

## DUH public EU consultation response: Food waste – reduction targets

Environmental Action Germany (Deutsche Umwelthilfe e.V. - DUH) strongly welcomes the initiative to propose legally binding targets to reduce food waste in the EU. Concerning the scope of the policy scenario, DUH urgently recommends to promote Option S1, establishing a target covering the whole supply chain from farm-level production to the final consumer. This will be in line with the holistic approach of the farm to fork strategy. Food waste indeed occurs at all stages across the value chain, and a target covering only consumer and retail food waste would exclude most food waste in the EU from the scope of the binding targets and may lead to food waste being shifted from one level to another. Moreover, data availability on food waste and loss at the primary production level needs to be improved. Currently, there is no comprehensive information available in the EU, which however will be necessary to make the correct baseline assumptions.

Regarding the “expression” of the target and “way the targets are set for Member States”, to meet the EU-wide reduction target of at least 50%, a target for member states to reduce their food waste expressed as % compared to the 2020 baseline year could be an acceptable option (Option E1). In addition, options E2 in combination with a T1/3 hybrid can be feasible. This would allow for all MS to have a legally binding target to reduce their FLW to a uniform kg per capita food waste, set at a level to ensure EU-wide 50% FLW reduction by 2030.

With regard to step 2, we strongly recommend for the Commission to model at least a 50 percent reduction target. Taking into account SDG 12.3, according to which the retail and consumer sector worldwide must reduce their food waste by 50% by 2030, it is recommended to choose a corresponding scenario. DUH therefore, suggest for the impact assessment to analyse Option 3, but at a clear benchmark of at least 50 percent instead of modelling a range between 40 – 50 percent. The pre-assessment by the European Commission, stakeholder opinions and current scientific findings already align on the fact that societal impacts of reducing food waste will be largely positive. However, as higher reduction rates may be more difficult to implement and some Member States unclear on how to achieve the target, a feasibility assessment of establishing more ambitious target by 2030 will be a valuable contribution to the current debate.

Lastly, the impact assessment is an import opportunity to assess and compare the most effective measures in order to achieve SDG 12.3 at a sufficient speed. We expect that modelling will show that voluntary commitments will not deliver sufficiently fast reduction results. We therefore recommend to include in the modelling the potential effects of regulation to deliver more ambitious reduction levels. This will provide a better basis for decision at MS level on which actions to choose. The following regulations could be implemented and evaluated, of which some already apply in certain EU member states, but there is a potential for further expansion: food waste measurement obligations for food businesses above a certain size; a binding food waste hierarchy that prescribes how food should be handled in terms of avoiding waste; and strengthened unfair trading practices.

DUH welcomes the fact that the impact from other EU policies, will be assessed as these may indirectly affect food waste generation. To date, the European Commission has not undertaken any evaluations on the impact of the different CAP reforms on the generation of food waste. The continuous use of CAP market intervention measures instead of production limits for example should be the focus here, as well as the overall impact on prices impacting consumption behaviour. Additionally, unfair trading practices, liability rules, tax regulations, and food hygiene regulations should be taken into account.