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Call for Evidence: The EU's contribution to food waste prevention

The National Farmers' Union (NFU) is pleased to submit views and comments to the House of Lord's Call for Evidence on 'The EU's contribution to food waste prevention'. The NFU represents some 55,000 farmer and grower businesses in England and Wales, many of which will be directly impacted by food waste in the supply chain.

Our interest in the Call for Evidence is due to the fact that food waste is costly for the farmer and has a negative impact on the environment. It is vital within this process that a clear distinction is made between waste that arises on farm and waste which arises post-gate. These are different issues and will require a different type of action and policy mechanism to address them.

Please be aware that we are only going to respond to questions relevant to our organisation and our members.

Q1. Why is food waste a significant issue to be tackled, and how does it fit in the EU's wider objectives of sustainable, inclusive and smart growth?

1. Food waste has a negative financial and environmental impact on all aspects of the supply chain. Food security and sustainable intensification are of extreme importance to UK farming and our industry is striving hard to improve in both of these areas. Our approach to these issues must be two-fold; improving productivity whilst improving our resource efficiency and minimising food waste. Reducing levels of food waste across the supply chain has the potential to improve the economic output of farm businesses. The agri-food sector can make a significant contribution to green growth both at the UK and EU level.

2. Food waste is costly for the entire food supply chain and with growing consumer demands and increased challenges of managing volatility. The issue of waste must be tackled for a more efficient, better functioning supply chain where producers are able to find a sustainable system and outlet for all their products.

Q2. How would you define food waste and how feasible is it to monitor such food waste throughout the food chain across the EU?

3. It is clear that food waste occurs throughout the entire supply chain, from inputs, producer, processor, retailer to the final consumer. With pressure on farm incomes and their relatively weak position in the supply chain, farm businesses aim to make the best use of resources. Whilst far from ideal, products which are not sold for human consumption are in some instances returned to the soil or used outside of the traditional human food chain for animal feed or for bio-energy. There is a distinction to be made between this type of food waste which is often caused by retail decisions and the significant avoidable food wastage at both retail and consumer level. Although a lot is known about consumer habits and waste arising's, there is little data or evidence relating to the early stages of the supply chain (producer and processor). Waste that arises on farm, which is returned to land or re-used as animal feed or as a fuel in bio-energy, is difficult to monitor.

Q3. *What do you see as the principal causes of food waste in the EU at each stage of the food supply chain? How significant a role does EU regulation and guidance – across the EU's policies – play in hindering food waste prevention and effective management?*

4. Food waste is caused by a variety of reasons but the most common causes at the farm level are the following:

- Retailer standards (ugly fruit and veg being rejected by supermarkets)
- Over-production due to requirement to fulfil retailer contracts; and
- Harvesting and processing wastage.

5. The above reasons are identified in the [Global Food Losses and Food Waste report](#). Another recently published report '[Food waste within global food systems](#)' states that retailer standards can reject 40% of edible produce which may never reach market and also states the above reasons as some of the typical causes for food waste arisings.

5. The causes for food waste were explored in the NFU's [Catalyst for Change](#) report in 2012. The following supply chain practices are adding cost and stripping value out of the supply chain:

- Cancelled retail orders due to unforeseen changes in consumer demand can result in crops being left un-harvested in the field or destroyed;
- An oversupply of product in the market, caused by growers being offered programmes/contracts to produce more than the market needs;
- A limited number of outlets for imperfect or 'class II' produce, which could be better utilised in processed foods or value ranges;
- Retail product specifications have become a lot higher over time in the pursuit of aesthetic perfection. This unrealistic expectation is resulting in large proportions of British fruit and vegetable crops being destroyed, unharvested or sold as animal feed because they simply 'don't make the grade'. One grower reported that 25% of their apple crop was left unpicked in 2010 due to inadequate size.

6. Improved carcass utilisation is also vital in order to reduce food waste. With increased demand for low cost food, it is imperative that retailers take responsibility for helping to drive consumer demand for other, less in demand products, for example UK consumer demand for breast meat in chicken is high, but retailers could help to drive demand through education of other cuts of the chicken.

7. Food waste at the consumer end of the supply chain also has significant impact. Consumers need to have better access to information regarding how to correctly store food, meal planning and reducing unnecessary packaging. Consumer facing initiatives including the [Love Food Hate Waste](#) campaign led by WRAP have been very effective in this area. The campaign aims to raise awareness of the need to reduce food waste and help consumers take practical action. The impact on consumer waste can also be directly affected by retailers including in-store offers leading to unwanted food and excess packaging on products.

8. As suggested above, actions at retail level in terms of specifications for products can create food waste. Wider supply chain relationships between suppliers and retailers also have an impact on levels of food waste. Whilst at the UK level unfair trading practices in the food supply chain are now dealt with through the Groceries Supply Chain Code of Practice (GSCOP) and the recently appointed Adjudicator, no such mechanism with a regulatory oversight operates at EU level. Reducing food waste partly requires fair dealing in all elements of the supply chain, and farm businesses operating in other EU member states would benefit from a similar system to the UK. The European Commission expect to bring forward initial views on a recent consultation on unfair trading as part of the 'Retail Action Plan' by the end of 2013. This is also being discussed in the Internal Market and Consumer Protection committee chaired by Malcolm Harbour MEP. Supply chain relationships which are fair, equitable and

work in partnership can help to increase efficiencies and reduce food waste across the whole supply chain.

9. Food wastage could be reduced at a farm level through supportive EU policies. For example, access to technologies, such as GM technology, could help develop varieties resistant to drought, extreme temperatures or certain pest which could help improve yields. In addition, ensuring that the agricultural sector has a range of plant protection products available on the market is essential to ensure good crop yield and quality, which can also help reduce wastage. Since the introduction of European regulation 91/414 in 1993 that controlled the authorisation of PPP across Europe the number of products on the market reduced by c.a. 75% the result is that very few options are available to control specific pests (in the widest sense). This increases reliance in major agricultural crops to a small range of actives with the resultant effect that resistance develops, some examples in arable rotations include: Black grass resistance to herbicides, Resistance of *Septoria tritici* to azole fungicides and resistance to pyrethroids in aphids, the result is multiple threats to yield potential and wastage. This is compounded by regulations such as the recent restriction of certain Neonicotinoid compounds on certain crop and uses, this restriction compounds the issue of aphid control which was only effective using these Neonicotinoids. It also makes control of pests such as flea beetle on OSR virtually impossible as they attack the seed and shoot as a result overall yield losses from this restriction on OSR are likely to be 10% on average across the UK and maybe considerably more in certain situations where pest threats are increased.

10. Access to water for irrigation is also vital for the successful production of vegetables. Defra must be mindful that changes such as abstraction reform and the proposed Water Bill do not have a detrimental impact on water access for vegetable producers and then in turn increase the quantity of food waste arisings.

11. Minor/specialist crops in the horticultural sector are also heavily affected because it is costly to generate data for approvals often it relies on the agricultural industry to do this, in other member states this is supported. These crops have a high risk of perishability. ADAS carried out a [study](#) for DEFRA in 2011 on horticultural crops with the introduction of the new pesticide regulation (1107/2009) 'Placing of plant protection products on the market'. This highlighted some useful information on existing gaps in plant protection:

- Weed control of both broad-leaved weeds (£58 million) and grass weeds (£51 million), these generally affect all crops, but the potential for improvement in weed control in strawberries is particularly high at £29 million as it is estimated that in current practice yields could be increased by 15% if better weed control was achievable.
- Botrytis currently causes significant crop losses (£52 million), with strawberries (£33 million), raspberries (£5 million), outdoor lettuce (£5 million) and hardy nursery stock (£4 million) having the greatest potential to increase in value.
- Weevil control is not always very effective. If improved control were achieved there is the potential to increase the gross margin of the 15 horticultural crops assessed by £52 million. Strawberries (£44 million) and hardy nursery stock (£7 million) have the most to gain from improved control.
- Aphids currently cause crop losses amounting to £45 million across the 15 horticultural crops. If improved control was achieved outdoor lettuce (£20 million), carrots (£14 million) and brassicas (£6 million) would receive the greatest benefit from improved control.
- Powdery mildew causes yield losses in a range of crops with a potential value of £37 million. Strawberries (£25 million), hardy nursery stock (£4 million) and tomatoes (£4 million) have the greatest potential to increase production, and therefore gross margin, if improved control could be achieved.
- Slugs and snails affect a number of crops causing an estimated £32 million loss in potential yields. If improved control were achieved strawberries (£20 million), outdoor lettuce (£6 million) and brassicas (£5 million) would see the greatest benefits.

- Downy mildew is not well controlled in all crops, improved control could be worth £22 million for the horticulture sector. Outdoor lettuce (£10 million), tomatoes (£6 million) and onions (£3 million) have the greatest potential to increase in gross margin if better levels of control could be achieved.

Q4. What economic drivers are already in place to prevent food waste? How can EU regulation and guidance amplify those drivers? What further EU policy changes would be desirable? How can such developments be coordinated with efforts at the local, national and international levels?

12. Further EU policy changes is not desirable, what the industry needs is further integration throughout the supply chain. Emphasis needs to be made on the impact retail decisions have on the rest of the supply chain. For example to improve consumer wastage of food, in-store promotions need to be appropriate. Also improving the integration between the various aspects of the supply chain with retailers working closely with their suppliers to reduce waste (through ordering systems and forecasting) would be beneficial.

13. EU incentives, such as those under the [EAFRD](#) could have the potential to invest in agricultural production techniques which would improve crop standards and developing new markets for lower value products such as vegetables and lower value cuts of meat.

Q5. How realistic do you consider the Commission's aspiration to halve food waste by 2020 to be, and how helpful could a binding target be in encouraging Member States to intensify their actions in this area? How could such a target be effectively applied?

14. The NFU do not feel that binding targets are always the most appropriate solution to the problem. Whilst binding targets will force improvements, these improvements may not be in the most important areas of food waste and Member States may go for easy wins instead of tackling the true source of the problem. A voluntary approach with industry buy-in can be just as effective. One such initiative is [The Coultart Commitment](#) led by WRAP (Waste and Resource Action Programme) which aims at improving resource efficiency within the food supply chain and has been signed by all the large UK retailers and many large processors. We feel initiatives like this should be explored further in achieving the targets set. Again, we would emphasise the need for retailers to work closely with their suppliers to help reduce waste arising, in a supportive capacity, through improvements in ordering systems and forecasting.

Q6. What best practice at national, regional and local level can be identified and shared by others? What evidence is there across Member States of the success of a systems approach to food waste prevention, involving interaction throughout the food supply chain?

See the above answer regarding industry initiatives at a national scale.

15. Other national best practices includes supermarkets reducing food waste by sending surplus foodstuffs such as bakery goods to produce animal feeds and donating suitable surplus food to charities. Whilst this work is important, more focus needs to be applied to the start of the food chain with strategies developed to reduce food waste on-farm and during processing. If following the waste management hierarchy correctly the primary aim is to reduce waste in the first instance to that should be the primary aim of the whole supply chain.

16. Improvements in the use of poly-tunnels have also helped increase the yield of soft fruits, added value to the crop and reduce food waste. At a local level producers are using innovative means to reduce food waste with some creating saleable products out of out-of specification vegetable (see link, page 10 of the below report) <http://www.fao.org/docrep/014/mb060e/mb060e00.pdf>.

17. There are a number of initiatives across the EU to tackle food wastage:

- An initiative of the **Austrian farmers' women association** aims to motivate consumers to use leftovers. The **German farmers' association** have joined them in a campaign from the German Ministry for Agriculture and Consumer Protection to avoid food wastage that is called "too good for the garbage bin".
- **The Association of Belgian Horticultural Cooperatives** (which markets more than 80% of fresh fruit and vegetables) created the "**Responsibly Fresh**" label. This collective sustainability quality label goes beyond the typical agricultural practices, and focuses on sustainable development. Producers and producers' cooperatives opt for low impact, biodiversity, proximity and food thrift. This promotes good storage conditions and not allowing any surpluses to go to waste. Every year less than 1% of the fruits and vegetables offered for sale at the auctions are not sold. As a policy there are various options for making good use of any surpluses or residual waste: donation to food banks, animal feed or in the last resort biogas production (See www.responsibly-fresh.com).
- There is a multi-stakeholder project in Spain called "**Food is not wasted, take it**" ("La alimentación no tiene desperdicio, aprovéchala") which intends to reduce waste along the entire food chain by optimizing the use of "surplus" through various means (exchange of information, logistics and transportation recommendations, the relationship between manufacturer and distributor processes, increasing food redistribution – through donations, co-products - and the improvement of the conditions in which it takes place)
- The agri-food co-operatives from Spain and Spanish Federation of Food Banks (FESBAL) signed a collaboration agreement in July 2012 to distribute fruit and vegetables among the neediest people. In parallel, FESBAL also has such agreements with regional federations of co-operatives and directly with many co-operative enterprises. This agreement aims to co-ordinate and optimise the delivery of food from co-operatives to various charities.
- The **Flemish government** is developing policies on social innovations like "**Food Waste watchers**" or innovative collaboration between local food banks and local retail outlets, on food service waste in government facilities and on coherence between all departments including agriculture, economy and innovation, environment, education, culture/youth/sports, food safety, and waste authorities.

Q8. *What additional research and innovation would be helpful to support the development of food waste prevention and management policy? Are there any innovative approaches to communication that could assist with the prevention of food waste?*

See previous response to question 3 for research suggestions.

18. Improvement in forecasting of demand throughout the supply chain is key to helping reduce food waste. We also need to be mindful that extreme weather events can cause large unforeseen food wastage due to damaged crops and ruined harvests. Specific examples of innovative approaches include Unilever's '[Wise up on waste](#)' mobile app designed to help chefs and caterers identify and reduce avoidable food waste. Also Tesco have developed a social purpose strategy ([Tesco and Society](#)) addressing food promotions, shelf life and volume of food the consumer buys.

19. A comprehensive list of research priorities have also been suggested in the recently published report entitled '[Food waste within global food systems](#)' report. The priorities cover the whole supply chain and aim to boost the capability of UK food production.