



Slow Food Feedback on the EU Inception Impact Assessment: Proposal for a revision of Directive 2008/98/EC on waste – part on food waste reduction target.

29 October 2021

As a member of the EU Platform on Food Waste and Food Losses, Slow Food welcomes the European Commission's initiative on the setting of EU-level targets for food waste reduction, and strongly recommends that a binding 50% reduction target on food waste and food losses be set for the EU to be reached by 2030, without any further delay.

Slow Food recognizes the central role of food, for our survival in its most basic terms, and in many other areas of our personal and public lives. Food plays a significant role in economic, ecological, social, cultural, and political terms. It has an immense and essential value for our health, wellbeing, and prosperity. Slow Food therefore considers the magnitude of food waste that the EU food system currently generates is unacceptable and must be urgently met with binding targets and regulation beyond voluntary agreements by businesses to fight against food wastage **from farm to fork**.

General comments

❖ The EU must take a “food environments” approach

Relying on “improving knowledge and awareness”, “influencing attitudes and behaviour that lead to food waste”, and “voluntary commitments” will not be enough to address the magnitude of food waste and reach the 50% reduction target by 2030. Instead, the food environment in which consumers make food choices should be better acknowledged as a driver of food waste.

Creating enabling food environments means ensuring that foods, beverages and meals that contribute to sustainable healthy diets (**which includes diets that generate less waste**) are the most available, accessible, affordable, pleasurable and widely promoted (see joint CSO policy brief on Food Environments¹). As stated by the EU's group of chief scientists, binding policies, such as regulation and fiscal measures, tend to be the most effective interventions and must be the main drivers of change to healthy and sustainable food systems operating within planetary boundaries. Voluntary commitments and self-regulatory initiatives should only be seen as complementary drivers and never replace regulation.²

❖ Reducing food waste levels should be tackled through developing short supply chains, providing social, economic, and environmental benefits which need to be assessed

Supporting the development of shorter food supply chains is increasingly demanded by EU citizens, and one of its benefits would be the reduction of food waste that this would entail. The social,

¹ Policy Brief “Food Environments and EU Food Policy: Discovering the role of food environments for sustainable food systems” https://www.slowfood.com/wp-content/uploads/2021/10/Food-Environments-for-SFS_EU-FPC.pdf

² Scientific Advice Mechanism, Group of Chief Scientific Advisors (2020) Towards a sustainable food system. Scientific Opinion Nr. 8. European Commission



environmental, and economic positive impacts of shortening food supply chains should therefore also be assessed in the Commission's Impact Assessment. The EU should support direct marketing channels, strengthen short supply chains and give support to all activities that forge close links between producers and consumers – i.e. that reduce food miles, facilitate interaction between producers and consumers, ensure fair prices for consumers and producers that foster local economies.³

❖ **Binding targets should be set for the entire food supply chain (Option S1)**

Food waste should be addressed holistically, as early as from the farm and all the way to the fork. In this regard, binding targets should be set for the entire food supply chain, to address the food waste occurring at the primary production level and the early stages of the supply chain (option S1), as Slow Food and other NGOs have called for in the past⁴.

Moreover, we recommend that mandatory Member State reporting be extended to include food left unharvested and ploughed back in the fields. According to the WWF's recent report "Driven to waste: the global impact of food loss and waste on farms"⁵, which shows the most comprehensive review of data on primary production food loss and waste to date, about 150 million tons of food is wasted on European farms (14.6% of total production). Currently, there is no data available in the EU on these types of food waste. The Commission and Member States should collect these data and use them as a baseline. This is particularly important to prevent food waste occurring at the retail and manufacturing levels to be displaced to the primary production level.

❖ **Step 2: Comparing the expected environmental, economic, and social costs and benefits of a >50% reduction target**

Given the European Parliament resolution that the 50% target must be reached by 2030, and given the SDG 12.3 to which EU Member States have subscribed, we believe the Commission should assess the impact of a ">50% reduction target". Given the urgency with which we need to act, and the depth of the transformation that is needed to address the environmental, social, and health crises Europe is facing today, **Slow Food believes that a minimum target of 50%** is the only credible way forward to tackle food waste and food losses at European level, the ecological, economic, ethical and cultural costs of which cannot be emphasized enough.

We thank you in advance for considering our comments and remain at your disposal for any question you may have.

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³ Slow Food position paper on Food Losses and Waste https://www.slowfood.com/wp-content/uploads/2021/01/ing-position-paper-foodwaste_compress-1.pdf

⁴ Joint NGO Letter "EC commitment on tackling food waste in the Farm to Fork Strategy" https://foodpolicycoalition.eu/wp-content/uploads/2020/07/NGO-Joint-letter_EC-Commitment-on-Tackling-Food-Waste-in-the-F2F-Strategy.pdf

⁵ WWF report "Driven to waste: the global impact of food loss and waste on farms" https://wwfint.awsassets.panda.org/downloads/wwf_uk_driven_to_waste_the_global_impact_of_food_losses_and_waste_on_farms.pdf