



# **Working document "monitoring of food waste – outline to methodology" – comments received**

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## **Introduction: the purpose of the document**

- 1. To pave the way to agree on scope of obligatory monitoring on food waste from Member States*
- 2. To help address questions and clarify potential problems with monitoring of food waste*



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# General Comments

# Definition

*1. The need for definition*

*2. Exclusion of non-edible parts of food from food waste definition (or at least clear distinction between edible and non-edible parts of food)*

## Scope of the monitoring

- *Issue: The exclusion of agricultural losses (and most of the agricultural waste) from the monitoring – as it may lead to underestimate food losses in agriculture and may negatively impact prevention efforts in agriculture.*
- *Answer: In monitoring established under Waste Framework Directive we have no possibility to go beyond the scope of the base act. Additional monitoring is possible on voluntary basis.*

## Calls for Commission actions

- *Set the targets!*
- *Modify the list of waste – European Waste Catalogue and/or Categories in Waste Statistics Regulation*

## Alignment with other targets and reporting standards

- *Need for alignment with SDG 12.3*
- *Need of alignment with Food Loss and Waste Protocol (FLW Protocol) – developed as global reporting standard.*



# Technical Comments



## **Food waste from primary production and processing and manufacturing**

- *Problem with dual-use crops (food vs feed or industrial uses).*
- *Explain the role of biogas and compost production.*
- *Explain the issue of by-products (in particular in biofuels)*

*Proposed solution: the technical approach could be one of the topic for discussion at the next meeting*

## **Delineation between sectors of the food supply chain**

- *Need for better clarity in delineation between primary production and processing*
- *Use of NACE problematic*
- *Problems with attributing of waste of services sector and municipal waste: how to attribute them to retail, food services and households*
- *where fits logistics?*

## Attribution to food waste per sector

- *Who is responsible in case of food waste generated out of control of entity – e.g.:*
  - Waste from food not bought on-site (in case of food services)
  - Waste resulting from orders cancellation (processing and manufacturing sector)
  - Waste from street cleaning

## Reporting from small entities

- *Reporting from SMEs may be too cumbersome (especially small retail and food services' markets are fragmented)*
- *Answer: the obligatory monitoring will be from Member States, internal organization of monitoring is for them to be decided – can experiences from Waste Statistics Regulation help?*
- *Technical guidelines are present (FUSIONS, FLW Protocol). Are the additional guidelines useful?*

## Food waste via the sewer

*Split comments on need to include food waste going into the sewer*

- It is potentially important route for food waste (and drinks!) and
- Its exclusion may lead to higher proportion of food waste to sewer to get out of scope, but
- It is technically challenging to measure, hence FUSIONS manual not recommends it.

*Our proposal: Discuss it at next sub-group meeting.*

## Food waste and packaging

- *There is general agreement that mass of packaging should not be counted.*
- *For technical reference we should refer to guidance included in the FLW Protocol.*
- *We have no intention to measure rest of foods in the packaging thrown away to packaging waste stream.*

## Compositional analysis

- *There is no other way to analyze food waste within mixed waste – can the analysis be made in a manner which is representative and comparable between Member States?*
- *Frequency?*
- *Quality requirements?*

## Next steps

- *The new document will be prepared before next meeting of the Platform. It may however contain disclaimers as for the issues to be discussed within the legislative process.*