

EU have your say

Remarks on proposal for the directive regarding food waste:

Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2008/98/EC on waste

### Summary

The Swedish University of Agricultural Sciences (SLU) supports the EU Commission's initiative regarding the proposal for legally binding EU targets to reduce food waste. SLU also supports the general goal to reduce both the environmental and climate impacts of food systems associated with food waste generation (p. 1).

However, SLU opposes the proposed Option 2 (p. 21-22 and 39-40), i.e., the alternative where:

- Target for primary production – no target %,
- Target for processing and manufacturing – 10%,
- Target for retail and consumption stages – 30%.

Instead, SLU would prefer the most ambitious alternative, Option 3, with an adjustment to 50 % for the primary production stage:

- Target for primary production – 50%,
- Target for processing and manufacturing – 25%,
- Target for retail and consumption stages – 50%.

## General remarks

- SLU considers that it is of great value to have the target at 50 % reduction of food waste for the retail and consumption stages, that is also the only target in line with the SDG Target 12.3.
- SLU regards that it is important with a numerical target for primary production to be able to influence the environmental impact flows in that part of the sector.
- SLU would prefer a 50 % reduction target for primary production.

The reason why SLU would prefer the most ambitious target, is that time is scarce for the transition into a sustainable food system, as the sustainable levels of several of the planetary boundaries has already been transgressed (Richardson et al., 2023), and the food system is considered one of the big contributors. According to the article “*Options for Keeping the Food System within Environmental Limits*” published in *Nature* regarding the options for keeping the food system within environmental limits, the food loss and waste needs to be cut by 75 % by the year 2050 (Springmann et al., 2018). To reach this target, the rate of reduction needs to be high, especially in the beginning, as the easiest steps are implemented first (“the lowest hanging fruits are picked first”). Based on this, the target for 2030 cannot be lower than the proposed 10-25-50 % (Option 3). SLU has furthermore published a study on food waste changes in the Swedish public catering sector, and concluded that cutting the food waste by half by the year 2030 is achievable, given the current situation and declining trends, and provided that the untapped potential in food waste reduction for canteens, that are currently furthest away from the best-performing canteens, is utilized (Malefors et al., 2022).

SLU thinks it is essential to keep the target of 50 % reduction of food waste for the retail and consumption stages, which is also the only target in line with the SDG Target 12.3.

Option 3 is furthermore the only option where primary production has a quantified number, which is necessary for spurring improvements in this part of the sector. SLU has during 2021-2022 participated in the Swedish National Monitoring of food losses in primary production, where some of the conclusions are that this type of monitoring is possible and that the losses were in the range of 5-50 %. In addition to this, SLU has recently published research on losses of beef in Swedish primary production, where these were amounted to 8.5 % of the initial production, with an estimated carbon footprint of 310 000 tons of carbon dioxide equivalents (Strid et al., 2023). In the report *Driven to Waste*, the main conclusion was that global food loss and waste increased from previously estimated 1.3 billion tons to 2.5 billion tons, when losses at primary production was added (WWF, 2021). In a recent study on the potential energy and environmental footprint savings from reducing food loss and waste in Europe, the authors emphasis the global urgency to

address environmental impacts from the food system, especially at farm level and call for a 50 % reduction in pre- and postharvest waste by 2030 (Kwame Osei-Owusu et al., 2023).

SLU therefore would prefer a numerical target for primary production in order to be able to influence the environmental impacting flows in this part of the sector. However, SLU considers a 50 % reduction target for primary production would better support the transformational change into a sustainable food system, than the incremental 10 % suggested in Option 3.

#### References:

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Malefors, Christopher, Ingrid Strid, and Mattias Eriksson, 2022. “Food Waste Changes in the Swedish Public Catering Sector in Relation to Global Reduction Targets.” *Resources, Conservation and Recycling* 185:106463.

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WWF-UK, 2021. “*Driven to waste: The Global Impact of Food Loss and Waste on Farms.*” World Wildlife Foundation, UK.

Kwame Osei-Owusu, Albert, Quentin D. Read, and Marianne Thomsen, 2023. “Potential Energy and Environmental Footprint Savings from Reducing Food Loss and Waste in Europe: A Scenario-Based Multiregional Input–Output Analysis.” *Environ. Sci. Technol.*, 57, 43, 16296–16308

Dean Torleif Härd has, with the authority by the vice chancellor, made a decision regarding this remark after submission from coordinator Linda Ferngren. The content has been composed by Dr Ingrid Strid at the department for Energy and technology.

Torleif Härd

Linda Ferngren