this report, a 50% by 2030, farm-to-fork target has widespread support from businesses, civil society organisations, and policymakers across the EU. This report demonstrates why a 50% by 2030, farm-to-fork target is necessary and provides recommendations for the EU and Member States, including which policies and approaches will make achieving the 50% target feasible and how this should inform impact assessment modelling.

THE EU FOOD WASTE REDUCTION TARGET MUST LEGALLY REQUIRE A 50% REDUCTION BY 2030

In 2015, the EU agreed to reduce food waste by 50% by 2030 when it agreed to SDG 12.3. A legally binding target will formalise this commitment into law and accelerate Member States' action to meet it. It will also allow the EU to meet its domestic and international climate commitments; support food security; align with gender equality goals; promote climate justice; and save money for governments, businesses, and households.

THE EU FOOD WASTE REDUCTION TARGET MUST BE FARM TO FORK

Food loss and waste in the primary production, processing, and food service sectors is substantial. If primary production and processing were to be excluded from a food waste target, this would exclude up to 33% of total food loss and waste in the EU[2]. Excluding food service as well would mean that the target would exclude at least 48% of total food loss and waste.[a] For comprehensive coverage, it is therefore essential that any target include food loss and waste across the whole supply chain, not just the retail and consumer sectors.

Excluding primary production, processing, and the food service sector would also create perverse incentives for member states and companies to achieve reductions in food waste by pushing risks and costs of food waste onto farmers and manufacturers, which in turn increases the risk of Unfair Trading Practices (UTPs).

A 50% BY 2030, FARM-TO-FORK FOOD WASTE REDUCTION TARGET CAN BE ACHIEVED THROUGH TARGETED, AMBITIOUS ACTION

- Regulation to reduce food waste has been on the EU's agenda for over a decade, but delays in measurement and reduction targets have slowed the pace of action. Member States are now well-equipped with baseline figures from mandatory food waste measurement. Once a target is set, Member States will be able to achieve progress towards it much more quickly than we have seen in the past, particularly if the EU provides additional support. Evidence from industry frontrunners show the necessary rate of food waste reduction is possible.

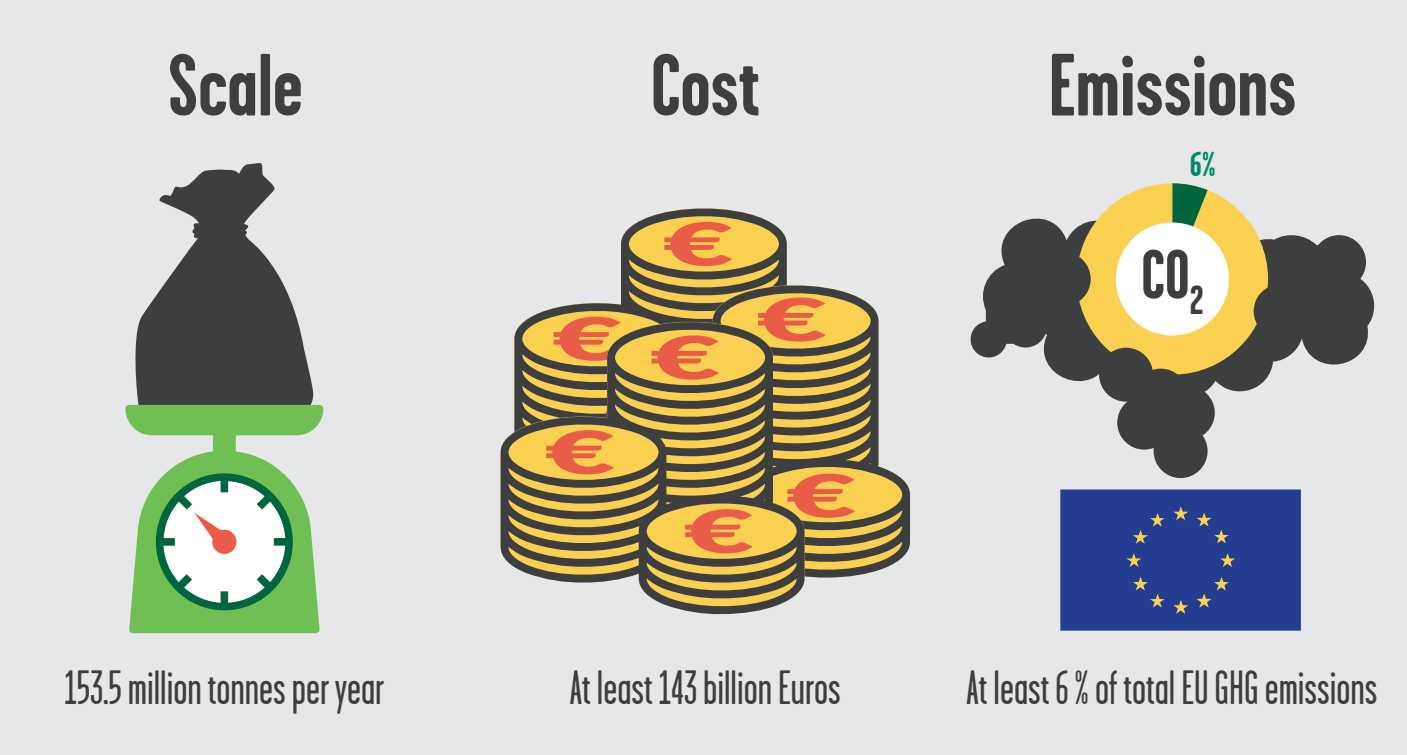
- Until now, action against food waste has largely relied on voluntary agreements, which have seen some successes but have serious limits. Evidence from other sectors shows that regulation can yield far faster progress than voluntary measures. It is vital that the EU consider the impact of introducing regulation when modelling the feasibility of achieving a 50% by 2030 reduction target.

a These figures are based on the UN Food Waste Index and the world's most comprehensive meta-study on primary production food loss and waste from WWF, which are the two most up-to-date and robust sources of data on EU food waste levels in the primary production, food service, retail, and household sectors.

INTRODUCTION

Reducing food loss and waste[b] is one of the most important actions we can take to fight the climate crisis. Food waste has untenable environmental, economic, and social costs. Globally, it accounts for 8–10% of all human-generated greenhouse gas (GHG) emissions and costs the world more than USD1 trillion in economic losses per year[8,9]. The scale of global food waste is so vast that one often turns to analogies to describe it: that if food waste were a country, it would be the world's third-largest GHG emitter[10]; that the amount of land used worldwide to grow wasted food is larger than the surface area of India and Canada combined[10]; that the annual global blue water footprint of food waste is about 3.6 times the blue water footprint of total US consumption[10].

Figure 1: Scale and cost of food waste



Credit: Feedback, 2022.

The level of the EU's food waste is approximately 153.5 million tonnes per year (see 'Data sources' for a breakdown of how we calculated this estimate). This accounts for at least 6% of the EU's total GHG emissions.[2] It is time for the EU to take targeted and ambitious action to reduce its food waste levels. Introducing regulation on food waste has been on the EU's agenda for over a decade but has long been delayed (see Box 1).

b Research has shown the oft-made distinction between food "loss" (as something that occurs inadvertently in production and post-harvest due to factors beyond human control, usually in developing countries) and food "waste" (as something that occurs only at the retailer/consumer level, usually in developed countries) to be false (see 'Food loss and waste in primary production and processing'). Therefore, any use of the term food "waste" in this report refers to food waste that takes in any sector of the supply chain, including in primary production.

BOX 1: CHRONOLOGY OF EU (IN)ACTION ON FOOD WASTE

- In 2010, the Commission commissioned a review of food waste reduction initiatives, concluding that efforts should concentrate on "the creation of specific food waste prevention targets for Member States"[11].
- In 2012, the European Parliament called on the Commission to "to take practical measures towards halving food waste by 2025" including "specific food waste prevention targets for Member States"[12].
- The Commission proposed a Circular Economy Package in 2014 and then withdrew it, only to propose it again in less ambitious form.
- In 2016, the EU Court of Auditors heavily criticised the Commission for insufficient progress on food waste goals[13].
- In 2017, the European Parliament again called on Member States to "take the measures required to achieve a Union food waste reduction target of 30% by 2025 and 50% by 2030 compared to the 2014 baseline", covering "the whole supply chain, including in primary production, transportation, and storage" and for a review of "binding Union-wide" targets by December 2020[14]. These ambitious proposals by the Parliament were significantly diluted and delayed following trialogue negotiations with the Council and Commission.
- In 2018, the European Commission adopted the amended Waste Framework Directive (WFD), which requires Member States to begin measuring and reporting their food waste from 2020 onwards, in accordance with the methodology laid out in a delegated decision in 2019. However, the directive delayed a review of food waste reduction targets until 2023.

Building on a commitment in the WFD, the EU's subsequent Farm to Fork strategy said, "Using the new methodology for measuring food waste and the data expected from Member States in 2022, [the Commission] will set a baseline and propose legally binding targets to reduce food waste across the EU". The initiative to create EU food waste reduction targets is part of the EU's Farm to Fork Strategy (which, in turn, is part of the European Green Deal), which is "aiming to make food systems fair, healthy and environmentally friendly". The Commission will make an initial proposal informed by an impact assessment and consultations, and then the final target will be agreed by the European Parliament, Council, and Commission. The targets would be introduced through a revision of the Waste Framework Directive.

The EU is now in the process of making key decisions about the target, including its ambition (with options ranging from 20% to 50% by 2030) and its scope (retail and consumer level only, or from farm to fork). In this report, we demonstrate why it is vital for the EU to adopt a legally binding target of a 50% reduction in food waste from farm to fork by 2030.

- **Why 50% by 2030?** In 2015, the EU agreed to reduce food waste by 50% by 2030 when it agreed to SDG 12.3. A legally binding target will formalise this commitment into law and accelerate Member States' action to meet it, as well as help the EU and Member States to meet other international climate commitments; reduce GHG emissions; support food security and climate justice (in turn improving gender equality); and save money.

- **Why farm to fork?** Given the scale of waste in the EU's farming, manufacturing, and processing sectors (see Box 1 on defining sectors in the supply chain), it is imperative that this 50% target cover the whole supply chain.

- **How is this achievable?** The target will level the playing field for all Member States and require the EU to provide Member States with support for food waste reduction action. Member States also have many policy tools at their disposal to meet the target, including the regulation of businesses above a certain size.

Figure 2: Why the EU should adopt a farm-to-fork, 50% by 2030 food waste reduction target

Reduce GHG emissions and fight climate change • Meet SDG 12.3 and other SDGs and climate commitments • Reduce GHG emissions and use of global resources • Free up land for nature-based solutions against climate change	**Save money for households, governments, and businesses** • Provide financial savings for businesses, farmers, households, and governments • Protect suppliers within EU from risks and costs of food waste being pushed to them via UTPs and power imbalances
Improve domestic and global food security • Stabilise EU supply chains, particularly considering Russia's invasion of Ukraine • Support food security beyond EU borders • Increase volume of food surplus (within fair limits[15]) available for redistribution	**Climate justice, human rights, and gender equality** • Support human rights and gender equality, as women, people from historically marginalised communities, and people in low-income countries are disproportionately impacted by both climate change and food insecurity • Reduce the negative impacts of climate change, which has a disproportionate impact on low-income countries

Credit: Feedback, 2022.

BOX 2: DEFINING SECTORS IN THE FOOD SUPPLY CHAIN

Primary production: includes harvest waste (waste left on field, animals/produce lost to disease, injury, or poor harvesting techniques) and post-harvest waste (transport/on-farm processing, storage, transport, farm-gate)

Processing: includes processing and manufacturing, transport storage, distribution, and packaging

Wholesale and retail: includes logistics, supermarkets, markets, and other points of distribution

Food service: includes restaurants, hotels, caterers, public canteens, and more

Households: private consumption

Adapted from EU Fusions (2016)[2] and WWF-UK (2021)[16].

THIS REPORT RELIES ON THE MOST UP-TO-DATE AND ROBUST DATA SOURCES AVAILABLE

Since the official EU baseline data for 2020 has not yet been published, we have based our estimates of EU food waste on the most up-to-date publicly available data from WWF-UK (2021)[9] and UNEP's Food Waste Index (2021)[17], which are more robust sources than the out-of-date previous FUSIONS estimates of food waste in the EU (88 million tonnes per year in 2016[2]). UNEP's Food Waste Index represents the world's most up-to-date official data on countries' food waste at retail, catering, and household level. The WWF report is the world's most comprehensive up-to-date meta-study on primary production food loss and waste, based on 175 data points for Europe. FUSIONS data from 2016 was used for processing as no newer data was available.

Table 1: Food waste levels in the EU per sector, in millions of tonnes

Sector	Annual waste, in millions of tonnes	Source
Primary production	89.8 (9)*	WWF-UK, 2021
Processing	15.4	FUSIONS, 2016
Wholesale and retail	5.3	UNEP, 2021
Food service	10.5	UNEP, 2021
Households	32.5	UNEP, 2021

** Feedback estimates that roughly 10% of EU primary production food waste, nearly 9 million tonnes, will fall within the scope of the EU's current measurement methodology. This is in line with the EU's previous FUSIONS estimate of primary production food waste. This leaves 80.9 million tonnes of primary production food waste excluded from measurement (see Box 4).*

The estimate for food waste in primary production is based on WWF-UK's estimates of 150 million tonnes wasted in Europe and has been adjusted based on the population of EU Member States. FUSIONS data on processing has been adjusted for the departure of the UK from the EU, based on estimates of waste in UK processing sector by WRAP[18].

THE EU FOOD WASTE REDUCTION TARGET SHOULD LEGALLY REQUIRE A 50% REDUCTION BY 2030

RELEVANT POLICY OPTION: AMBITION

- ✘ Reduce food waste by 15–25% in the EU by 2030 (basic)
- ✘ Reduce food waste by 25–35% in the EU by 2030 (medium)
- ✔ **Reduce food waste by 40-50% in the EU by 2030 (advanced)**

  Note: Feedback recommends that the Commission proposes a target of no less than 50%

In 2017, the European Parliament called on Member States to "take the measures required to achieve a Union food waste reduction target of 30% by 2025 and 50% by 2030 compared to the 2014 baseline".

A LEGALLY BINDING, 50% BY 2030 TARGET IS NECESSARY TO MEET SDG 12.3, OTHER SDGS, AND EU/INTERNATIONAL CLIMATE COMMITMENTS

The EU and its Member States committed to meeting SDG 12.3, which calls for reducing food waste by 50% 2030. Meeting this goal is key to achieving multiple others, such as SDG 13 (Climate Action), SDG 14 (Life Below Water), and SDG 15 (Life on Land), with additional implications for SDG 1 (No Poverty), SDG 2 (Zero Hunger) and SDG 5 (Achieve Gender Equality and Empower All Women and Girls).

A legally binding target will formalise the commitment to the SDGs into law and accelerate Member States' action to meet it. It is difficult to assess what progress the EU has made towards SDG 12.3 given the unavailability of the necessary data points over time. However, as argued by Champions 12.3 — a coalition of executives from governments, businesses, international organisations, research institutions, farmer groups, and civil society dedicated to accelerating progress towards achieving SDG 12.3 — progress until now has been inadequate and urgent action is required if SDG 12.3 is going to be fulfilled[19].

The EU needs to implement a legally binding target that aligns with its commitment to meeting SDG 12.3: a 50% reduction of food waste by 2030. Several of the options presented in the EU inception impact assessment will de facto fall short of meeting SDG 12.3 (which requires a 50% reduction of food waste per capita by 2030): the "medium" option of a 25–35% reduction and the "basic" option of a 15–25% reduction. The "advanced" option of a 40–50% reduction is the sole target whose ceiling would align with SDG 12.3. No options below 50% should therefore be considered for a legislative proposal. If options of 15–25%, 25–35%, or 40–49% are modelled in the EU's current impact assessment, it should be purely for comparative purposes, not for genuine consideration.

Since 2020 is the earliest year of baseline food waste data available for most Member States, this should be the default. However, we recommend that if Member States have baseline data from 2015 (the date of SDG 12.3 adoption) or a later year between 2015–19, they should be able to use this as a baseline year to reward existing achievements as first movers.

An ambitious target will also help to meet commitments beyond the SDGs. The

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European Green Deal commits to reducing the EU's GHG emissions by at least 55% by 2030 compared to 1990 levels, and to have the block reach climate neutrality by 2050. Food waste accounts for at least 6% of the EU's GHG emissions[2]. Evidently, reducing food waste levels by 50% by 2030 will be critical to achieving the European Green Deal. It will also help Member States to zero-waste-to-landfill commitments and Nationally Determined Contributions for the Paris Agreement on Climate Change [20]. As of now, food waste is not explicitly mentioned in a single Nationally Determined Contribution (NDC) to the Paris Agreement, and only 11 countries refer to food loss[21].[c]

c However, the UK's NDC refers to a 'sustainable food system' to be achieved through the Resources and Waste Strategy, which in turn identifies the reduction of food waste as a lever to reducing the UK's GHG emissions.

A LEGALLY BINDING, 50% BY 2030 TARGET WILL SUPPORT FOOD SECURITY BOTH AT HOME AND GLOBALLY

In 2021, the EU imported almost 138 million tonnes of agricultural products from outside of its borders, worth a total of €150 billion. These imports are eclipsed by the amount of food — 153.5 million tonnes — that is wasted in the EU each year[3]. Meanwhile, a global food crisis is unfurling. Already across the block, 33 million people cannot afford a quality meal every second day[4]. Food insecurity in the EU disproportionately impacts women and people with other historically marginalised identities[5]. Since reducing food waste can play a role in reducing food insecurity[22], this means that, in addition to being a driver of climate change, food waste is a key human rights and social security issue.

Russia and Ukraine provide a large part of the global cereal market, and the EU imports much of its oilseed meal, oil and seeds, and fertilisers from Russia, Ukraine, and Belarus[23]. New research shows that the amount of wheat wasted in the EU is approximately half the amount of Ukraine's wheat exports and a quarter of other grain exports[7]. The food crisis associated with the Ukraine war makes it clear that the global food system, which has already been rattled by climate change and COVID-19, must be reformed to ensure long-term resiliency and sustainability[24]. In the long term, accelerating progress on food waste reduction ensures that the EU is well-placed to weather inevitable shocks in the future[24]. In the immediate term, rapidly reducing waste along the supply chain could take some of the upcoming pressure off global markets.

Ambitious action on food waste also supports global food security. Around one-third of the world's food is wasted, while 10% of the world's population faced hunger in 2020[25], showing that there is enough food to feed everyone if we prevent waste from occurring and more effectively distribute food. According to the World Resources Institute, reducing food loss and waste by just 25% by 2050 would close the food gap by 12%[26]. Furthermore, research suggests that reducing post-harvest waste by 50% in supply chains of high-income countries alone could decrease the number of undernourished people in low-income countries by up to 63 million[27]. In addition to the immediate increase in food security, the sheer volume of emissions associated with food waste means that a reduction will also help fight the adverse impacts of climate change, which will continue to drive food insecurity in the future.

Reducing waste, particularly that which occurs on farms, can enhance the resilience of communities across global supply chains by increasing the amount of food that farmers and communities can later eat or sell on the market. This provides a critical safety net in the case of global or local shocks. It also helps farmers earn income that, in turn, can be used to buy food or other necessities[28]. This is particularly important for women farmers. In places where women make up a large percentage of the farming workforce, reducing food waste on farms can increase the return on investment of time spent in fields and reduce the total time needed to work to achieve food security[28].

A LEGALLY BINDING 50% BY 2030 TARGET WILL SAVE MONEY FOR HOUSEHOLDS, GOVERNMENT, AND BUSINESSES

Reducing food waste can help households and governments save money, particularly in such a critical time: inflation in the eurozone reached a record high of 8.1% in May 2022, driven by the rising cost of energy in response to Russia's war on Ukraine[29], and consumer prices were up by 5.1% from January 2021[30]. Households bear a large chunk of the EU's food waste costs, conservatively estimated at around €98 billion[2]. Food wasted at a household level also "costs" more, in the sense that the closer food is to consumption, the more environmental and economic costs it has accumulated from moving down the supply chain. An analysis of initiatives to reduce food waste in London – the one city in the world for which there is benefit and cost data for food waste reduction initiatives – by Champions 12.3 found that the total cost of implementation activities after one year was £168,500.35, while the total financial benefits to the City of London was £15.5 million, with borough councils recouping £1.3 million and citizens £14.2 million[28].

Research by Champions 12.3 found that, for companies, the return on investment in reducing food waste can be high, with 99% of the nearly 1,200 companies across 17 countries analysed reporting a positive return on investment[28]. The median cost-benefit ratio for businesses involved in food waste reduction initiatives was 14:1[28]. The highest rates of returns tended to be seen by restaurants, but hotels, food service companies, and retailers also had return ratios ranging from 5:1 and 10:1[28]. There are also non-financial incentives for businesses to partake in food waste reduction efforts: better relationships with stakeholders across the supply chain and better customer retention and loyalty[28].

A LEGALLY BINDING, 50% BY 2030 TARGET WILL SUPPORT CLIMATE JUSTICE

The EU is one of the world's largest emitters, yet countries in northern and eastern Europe stand to be among the world's the least impacted by climate change economically[31]. Meanwhile, severe prediction scenarios show some countries in southeast Asia stand to lose 50% of their Gross Nominal Product (GDP) by 2048[31]. This is an issue of global climate justice and gender equality: as women are disproportionately negatively impacted by climate change, taking action to avert the climate crisis is a prerequisite to meeting SDG 5 (Achieve Gender Equality and Empower All Women and Girls)[32].

For the sake of global climate justice and meeting SDG 5, the EU must reduce food waste by the most ambitious level that it possibly can. With the Commission delegated decision (EU) 2019/1597[33], which provided Member States with a methodology and timeline for reporting on food waste levels, and the current consultation on a reduction target, the EU is fortunate to be in a position where it can act decisively and ambitiously on food waste reduction. It is essential that it now does so.

THE EU FOOD WASTE REDUCTION TARGET SHOULD BE FARM TO FORK

In 2017, the European Parliament called on Member States to implement a 50% food loss and waste reduction target covering "the whole supply chain, including in primary production, transportation and storage" [12]

RELEVANT POLICY OPTION: SCOPE

- ✔ **A target covering the food supply chain from farm to final consumer (S1)**[d]
- ✘ A target covering only selected stages of the food supply chain (S2)

Until now, action on SDG 12.3 has been hampered by ambiguity in whether the 50% target should apply to the whole food supply chain or just the retail and consumer stages. However, Champions 12.3 has been clear that states "should apply the 'halve per capita' in practice to food losses [i.e. pre-retail food waste], as well, not just to food waste" at a retail/consumer-level only. In 2017, the European Parliament also made it clear it supports this position (see quote opposite).

The European Commission presents two options for the food waste reduction target: one that covers "the food supply chain from farm gate to final consumer" (Option S1) or applies only to "select stages of the supply chain, such as household and retail" (Option S2). It is vital that the EU adopt Option S1 for several reasons:

- Retail waste accounts for just 7% of food loss and waste in the EU, as measured within scope of the delegated decision[33]. In comparison, twice as much food is wasted in the food service sector (15% of measured food waste), and three times as much food is wasted in the processing sector (21%). Nearly twice as much is wasted in the primary production sector (12%), based on our estimates of how much primary production food waste is within scope of the EU's delegated decision. For the sake of proportional coverage, these sectors must be included. Additionally, there is far more primary production food loss and waste currently out of scope of measurement (see Box 4 for more details on measurement in this sector).

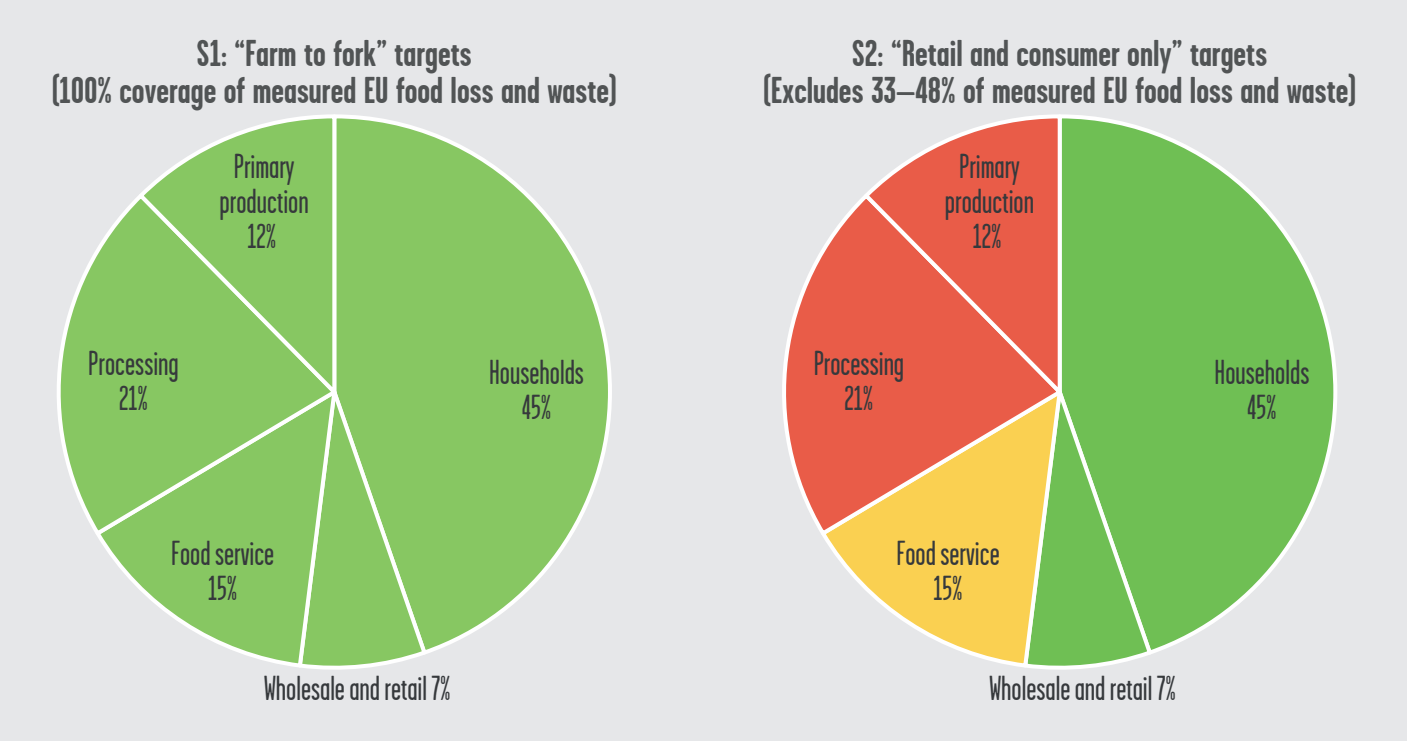
- Option S2 would exclude primary production, processing, and potentially food service (see Box 3), failing to cover from 33% and up to 48% of waste that occurs in the EU and unfairly limiting food waste reduction efforts to households while leaving most businesses unaccountable for food waste reduction.

- Excluding primary production, processing, and the food service sector would create perverse incentives for Member States and companies to achieve reductions in food waste by pushing risks and costs of food waste onto farmers and manufacturers, which in turn increases the risk of UTPs.

Figure 3 presents the share of EU food waste covered by each of the European Commission's proposed waste reduction target options. (Note, however, that the level of food waste in primary production captured by the EU's delegated decision on food waste measurement is far lower than the actual level of waste in the sector; this is discussed in more detail in Box 4.)

d Note that this target is not truly farm to fork, given the Commission delegated decision (EU) 2019/1597 on measuring food waste does not include "plants prior to harvesting", which account for a significant amount of waste created on farms (see Fig. 4).

Figure 3: Share of measured EU food waste covered by reduction target options (excluding food waste unmeasured under delegated decision)



BOX 3: WHY SHOULD FOOD SERVICE BE INCLUDED IN THE TARGET?

Food service accounts for 15% of the EU's measured food waste. It appears that food service will be included in the food waste target option that covers farm gate to final consumer, but the inception impact assessment's wording makes it unclear whether it would be included in the retail/household-only food waste option (S2). In a worst-case scenario where Option 2 is adopted, it is imperative that it includes the food service sector to legitimise the efforts that Member States have made to reduce food service waste at a national level. For example, in France, an anti-waste law for a circular economy (*Loi no. 2015-992*, known as AGEC) enacted in 2020 sets a 50% reduction target by 2025, compared with 2015, in food distribution and collective catering[34]. Germany's national strategy to reduce food waste also highlights catering as a key area in which to reduce food waste, and the German Environment Agency also published guidelines on preventing food waste in the catering sector in 2016[35]. In Luxembourg, the national plan for waste and resource management stipulates close monitoring of food waste occurring in restaurants and gastronomy sectors[35], and restaurants are included in the voluntary agreement launched with the private sector to reduce food waste in Portugal[35].

EuroCommerce, an umbrella organisation for Europe's 27 leading retail and wholesale companies with members in 31 countries, notes in its October 2021 response to the food waste consultation roadmap that retail and wholesale account for just a fraction of food waste and that "success will be anchored to the involvement of all the actors of the supply at their level of responsibility: Retail and consumers cannot bear the responsibility alone for reducing food waste".

CONTRARY TO POPULAR BELIEF, PRE-RETAIL "FOOD LOSS" IS NOT LOWER IN HIGH-INCOME COUNTRIES

A pervasive myth is that so-called "food loss" (a technical term for food waste at the pre-retail level) is only/primarily a problem in low-income countries. However, the most rigorous meta-study conducted to date on global on-farm food loss and waste, conducted by WWF and based on 2,172 farm-stage food loss and waste data points, shows that food loss and waste on farms is higher in high-income countries than in low-income countries, as a per capita basis and as a percentage of production[9]. Levels of food waste occurring in the pre-retail sectors of primary production and processing in the EU are significant; the same study found that each year, 150 million tonnes of food are wasted on farms in Europe. Adjusted for the population of EU Member States, this means that approximately 90 million tonnes occur on farms in the EU. However, most of this is currently excluded from measurement under the EU's delegated decision on food waste measurement (see Box 4 and Figure 3 for more details).

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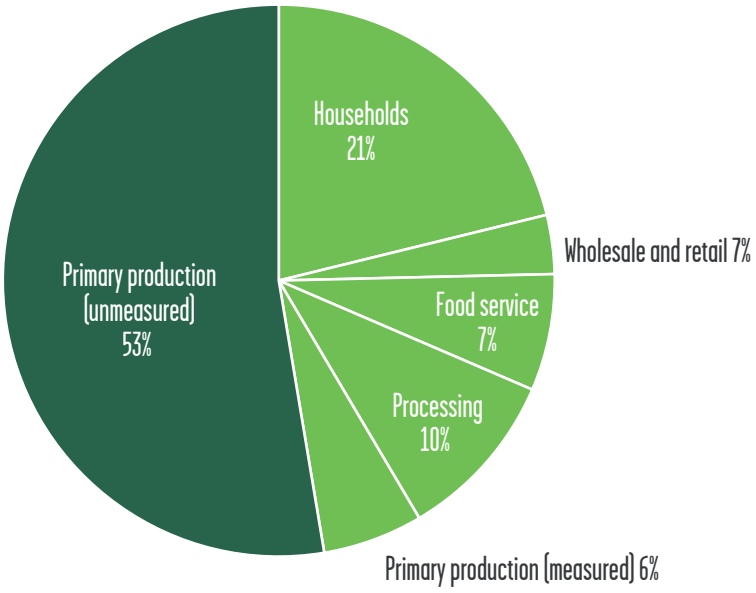
BOX 4: EU FOOD WASTE MEASUREMENT NEEDS TO EXTEND TO COVER ALL ON-FARM FOOD WASTE

The EU delegated decision on food waste measurement currently argues 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. This is despite Champions 12.3's recommendation 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"[36]. This is a serious issue, as it means that, in practice, food left unharvested in the field or ploughed back in or left to rot post-harvest would not be captured in a reduction target[e].

Given this, the exact share of waste on farms covered by the "farm to final consumer" option is difficult to precisely estimate and will be until EU member state data is published later in 2022, but we estimate it to be about 9 million tonnes – or just 10% of the waste that occurs on EU farms (see Table 1 for more details on this calculation). **Regardless, for the target to be as effective as possible, it is vital that all on-farm waste measured under the delegated decision is included in reduction targets** – regardless of how small of a share of total primary production food waste it constitutes. Additionally, to improve coverage of waste on farms, the Commission should extend the food waste measurement framework to cover primary production for Member States that wish to do so (see 'Recommendations for the EU').

Figure 4: Unmeasured vs. measured food loss and waste under current EU delegated decision on food waste measurement



Note: This chart assumes that roughly 10% of the EU's primary production food waste, as estimated by WWF-UK (2021), is currently within scope of the EU measurement methodology.

e Given the issues with the wording of the EU delegated decision, it is critical that the EU encourage Member States to voluntarily measure and reduce food waste on farms and provide them with the tools and financial support to do so.

INCLUDING PRIMARY PRODUCTION AND PROCESSING IN THE TARGET IS VITAL TO PROTECT ACTORS IN THOSE SECTORS

The high levels of food "loss" occurring pre-retail in the EU are largely a symptom of unequal power relations between suppliers (farmers and processors) and their buyers (both retailers and their middlemen)[37,38]. The concentration of the retail sector allows powerful corporations to wield a great deal of power over actors upstream in the supply chain and to act with only their own bottom line in mind. These dynamics drive the creation of food waste, and if a food waste reduction target ends at the retail level, the problem may only become worse: retailers will have additional incentives to push their waste back onto manufacturers and farmers.

Retailers' waste management practices are decided based on economic cost, environmental impacts, and regulation[34], and the costs and risks of food waste are often unfairly externalised from one supply chain actor to another. For example, in the processing sector, processers report being subject to increased demand in advance of predicted peak demand periods (such as barbecue-ready cuts of meat in the summertime), without clear advance forecasting. As a result, products that do not meet the changing specifications may go to waste[39].

When it comes to primary production, fruit and vegetables are often rejected by buyers on cosmetic grounds for being the wrong size, shape, or appearance, even though they are usually perfectly edible. One farmer reported to Feedback that they were wasting 25% of their carrots (equal to 1,750 tonnes annually) due to cosmetic rejections[38]. A survey of Flemish farmers in Belgium found that two-thirds report wasting food because of cosmetic specifications, with one-fifth of farmers reporting losses of over 40%[40]. Crucially, suppliers report that the stringency of these standards fluctuates depending on market demand, highlighting that in many cases the rejection of produce is not actually about what consumers are willing to consume[37].

On problematic retailer buying practices, an EU-based fresh produce insurer says:

"It's evident that supermarkets reject food when they have undersold a product - this is well-known behaviour within the sector. and at times of year, when they need the stock, they will be less scrupulous and reject less. This is totally inconsistent and, as we know from inspections, not related to the quality of the product itself. We know it is to do with supply and demand[37]."

Retailers or buyers may also cancel an order with a farm at the last minute, making it impossible for farmers to find an alternative buyer before the produce spoils[39]. (This is a form of UTPs but requires suppliers to be aware of their rights to seek adequate recourse.) Cancellations are sometimes linked to buyers shopping around for the cheapest supplier and cancelling an order to save money if a lower price for a product is found. Farmers are then forced to absorb the financial loss themselves[37].

Unsurprisingly, many EU farmers are struggling to get by. Campaigners estimate that some 600 EU farmers take their own lives each year[41]. In the EU, the average farm family income in 2018 was just €22,500 when expressed per family labour unit[42]. (In comparison, an average two-earner couple in the EU could expect to earn €49,340 in the same year[43].) The situation is particularly difficult for the EU's women farmers, whose farms have a 38% lower income per annual working unit than those run by men[42]. Including farms in a food waste reduction target is an important means of improving farmers' livelihoods: analysis by WRAP in the UK has shown that reducing on-farm waste has the potential to increase profits for farm businesses by 20%[44].

If the food waste reduction target does not cover pre-retail sectors, business practices that drive food waste at the expense of the livelihoods of farmers and manufacturers will be allowed to continue unfettered. They may even worsen if Member States implement the EU target through measures that incentivise businesses to push waste elsewhere in the supply chain, such as mandatory food waste reduction targets covering retailers' in-store waste only.

For this reason, there is wide support for a 50% by 2030, farm-to-fork reduction target. In 2017, 67 European organisations called for a legally binding EU food loss and waste "reduction target of 50% by 2030 to be specified as farm to fork" and that "this means that it should include not just retailer and consumer food waste, but also food wasted at the primary production, manufacturing, and distribution levels"[45]. This call was reiterated by many groups in an open letter to Stella Kyriakides, European Commissioner for Health and Food Safety[46]. In it, the signatories point to the harm of excluding food waste in primary production and focusing the Farm to Fork strategy actions on food waste created at retail and consumer levels. "Food waste should be addressed holistically, as early as from the farm and all the way to the fork," the letter states. "In this regard, we are disappointed by the lack of attention to food waste occurring at the primary production level and the early stages of the supply chain".

Says Martin Häusling, Member of European Parliament and agricultural policy spokesman for the Greens/European Free Alliance (FEA) group, "We need binding targets at every stage of the supply chain in order to achieve the necessary food waste reduction."

WHY A 50% BY 2030, FARM-TO-FORK TARGET IS AMBITIOUS, BUT ACHIEVABLE

Although slow rates of progress on food waste in the past may make the prospect of a legally binding farm-to-fork food waste reduction target of 50% by 2030 for EU Member States seem daunting, this target is entirely achievable. By levelling the playing field for all Member States, it will jumpstart ambitious action on a scale we have yet to see, finally putting SDG 12.3 and other SDGs in reach. The following section presents evidence on the scale and pace of change that can be achieved and recommendations for the EU and Member States as they progress towards defining targets.

A LEGALLY BINDING TARGET WILL INCREASE THE POTENTIAL FOR ACCELERATED ACTION

To achieve a 50% by 2030 reduction in food waste for countries beginning from a 2020 baseline, reductions of 5% per year will be required; lower reductions will be necessary for Member States granted the use of earlier baselines, where available. There is ample evidence from leading businesses and Member States that food waste reduction can be achieved at sufficient speed if the right policies are in place. For instance:

- At its growing, packing, and processing sites in the UK and Spain, G's Fresh achieved a 43% reduction in food waste between 2017/18 and 2019/20, equal to over 21% reduction per year and over 20,000 tonnes food waste reduced[47].
- In Kellogg Company's global manufacturing operations, it reduced its food waste tonnage by 17% relative to total food handled between 2016 and 2019, equal to 5.6% per year reductions[48].
- IKEA has cut production food waste in their restaurants, bistros, and Swedish Food Markets by 46% since 2017[49], equal to about 9% reduction per year.
- In Belgium, Oostende canteen achieved food waste reduction of 40% between 2021–22[50,51].
- In Poland, Novotel Warsaw Centrum achieved reductions of 55% in their food waste in one year[52].
- In retail, Carrefour achieved food waste reduction of 28.7% between 2016–20, equal to about 7% reductions per year[53].
- Kroger achieved food waste reduction in their supermarkets of 19.3%, from about 332,000 tonnes in 2017 to about 268,248 tonnes in 2020, which is a reduction of about 6.4% per year[54].
- In Denmark, concerted action by the government and businesses to reduce food waste across the whole supply chain saw levels of food waste in retail/wholesale and food service fall by 13% and 11% per year respectively between 2014 and 2018[55,2].

Credit: Feedback

These examples demonstrate that progress is indeed possible if sufficient infrastructure, financing, and motivation are in place. The reason that food waste reduction has not yet occurred at this speed in most countries across the EU is that they have relied on voluntary agreements. Voluntary agreements have seen some successes (as the case of Denmark demonstrates) but have serious limitations when deployed on a national scale. In many cases, certain sectors are not covered, there is patchy participation within the sectors that are covered, agreements are plagued by a lack of transparency, and laggards "free-ride" on the process without fear of punishment. A lack of a level playing field for businesses can create fear of being a first mover; for instance, in 2013, when Tesco, the UK's largest food retailer, became the first UK retailer to publish its food waste data, it faced singular scrutiny and criticism, leading to reluctance from other retailers to publish their data as well. An analysis of voluntary agreements in Germany, the Netherlands, and the UK finds:

- Measuring progress is difficult, with none of the three countries having full data coverage across all sectors. For instance, the Netherlands recently published a progress update on food waste, but it only covers households and retail[56]. In Germany, the primary production and processing sectors do not appear to have concrete reduction targets or baseline data available to monitor their progress.

- Participation from relevant companies is often limited. In the Netherlands, 20% of the retail market does not participate in a voluntary agreement. In Germany, just 35% of the retail sector participates[57]. In the UK, only one-third of the UK's largest food businesses participates, meaning 40% of sector turnover is left unmeasured and unaccounted for[58].

- Businesses often fail to report their data publicly. In the UK, just 60 businesses reported their food publicly in 2021, and in many cases, they do not report overall tonnages or tonnage as a percentage of food handled (despite this not being in compliance with the terms of the voluntary agreement)[59]. WRAP called this "disappointing" and concluded that "mandatory food surplus and waste reporting are essential if SDG 12.3 is to be achieved" [59].

- Even among participants in voluntary agreements, there is almost no accountability for laggards and free riders and no mechanism for punishing businesses that are untransparent or slow to act on food waste. If individual businesses do not share their food waste data publicly, as if often the case, these actors can hide behind sector-wide figures.

These limitations of voluntary agreements slow overall progress, result in patchy participation, and enable free riders and laggards, even if some business leaders demonstrate that some progress is possible.

Such issues are not exclusive to the food waste sector; a report by MSI (Multi-Stakeholder Initiative) Integrity on the performance of voluntary agreements across a range of industries found a broad failure of multi-stakeholder initiatives to protect against abuse and achieve environmental and social outcomes[60]. Similarly, a study by the Royal Society for the Protection of Birds (RSPB) found that, out of over 150 voluntary schemes on a range of environmental and social issues, over 80% were performing poorly on at least one indicator, and most presented unambitious targets that they failed to meet. Progress was undermined by low rates of private sector participation, resulting in a failure to create the "level playing field" that spurs ambitious action by businesses. These findings refute claims that voluntary action can be an effective alternative to regulation, concluding that "the impacts of most voluntary schemes are limited"[61].

On voluntary agreements, MSI Integrity finds:

The presence of an MSI should not be a substitute for public regulation. MSIs do not eliminate the need to protect rights holders from corporate abuses through effective regulation and enforcement. To the contrary, the existence of an MSI should put governments—as well as MSIs and their supporters—on notice that a governance gap exists, and that they need to supplement the voluntary efforts of that MSI with mandatory measures at local, national, and international levels[60].

In contrast, there is strong evidence from other sectors that regulation can yield far faster progress than voluntary measures, by levelling the playing so that laggards are brought up to the level of industry leaders. For instance:

- EU-level regulations on air quality in Europe were implemented between 2004–2015, and overall emissions of key air pollutants have declined since 2005[62,63].

- The Directive 2002/96/EC on waste electrical and electronic equipment (WEEE), introduced by the EU in 2012 to combat the rising amount of WEEE, has prompted innovation in recycling methods and higher capture rates[64].

- In England, a consumer tax on single-use plastic bags introduced in 2015 reduced the use of plastic bags by more than 95%, with additional reductions expected since the tax was increased to 10 pence in May 2021[65].

- The 2021 survey of the UK Groceries Code Adjudicator, created in 2013 to ensure fairness in the commercial relationships between large UK supermarkets and their direct suppliers, found that suppliers reported the highest-ever level of compliance with the code[66]. 29% of suppliers reported a violation, down from 36% in 2020 and 79% in 2014, in the Groceries Code Adjudicator's first year of action[67].

These regulations also encouraged more ambitious action on part of other actors. This regulation, in turn, motivated more ambitious action on the part of Member States. Since 2021, national-level regulation in France has required some businesses to display a repairability score for certain items to increase transparency for consumers, while the UK has passed a Right to Repair law that legally requires manufacturers to make spare parts available to citizens and third-party repair companies for certain electronic items[68]. The establishment of the Groceries Code Adjudicator opened the door for more ambitious campaigning by the Groceries Code Action Network to strengthen its remit (as it stands, Groceries Code Adjudicator does not cover indirect suppliers, which in practice is many suppliers and farms), demonstrating how regulation can provide a launching pad for action that was previously seemed out of reach.

This type of progress underscores the potential for EU Member States to meet an ambitious target once it is in place and should be factored into the Commission's decision-making. If the EU models the potential to achieve future targets on the limited progress of the past, under voluntary action, rather than the potential of the future under regulation, it will undoubtedly conclude that these targets can't be achieved: in essence, it will plan to fail, although success remains in reach.

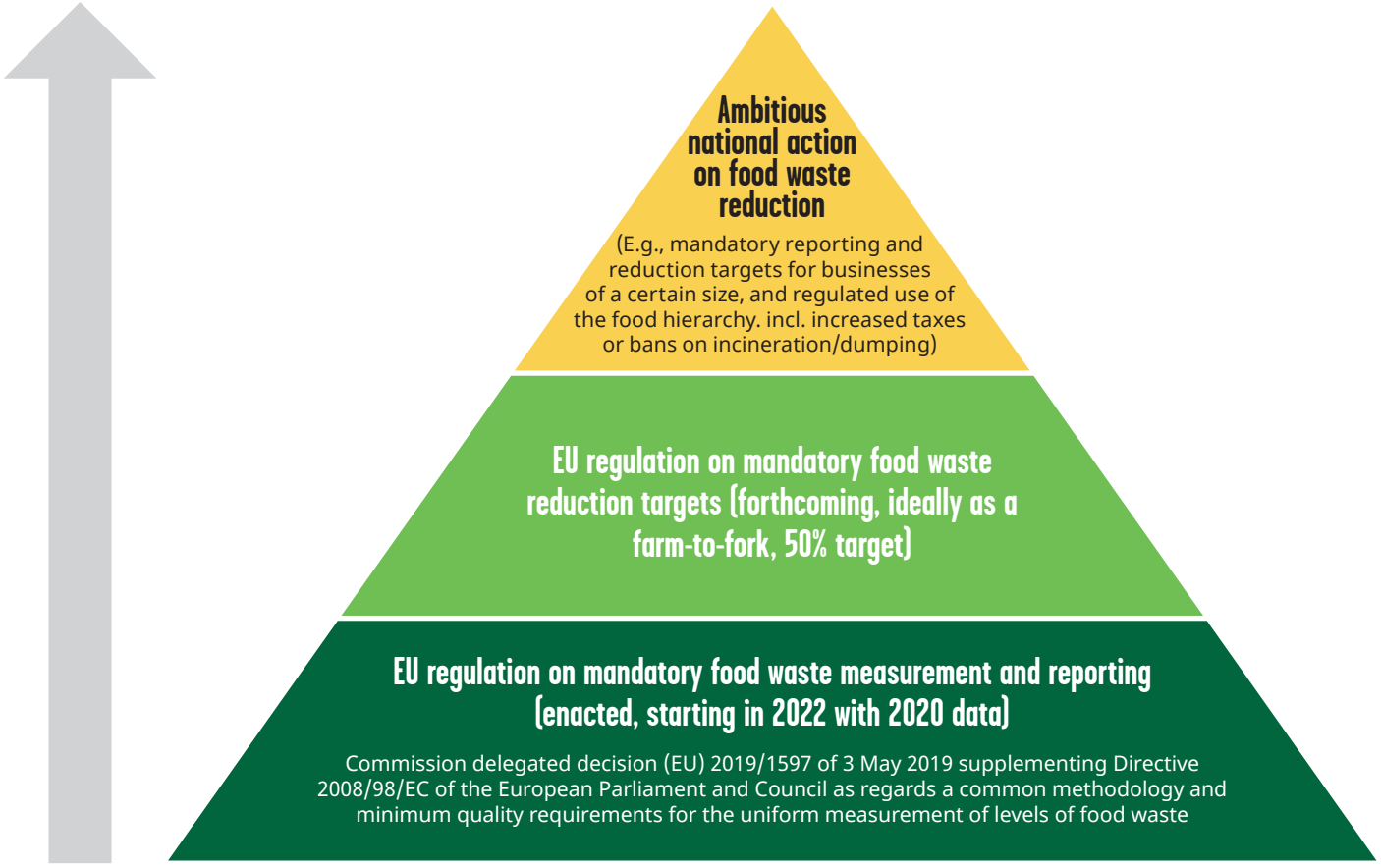
"An EU-level target can be cascaded down to regions and cities," says Pior Barczak, inclusive circular economy expert at the European Environmental Bureau. "This will mobilize authorities to take action and propose legislative measures towards businesses, food producers, and retailers in order to avoid food waste along the whole supply chain."

In their food waste reduction target consultation response, the European Food Banks Federation notes that "the more ambitious the legally binding targets, the stronger the incentives for the Member States to take committed action"[69].

A LEGALLY BINDING, 50% BY 2030 TARGET WILL ENCOURAGE MEMBER STATES TO USE NEW POLICY TOOLS

With a mandatory food waste reduction target enacted by the EU, Member States will have the legislative mandate to take decisive action to achieve much faster and greater progress than has been seen in the past (see Figure 5). This should be considered by Member States when modelling progress towards a 50% by 2030 target as part of the Commission's consultation with stakeholders on the feasibility of different targets.

Figure 5: Regulation pyramid for ambitious national action on food waste.



Credit: Feedback, 2022

Regulatory policy tools that Member States can use to reduce their food waste levels include:

- Mandatory measurement and reporting by food businesses over a certain size
- Mandatory participation in food waste reduction agreements and reduction targets for businesses over a certain size
- Bans and taxes on harmful practices, such as landfill and incineration

- Fines for not following the food use hierarchy, which dictates the ideal destinations for food surplus and waste
- Stronger UTPs legislation, with a food waste focus
- A levy on retailers proportional to the food waste levels of their suppliers

Some Member States have already taken the step of regulating food waste with food businesses, although none yet with a binding reduction target. In France, for example, food retailers are forbidden from destroying unsold food products that are fit for consumption and should follow actions to combat food waste in accordance with the food use hierarchy[70]; in the Wallonia region of Belgium, supermarkets are required to donate their surplus food to charity organisations to renew their environmental permits[35]. Regulation has also been suggested elsewhere in the block: this year, the UK has launched a consultation on the introduction of mandatory food waste measurement for businesses over a certain size, and the UK's 2018 Waste and Resources Strategy also proposed to explore the introduction of mandatory food waste prevention targets in line with SDG 12.3 for relevant food businesses, although this has not yet been enacted[71].

Member States can now take the more ambitious step of requiring all food businesses over a certain size to measure, report, and reduce their food waste[34] (for example, by 50% by 2030, from farm to fork). Regulating food businesses would offer many benefits:

- Compels immediate measurement from point legally enacted
- Compels universal uptake of measurement
- Levels the playing field so companies who publish their food waste data do not face disproportionate media attention
- Incentivises businesses to reduce their food waste to improve their image, which prevents them from hiding behind anonymous aggregated figures
- Provides consistent, comparable data across time, which can be used to enable individual companies to target their food waste reduction (for instance, by signing up to SDG 12.3 to halve their food waste by 2030)
- Guarantees measurement of food waste into the future; companies cannot decide to drop out of measurement when they decide it no longer suits them
- Provides detailed, good-quality data that shows which areas need to be focused on, and where the biggest opportunities are for emissions reductions as a contribution toward climate change commitments
- Offers comparisons of different food waste levels between similar companies, which can reveal the potential for change in the companies with higher waste levels; this provides opportunities to imitate the best practice

- Protects farmers by strengthening their negotiating position vis-à-vis business behaviour, and exposes UTPs

- Allows Member States to make more rapid progress towards climate-related goals, including UNFCCC Nationally Determined Contributions to the Paris Agreement and the National Energy and Climate Plans required by the EU[34]

Research suggests that businesses' waste management practices are decided based on economic cost, environmental impacts, and regulation[34]. Therefore, without regulation in place, businesses may continue to default to a market-driven approach that does not account for the negative social, economic, and environmental impacts of food waste. As demonstrated elsewhere in this report, the costs and risks of food waste are often unfairly externalised from one supply chain actor to another.

"With reducing food waste having been identified by Project Drawdown as the top solution for a two-degree maximum warmed world — coming in above electric cars, solar power and a plant-based diet — it's absolutely imperative that the EU legislates for a 50% reduction in food waste by 2030 from farm-to-fork," says Tessa Clarke, co-founder and CEO of OLIO. "This not only aligns the EU with the United Nations Sustainable Development Goal 12.3, but it also provides an essential impetus to businesses to make the bold changes that are needed to eliminate the scourge of food waste from our society."

BOX 5: BUSINESSES SHOULD GET ON BOARD WITH REGULATION

Regulation on food waste and government interventions designed to reduce cross-supply chain power imbalances (like UTPs and over-application of cosmetic standards) can aid businesses with their bottom line, particularly vulnerable actors who do not usually have the power to reduce food waste. Introducing regulation also removes the stigma and risk of being a "first mover" on sustainability issues and provides a more level playing field in which to operate, enabling businesses to better collaborate (rather than compete) on shared sustainability challenges[72].

A LEGALLY BINDING, 50% BY 2030 TARGET WILL FOSTER AN ENABLING POLICY ENVIRONMENT

Having set an ambitious food waste target, the EU will seek to foster an enabling environment for mutual support between the EU and its Member States on food waste reduction efforts. With all Member States incentivised to act, there will be far more best practices and lessons learned on food waste reduction activities and policy tools to share, allowing Member States to better assess what options will work best for them. A heightened focus on activities that support food waste prevention means that the EU will likely also provide Member States with financial and technical support to enact these measures, further spurring progress and action.

RECOMMENDATIONS

RECOMMENDATIONS FOR THE EU

1. SET A LEGALLY BINDING, 50% BY 2030 FOOD WASTE REDUCTION TARGET

Set a legally binding target to reduce the EU's food loss and waste by 50% by 2030, which enshrines the EU's commitment to the SDGs into law. This will unlock the full benefits of ambitious food waste reduction: saving money for EU businesses, governments, and households; supporting food security; upholding the principles of climate justice; and helping the EU and its Member States to meet national and international climate commitments.

2. SET A FOOD REDUCTION TARGET THAT IS FARM TO FORK

Ensure this 50% target covers food loss and waste from all sectors farm-to-fork, including food service, processing, and primary production – not just retail and consumer level food waste. Initially, this will be restricted by the scope of the delegated decision on food waste measurement[33], but could in future be extended to cover all primary production food loss and waste (see Recommendation 3). This is vital for comprehensive coverage, given that nearly half of food waste occurs in these sectors of the supply chain, and it will prevent powerful retailers from pushing waste upwards once an ambitious target is in place.

3. EXTEND MANDATORY FOOD WASTE MEASUREMENT TO COVER ALL PRIMARY PRODUCTION FOOD WASTE, FROM THE POINT AT WHICH FOOD IS MATURE ENOUGH TO HARVEST

Conduct a review of extending EU measurement of food loss and waste to include all food wasted at primary production – with a view to creating a baseline that could mean all primary production food waste is eventually included in food waste reduction targets. This should include the currently excluded categories of mature, edible food that is left unharvested in the field, and food that is harvested but later used on farm (for instance, by being returned to the field to be ploughed in). If including primary production is considered legally outside of the scope of the revised Waste Framework Directive and formal measurement methodology, we strongly recommend that the Commission introduce mandatory measurement through other legal avenues, such as via the Common Agricultural Policy (CAP). It should open a review of how to do this as soon as possible, in full consultation with civil society, businesses, and policymakers from the European Parliament and Council.

In the meantime, ensure that any "farm gate to final consumer" target includes harvest waste as an additional point on which Member States can voluntarily report and reduce, ideally by 50% by 2030 as with other sectors of the supply chain.

4. WHEN MODELLING THE FEASIBILITY OF A 50% REDUCTION TARGET, FOCUS ON INDUSTRY LEADERS AND THE POTENTIAL UNLEASHED BY REGULATION, NOT ON THE LIMITATIONS OF PAST VOLUNTARY ACTION

When modelling the feasibility of achieving a 50% reduction in food loss and waste from farm to fork by 2030, the Commission must focus on:

- The proven fast rates of food waste reduction achieved by industry leaders
- The historically proven potential of regulation to accelerate action and level the playing field to ensure that the environmental performance achieved by industry leaders is replicated across whole sectors (a range of food waste-specific regulatory options on food waste on p24).

This ensures that feasibility studies on the target will account for the significant increase in EU and national action possible once legally binding targets are in place, and Member States implement policies to ensure that whole sectors achieve the levels of food waste reduction demonstrated by industry leaders (see recommendations for Member States in the next section).

5. FOSTER AN ENABLING POLICY ENVIRONMENT FOR MEMBER STATES TO SHARE INFORMATION AND ACT

To create an enabling and motivating environment for Member States, the EU should also review other policies which may impact Member States' ability to reduce food waste. The EU could provide financial support to Member States for measurement and prevention activities, as well as introducing supportive EU-wide policies and sharing best practice. This includes action taken under the CAP, such as revising subsidy and investment schemes that lead to systemic overproduction or oversaturated markets; promoting knowledge-sharing and innovation between actors in the supply chain; and supporting the development of markets to sustainably absorb surplus produce[34]. It should also revisit policies that create perverse incentives to use food waste for energy creation and re-examine legislation that blocks certain types of food waste flows, such as those that are animal-based, from being reused and recycled[73,74]. Forthcoming changes to date marking regulation will likely also be helpful[75].

6. ALLOW MEMBER STATES TO USE 2015 BASELINE DATA ON FOOD WASTE LEVELS

All member states will have food waste baseline data from 2020 onwards, mandated by the delegated decision on food waste measurement[33]. To reflect and reward progress by first movers, the EU should allow Member States that began collecting data on their food waste levels earlier than 2020 to use an earlier baseline year, to measure 50% reductions against. The earliest baseline year possible should be 2015, because this is the year SDG 12.3 was adopted. Hybrid baselines can be used where data on one sector is available earlier than another (for instance, a baseline of 2016 for households, and 2020 for manufacturing). This accounts for action taken in good faith before the measurement requirement in the revised Waste Framework Directive came into place.

RECOMMENDATIONS FOR MEMBER STATES

1. MODEL THE POTENTIAL TO ACHIEVE EU-LEVEL TARGETS USING AMBITIOUS POLICY TOOLS

When modelling the feasibility of achieving a 50% by 2030 reduction target, Member States should also consider both the proven fast rates of food waste reduction achieved by industry leaders and the historically proven potential of regulation to accelerate action, observed in other sectors. Regulatory tools to assist with national food waste prevention should therefore be considered, including:

- Mandatory measurement and reporting by food businesses over a certain size
- Mandatory participation in food waste reduction agreements and reduction targets for businesses over a certain size
- Bans and taxes on harmful practices, such as landfill and incineration
- Fines for not following the food use hierarchy, which dictates the ideal destinations for food surplus and waste
- Stronger UTPs legislation, with a food waste focus
- A levy on retailers proportional to the food waste levels of their suppliers

2. CONSIDER IMPLEMENTING THE TARGET BY REGULATING FOOD BUSINESSES OF A CERTAIN SIZE

If Member States choose to place a food waste reduction target on food businesses, data on non-compliance should be made publicly available in a central database as part of the measurement and reporting scheme. Targets set for the reduction of food waste in suppliers like farmers and manufacturers should recognise that waste is often caused by buyer policies and should, therefore, be implemented alongside regulation designed to ensure issues related to power imbalances and UTPs by producers and supermarkets are solved systemically. Measures should also be introduced to ensure retailers have shared accountability for their suppliers' waste: for instance, supermarkets of a certain size should be required to report on food waste levels in their suppliers, as Tesco has done in the UK. This ensures that retailers cannot push their waste back onto suppliers without their responsibility being made clear. We recommend charging a levy on supermarkets proportional to the food wasted by their suppliers to reflect their shared responsibility for this, which could be spent on assisting producers and processors to reduce food waste. This would effectively internalise the incentives for retailers to change policies creating their suppliers' waste. Small and medium-sized enterprises (SMEs) should also be exempt from punitive measures and instead offered support to voluntarily measure and reduce food waste.

CONCLUSION

The potential environmental, economic, and social gains of reducing food waste are enormous. Reducing food waste would allow the EU and its Member States to meet SDG 12.3 and other climate commitments, improve food security, save money for citizens, governments, and businesses, and support climate justice and human rights. In enacting ambitious and binding food waste reduction targets, the EU has a remarkable opportunity to seize these benefits and demonstrate global leadership on one of the defining issues of our time.

We urge the Commission to adopt a food waste reduction target of no less than 50% by 2030, with this 50% target applied to the whole supply chain from farm to fork (and including as much waste occurring on farms as methodology and legislation will allow). This ambitious target has wide support from businesses, civil society, policy makers, and consumers, and anything less than this target would send the message that the EU plans to fail to meet SDG 12.3. Evidence from industry leaders shows that this pace of food waste reduction is possible and that regulation is required to overcome the limits of voluntary action and ensure laggards pull their weight so whole sectors move at this pace.

With a 50% by 2030, farm-to-fork target in place, the EU will be poised to emerge as a world leader on food waste reduction, mobilising its Member States to take decisive, ambitious action in turn. We encourage Member States to embrace a target that is ambitious in scale and scope on the basis that it is fully achievable. Member States have an array of tools at their disposal to meet ambitious EU-level goals, including the potential to regulate food waste levels in businesses over a certain size. Analysis of regulation on other environmental and social issues demonstrates that swift and significant progress can be made when appropriate regulatory measures are put in place.

As 2030 draws ever closer and the impacts of climate change begin to accelerate, there is no time to waste when it comes to reducing the EU's food waste. Overlapping climate, health, and geopolitical crises highlight the scale of the work needed to transform our food system towards resilience and sustainability. Now is the moment for the EU to rise to the challenge.

ANNEX

ADDITIONAL STATEMENTS OF SUPPORT

“If the EU is serious about reducing food waste and transitioning to sustainable food systems, it needs to adopt a binding target of 50% reduction covering the whole food supply chain. So far, sole focus on citizens and voluntary measures have proven to be inefficient. Therefore, only through holistic thinking and policy will we achieve deep and transformative change.”

Pierre Condamine, formerly Zero Waste Europe

“We have only few years left to reach the SDG target 12.3 to which all governments of the EU have committed back in 2013. Since then, not much has happened and our economies still generate incredibly high amounts of food waste. The EU must urgently revise this target within the EU Waste Directives and make it mandatory. This is the only way to mobilize substantial action to cut food waste at national level and at EU level by at least 50% along the whole supply chain (including production and retail).”

Piotr Barczak, European Environmental Bureau

“The previous three federal governments in Germany have repeatedly promised to take action against food waste. In the end, they did next to nothing. The last government’s attempts to rely on voluntary commitments by producers and retailers have failed. Food waste continues to be expensive and harmful to the environment and climate. We are running out of time in our efforts to establish a sustainable food system that fits into our planetary boundaries. Reducing food waste is a low-hanging fruit to do so. Therefore, we urgently need EU-wide legally binding reduction targets, covering the whole value chain from farm to fork.”

Elisa Kollenda, Environmental Action Germany (DUH)

“The European Commission has committed to halving food waste by 2030. However, it is not enough to set ambitious goals without ensuring their achievement with concrete legislative proposals, which need to be drafted by the European Commission in the upcoming months. In its resolution on the Farm to Fork strategy, the European Parliament made it clear that levers such as revising the best-before date must be approached in an ambitious manner. We furthermore need binding targets at every stage of the supply chain in order to achieve the necessary food waste reduction.”

Martin Häusling, Member of European Parliament and agricultural policy spokesman for the Greens/European Free Alliance (FEA) group

“We demand EU-wide binding targets to reduce food waste at all stages of the value chain. To this end, it is essential to conduct an overall survey ranging from the pre-harvest stage to the stage of consumption in private households. This is the only way to determine whether measures are sensible and effective. We have no time to lose.”

Hanna Legleitner, Restlos Glücklich

“Too Good To Go supports binding food waste reduction targets, in order to meet UN Sustainable Development Goals 12.3. Binding targets should apply at every stage of the supply chain, in order to achieve an EU-wide food waste reduction target of 30% by 2025 and 50% by 2030 compared to the 2014 baseline.”

Christophe Diercxsens, Too Good To Go

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