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Food Waste  
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DG SANTE  
European Commission  
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20 January 2017

**Re: Draft methodology for the monitoring of food waste**

Dear Sir/Madam,

BEUC, the European Consumer Organisation, welcomes the opportunity to comment on the European Commission's draft outline for a methodology to quantify and monitor food waste.

Consumer organisations across Europe are committed to contributing to the fight against food waste through the many activities they carry out, ranging from consumer awareness-raising campaigns, through advocacy work, to the publication of dedicated articles online and/or in their printed magazines.

- **Tackling food waste from farm to fork**

Food waste is a complex issue. While consumers do have a role to play in reducing food waste, they tend to get a little more than their fair share of the blame for it. It is our view that **any food waste reduction target(s) should apply from farm to fork**, instead of focusing only on retailers and households. The report<sup>1</sup> by the European Court of Auditors evaluating the European Commission's policy on food waste, which was published just a few days ago, also points to the need to adopt a more holistic approach looking at all stages of the food supply chain, and notably to the primary production level.

But as long as food 'losses' (such as crops ploughed in/not harvested, misshapen produce which is discarded, etc.) are not legally regarded as food 'waste', we are concerned they will remain excluded from monitoring. Not only does this contribute to **distorting the picture of where and how much food is wasted** along the food supply chain, but it also means that any agreed reduction target will not apply to the farm level – regardless of how substantially it contributes to food waste.

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<sup>1</sup> [http://www.eca.europa.eu/Lists/ECADocuments/SR16\\_34/SR\\_FOOD\\_WASTE\\_EN.pdf](http://www.eca.europa.eu/Lists/ECADocuments/SR16_34/SR_FOOD_WASTE_EN.pdf)

A fairly important amount of perfectly edible food never reaches supermarkets' shelves (e.g. wonky vegetables). This food waste is not part of the statistics and, more often than not, consumers are the ones to be blamed for it on the ground they "do not want" these products. But many consumers are simply unaware of this situation as such food never makes it to the market. Other factors such as quality standards, the power balance between farmers and other operators down the food supply chain, etc. play an important role.

Against this background, we believe **it is essential that both food losses and food waste are measured and monitored** at all stages of the food supply chain and that any **food waste reduction target applies from farm to fork**.

- **Household food waste**

The collection of data on household food waste is complex and challenging. In addition to an approach based on compositional analysis as suggested in the draft methodology, there could possibly be some merit in also including consumer surveys (food waste records) – provided this has been tested for reliability.

Another issue is the fact that the FUSIONS<sup>2</sup> project defines 'food waste' as including both **edible and inedible parts** of food. While this can be sensible from a resource-efficiency and circular economy standpoint at processing/manufacturing levels, we are **unsure of the relevance when it comes to households** – and even retail, restaurants and food services. Some countries, such as Norway<sup>3</sup>, do not include inedible food parts (e.g. bones, potato and orange peels, etc.) under the definition of 'food waste'.

When measuring and monitoring household food waste, we insist that **a distinction has to be made between edible and non-edible parts of food**. This is all the more important that consumers are generally pinpointed as the main culprit for food waste. As we trust that no one can expect them to eat fruit peels and meat bones, it **would be unfair** to treat both the edible and inedible fractions of consumer food waste the same way.

We are also wary of **potential unwanted consequences** if inedible food parts discarded by consumers would be counted as household waste. For instance, should consumers no longer peel their fruits and vegetables at home but rather buy ready-made meals and pre-cut vegetables? We doubt this would be beneficial for their health and budget. The same is true for restaurants. In Switzerland, some measures meant to reduce food waste in restaurants have resulted in fewer fresh ingredients being used as opposed to more processed, pre-prepared ingredients. In our view, **the inedible fraction of food waste should essentially be monitored at production and processing level**, not at consumer and restaurants levels.

Eventually, while tackling food waste is essential, it is also vital that consumers do not end up being penalised by any action taken to address this issue. In particular, **they must remain free to choose and eat healthy, tasty food according to their own preferences**.

We thank you very much in advance for taking our comments into consideration and remain at your disposal for discussing the above further.

Yours sincerely,

Camille Perrin  
Senior Food Policy Officer

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<sup>2</sup> <http://www.eu-fusions.org/>

<sup>3</sup> <http://matsvinn.no/wp-content/uploads/2016/06/ForMat-rapport-2015-translated.pdf>