

## Advice

### EU-Level Targets for Food Waste Reduction

Brussels, 30 March 2022

#### 1. Background

In May 2020, the European Commission adopted the Farm to Fork Strategy<sup>1</sup> to reduce the environmental and climate footprint of the EU food system and facilitate the shift to healthy and sustainable diets. The strategy aims at addressing, amongst others, food waste, and announced EU-level targets for food waste reduction. The initiative also builds upon the 2015 Circular Economy package, a set of actions and new legislative proposal on waste and the Waste Framework Directive<sup>2</sup>, adopted in 2018, which includes provisions on food waste (definition, obligation for monitoring, possible targets).

As described in the Commission's Inception Impact Assessment, up to 20% of all food produced in the EU ends as food waste, 88 million tonnes of waste annually (including both edible and inedible parts). Food waste is source of inefficiency in the food chain and depletes natural resources. Along the food supply chain, food waste contributes 8-10% of the total greenhouse gas emissions. It creates pressure on the natural environment and on humans. It also raises ethical considerations, as a symbol of environmental destruction and social injustice.

The Commission published the Inception Impact Assessment on 1 October 2021, which was open to feedback until 29 October 2021. A public consultation is planned for the second quarter of

---

<sup>1</sup> [Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system](#)

<sup>2</sup> [Directive 2008/98/EC on waste and repealing certain Directives](#)

2022. The adoption of the legislative proposal is planned for the second quarter of 2023, as part of a revision of the Waste Framework Directive. Under the Work Programme of Year 6 (2021-2022), the MAC committed to work on the initiative, taking into account the potential effects on the market of fishery and aquaculture products.

## **2. Objectives**

The MAC agrees with the potential actions, described in the Inception Impact Assessment, that the Member States could take to reduce food waste, namely improving knowledge and awareness on levels and impacts of food waste, influencing attitudes and behaviours that lead waste and encourage update of waste prevention measures along the food chain, and encouraging change in the food value chain towards less wasteful practices.

In this context, it is important to account that the primary producers, like fish farmers and fishers, are not a source of food waste and that, by definition, by-products are not food waste. Shellfish producers highlight their knowledge in the recovery, recycling and valorisation of shellfish debris resulting from handling during breeding. Methods of collection of shellfish waste from human consumption in households and in restaurants should be implemented, in order to valorise the debris under the various existing recovery schemes. Traditional fishmongers highlight that, thanks to their daily adjustments to supply, donations to vulnerable people in the local area, and the freezing of products / preparation of elaborations when the product does not reach the expected output, the waste is insignificant. Retailers and wholesalers have been successful in tackling food waste both within their own operations and by working with suppliers and consumers, representing for 5% of total food waste.

Taking into account that, in the EU, households generate more than half of the total food waste in the EU, actions to raise awareness amongst the general public are very important.

### 3. Policy options

In relation to the policy options described in the Inception Impact Assessment, under Step 1, for Scope, the MAC's membership generally supports Option S1 (target covering the whole food value supply chain, from farm gate to final consumer). On the other hand, the EU aquaculture sector believes that, for efficiency purposes, Option S2 (target covering only selected stages of the food supply chain) would be more appropriate, while including public procurement.

For Expression, the MAC supports Option E1 (target expressed as % of food waste reduction).

For the way that the targets are set by Member States, in the view of the MAC, it is necessary to account for the specificities of each Member State, such as waste generated and climate. Therefore, Option T2 (target level differentiated by Member State) or Option T3 (collective target on EU level – based on MS contributions), depending on an implementation that respects these differences, could be appropriate.

As for Step 2, the MAC's membership generally supports Option 3 (advanced - to reduce food waste in the EU by 40-50%), through a progressive implementation, as long as the conditions of implementation are realistic, including a reasonable timeframe. These will be affected, for example, in the context of the revision of the Regulation on Food Information to Consumers, by new provisions and working practices on the labelling of date marking<sup>3</sup>. A precise definition of “food loss” would also be important when determining the target. On the other hand, the Spanish retail sector for fish and frozen products support Option 2 (medium – to reduce food waste in the EU by 25-35%).

---

<sup>3</sup> On 23 February 2021, the MAC adopted advice on the Revision of the EU Regulation on the Provision of Food Information to Consumers: <https://marketac.eu/revision-of-food-information-to-consumers-regulation/>.

#### **4. Likely economic impacts**

The MAC generally agrees with the likely economic impacts identified in the Inception Impact Assessment. A positive economic return for all parts of the fishery and aquaculture value chain is expected. For primary producers, the impact would either be not significant or positive, since any decrease in the demand quantities could be offset by demand for sustainable products and better quality food with higher value. For food processors and manufacturers, besides the above-mentioned issue of the definition of “food loss” that can translate into varying additional costs, it is also necessary to account for the costs of products that are not sold by the retailers and are returned to the processors.

#### **5. Likely social impacts**

The MAC generally agrees with the likely economic impacts identified in the Inception Impact assessment, particularly positive social impacts from food waste prevention measures, stimulation of more sustainable dietary choices, reduction of feelings of guilt and/or frustration associated with discarding food, and better social cohesion. At the same time, it is necessary to keep in mind that social impacts will depend on the education of the consumers. Consumer education on these aspects is essential. As an example, food loss can be managed at the processing level through specific outlets for different by-products that will be used, such as for fishmeal and fish oil, while it is more difficult to reduce food loss in households. This may imply changes to how a fish product is sold – a filet will produce less loss at household-level than a whole fish. The higher the convenience rate, the better the utilisation of by-products and, therefore, the smaller the percentage of loss.

## **6. Likely environmental impacts**

The MAC generally agrees with the positive likely environmental impacts identified in the Inception Impact Assessment. The recovery of waste, for example the recovery of shellfish waste, can also improve the impact on the life cycle, particularly in terms of carbon sequestration. In the context of environmental impacts, further research on food preservation and conservation should be encouraged. Purchasing food (from the beginning of the value chain) from closer sources and processing food closer to the markets can also have a positive effect. Nevertheless, without knowing the exact plan on reduction of environmental impacts, it is difficult to measure the consequences.

## **7. Likely impacts on simplification and/or administrative burden**

The impacts on simplification and administrative burden will depend significantly on the strictness of the implementation and the level of obligations. As an example, in Spain, legislation on food waste is under development and small operators are expected to be exempted from documenting every step on food waste prevention. At the same time, according to the available information, all operators will likely be expected to develop prevention plans, which can be cumbersome for small operators. Taking into account the role of local, regional and territorial authorities in the collection and reprocessing of waste, these authorities must be involved in the process. Harmonisation of the concept of “food waste” will be essential to ensure simplification and a lower administrative burden.

## **8. Examples of food waste reduction actions**

In the fishery and aquaculture value chain, operators undertake several food waste reduction actions. In many EU markets (e.g., Spain), retailers and fishmongers present and sell to their clients unpacked whole or gutted fish but offer the possibility to have it sliced or prepared at the

same sales point. The by-products created in such operation can be recovered and used to produce fishmeal and fish oil for other food (livestock feed) or non-food (pet feed) purposes. Retailers can also freeze or prepare the product before it becomes a surplus. Small retailers, in some cases, consume a significant amount of product in their own homes and generally donate to vulnerable people in the local community. Price adjustments based on the time at the counter can also take place. For the retail sector, positive examples include the signature of the 2021 Waste Agreement under DG ENV<sup>4</sup>, the collective agreement to meet the Sustainable Development Goals to halve food waste by 2030 via the Consumer Goods Forum<sup>5</sup>, and individual measurable targets set up by companies<sup>6</sup>.

In relation to food loss, there are many initiatives to reduce it, as different new generation programmes and projects based on recycling, new packaging, among others, in the framework of the circular economy are established.

## 9. Recommendations

In the context of the setting of EU-level targets for food waste reduction, the MAC believes that the European Commission should:

- a) Take into account the importance of legislation on food waste for the EU market of fishery and aquaculture products, including through close cooperation between DG SANTE and DG MARE on this matter;
- b) Take into account that the main points of food waste creation are households and HORECA, but that there are varying contributions of food waste generation and reduction

---

<sup>4</sup> [https://www.eurocommerce.eu/media/120522/12\\_wastereport2014.pdf](https://www.eurocommerce.eu/media/120522/12_wastereport2014.pdf)

<sup>5</sup> <https://www.theconsumergoodsforum.com/environmental-sustainability/food-waste/>

<sup>6</sup> <https://www.theconsumergoodsforum.com/environmental-sustainability/food-waste/>

from fishers, aquaculture farmers, seafood processors, traders, and specialised and other retailers;

- c) Establish clear and harmonised definitions of “food waste” and “food loss”;
- d) Proceed with the policy options supported by the membership, as outlined above;
- e) In terms of measurement and data collection, rely on international protocol and guidance, such as the World Resources Institute (WRI)’s Food Loss and Waste protocol<sup>7</sup>, while allowing some flexibility in the data collection;
- f) Considering the relevance of food waste generated in households, continue to undertake actions to raise awareness and to establish good practices amongst the general public;
- g) Take into account the impact of other ongoing policy initiatives, such as the revision of the Regulation on Food Information to Consumers, particularly the new provisions and practices on the labelling of date marking;
- h) Consider amending the current legislation on frozen food, in order to adapt to the new realities of online sales;
- i) Facilitate food donations and transformation into animal feed, while respecting food and feed safety rules, including through the limitation of administrative requirements as well as other policy and fiscal incentives, such as VAT reduction;
- j) Take into account examples of food waste reduction actions undertaken by the operators of the fishery and aquaculture products value chain, as described in section 8;
- k) Promote the development and use of appropriate conservation methods and preservations, including in the context of households and food services.

---

<sup>7</sup> <https://flwprotocol.org/flw-standard/>