

SUBMISSION BY THE SOCIETY FOR THE ENVIRONMENT, SOCENV, TO  
THE HOUSE OF COMMONS COMMITTEE ON  
ENVIRONMENT, FOOD, AND RURAL AFFAIRS  
INQUIRY INTO FOOD WASTE

**Introduction**

- 1 We describe the Society at the end of this submission. We address the strategic issues raised by the Inquiry which affect all of our Member Bodies. We make comments which are relevant to the Devolved Administrations as much as they are to England.
- 2 The Inquiry did not include farming and food processing but we believe you cannot discuss food waste without recognising the contributions and inter-relationships of these. Our submission focuses on food waste but also offers comments on farming and processing.
- 3 The Committee must note that much of the regulation of food waste has its origins in that arising from the EU and will be affected by Brexit and the transposition of legislation.
- 4 Agriculture is a creator and recipient of food waste and hence we submit that it will of value to compare and link the responses to this Inquiry to that of the EFRA Committee on the future of the natural environment after Brexit, with a focus on agriculture. We have made a submission to this Inquiry as well. In this, we set out our framework for dealing with the impact of Brexit on the environment. We submit that this best way forward is to base our future approach on area based natural resources management. We believe that this is also the right way forward for dealing with food waste and to say space in this submission, we include a link to the EFRA Committee submission on our website which may be of interest and value. <http://www.socenv.org.uk/news/foodwaste>

**Summary**

- 5 Food waste incorporates the whole food supply chain; from production in agriculture to the end consumer.
- 6 The Society calls for both a regulatory and cultural approach to the reduction of food waste.
- 7 On leaving the European Union the UK must take the opportunity to consolidate and enhance the effectiveness of legislation surrounding food waste. Regulation should produce the desired outcomes, not hinder them.
- 8 Food waste behaviour change should be encouraged at all levels; producers, businesses, consumers, national and local government.
- 9 Recycling should be standardised across the UK, with all Councils offering the same services.
- 10 Improving communications across all levels would contribute considerably to culture change.

- 11 Unavoidable food waste should be used beneficially with its management an integral part of the green circular economy embedded in area based natural resources management. We make several specific recommendations to aid this approach.
- 12 We have made examples of food waste management in the devolved regions and Europe which would be effective in England and devolved regions available to the inquiry though our website at <http://www.socenv.org.uk/news/foodwaste>. The expansion of pilots to the UK, and England from the devolved regions, would provide proof of concept and evidence for uptake of schemes.

**The Relationship of Culture and Regulation**

- 13 It is crucial that our Nations accept the notion that minimisation and beneficial usage of waste is part of a green circular economy.
- 14 The Society is of a view that food waste must be managed with effective, efficient regulation, but it cannot be managed by regulation alone. It is also about voluntary and personal actions. Consumer and corporate behaviour and culture change must be a part of the solution.
- 15 Although there is a boundary between regulation and behaviour, both contribute to the overall delivery of sustainability, which includes food management. There are concerns about where that boundary is set. Regulation and good behaviour both need sound evidence in support, but are presented and communicated in different ways.
- 16 If the boundary moves away from State regulation, everyone must all understand why; it might be a different way of delivering the same aspiration or it could be can be a lowering of standards or stopping regulation of activity completely. A good example of how the State can decide that good behaviour can be a companion in delivery, is the notion of self-regulation or self-monitoring (such as the role of ISO 9001 or 14001 in place of direct regulation), and we must act responsibly in embracing that opportunity.
- 17 Culture can determine where the boundary is set. Politicians and policy makers can be susceptible to changes in culture. For example, mainstream politics in Wales has attempted to reflect the growing greenness in community attitudes. Culture change is an important aspect in the reduction of food waste.
- 18 The Society has sought to summarise the roles of the state and individuals in Figure 1 below

<b>Individual/Organisation</b>	<b>State</b>
Good behaviour	Direct Regulation E.g. Licencing
Working together in NGOs	

E.g. providing advice, awareness campaigns setting good examples	Regulation which affects behaviour E.g. taxation, Codes of Practice, Statutory targets
Providing sound evidence to the State	
Recognising competence and good practice.	Initiatives which seek to influence behaviour E.g. education, awareness campaigns

FIGURE 1: DIFFERENT CONTRIBUTIONS TO DELIVERY OF ENVIRONMENTAL ASPIRATIONS AND THE MANAGEMENT OF FOOD WASTE

- 19 The Society recognises the need for effective regulation and appropriate behaviour with its celebration of World Environment Day noting that that ‘we cannot be green by regulation alone’.

### **So What Are Some of the Principal Issues?**

#### **Legislation**

- 20 There is a variety of legislation covering food wastes, either directly or indirectly. The Society submits that there would be merit in doing an audit and review of all such legislation with the possibility of consolidation. The transposition of legislation into a purely UK base gives the Government an opportunity to consider this.
- 21 There is a concern being expressed at the moment about deregulation. The 'red tape challenge' and many of the negative comments in the referendum debates were about bureaucracy; our community does not want extensive bureaucracy associated with its regulation. It is the associated bureaucracy, rather than regulatory focus, which is often the cause of criticism. In fact, inefficient delivery processes can actually thwart outcomes. There is a need to distinguish between processes and outcomes. Getting rid of 'red tape' is not the same issue as deregulation. However, the Society is anxious that any changes must guard against the reduction of aspiration in outcomes.

#### **Communication**

- 22 Language is critical and first of which is language communications must no longer talk about food waste and need to consider the concept of not wasting food in the sense of good husbandry; unused food should not be considered a waste. Brexit offers the UK an opportunity to make its own determination of 'when is a waste not a waste'? 'Waste' in a lay person's mind is a very negative concept. Perhaps recycled food or some other more positive description would be better.

- 23 Influencing culture is important. There has to be an effort to raise public awareness in the same way that other issues, such as smoking, litter, and drink driving. Currently, TV programming on food waste is encouraging behaviour change are having positive effects but there is much more to be done.
- 24 The behaviour of local authorities can transmit unhelpful subliminal messages. For example, in the frequency of collection; the tone of notices or even charging extra fees. We know from personal experience that there is uncertainty in ordinary people's minds about whether it is alright to put food waste in with other green wastes. Communication from local authorities needs to be clear.
- 25 There is also the outstanding issue of the different forms of domestic waste segregation, including different forms and colours of bins. A standardised approach to this would be a great benefit in helping to reduce confusion. This should be coupled with uniform advice to be distributed on what to do with waste. This could include packaging labelled packaging, as an example. The Society supports ongoing efforts, but recognises that asset inertia and costs may make this a slow process.

### **Responses to the Specific Questions Posed**

#### **What is the economic, environmental and social impact of food waste in England?**

- 26 With our broader vision the Society urges the Committee to consider the concept of environmental foot print. There is concern on the resource intensive nature of current food production. So when that food is wasted it is of a greater concern. There are then further environmental consequences when dealing with that waste. The natural resources to produce, manufacture and transport the initial food are key, as well as the required resources used to handle the waste produced. In simple terms it is an 'ecosystem disservice' and reduces the value of our natural capital.
- 27 We know from various reports, such as that produced by the Waste and Resources Action Programme (WRAP), that a third of domestic food is thrown away In London 900,000 tonnes of food are wasted every year of which 60% is avoidable. We have no readily available information on the quantity of crops and food wasted in other parts of the 'food chain'. But on the basis of the concept of environmental footprint, the further along the total food supply chain wastage occurs, the higher will be the natural resources impact overhead.

#### **What measures could be most effective in reducing food waste by farmers?**

- 28 Farmers run small margins operating in difficult markets. We have provided a few examples of how farmers fit into the circular economy and how retailers can utilise farm produce better. A key issue being non-compliant although edible outputs which are wasted instead of sold. A reduction in supermarket standards could lead to a reduction of waste and increase in turnover for farmers.

- 29 Projects, such as the Gleaning Network, should be encouraged. In this scheme, farmers allow volunteers to collect fruit and vegetables from farms that would otherwise go to waste, which is then donated to food banks and other such initiatives. Promotion of this kind of solution, as well as 'Pick Your Own' events, can allow for farmers to reduce food waste and redirect food to good causes or recoup potentially lost revenue. We would like to see support and investment into such schemes.
- 30 Food waste in agriculture is not just caused by consumers and retailers. Large scale and mechanised agriculture can lead to produce not being harvested due to technical reasons (2% of produce is left uncollected in mechanised agriculture) and food that is left unharvested is uneconomical to collect by hand. Whilst gleaning is one solution to this, we also encourage the continued support of agricultural research, innovation and engineering to help reduce this problem and find solutions.
- 31 We also encourage better guidance to farmers and the further sharing of knowledge between agricultural professionals. Bad planning can be responsible for crops being unharvested and we would like to see best agricultural and environmental practice shared and implemented as widely as possible.

**What measures could be most effective in reducing food waste by processors?**

- 32 Processors create 4.9Mt waste/year. Unacceptable but inevitable wastage can occur for many reasons. There is natural wastage such as vegetable wastage; there may be fault in the product line such as soured milks or lack of consumer demand may lead to retailers and processors having unwanted products.
- 33 The unwanted products may be treated and distributed by the processors themselves, but are generally dealt with by specialised contractors, who employ a variety of technique, particularly, anaerobic digestion, composting or even incineration and heat recovery. This is similar to how water companies process sewage sludge, particularly with its conversion to bio solids and their use in agriculture. There may be an opportunity in the economic regulation of water companies to encourage co-management of sewage sludge and food waste. The rules covering recycling of treated products need to be reviewed to encourage recycling whilst protecting the environment, land and natural resources. Leaving the EU may give Government the opportunity to do this.
- 34 A further connection between food waste and water services is that food production can have a very high impact on sewerage and sewage treatment systems. For example, milk discharged into sewers can have devastating impact on the biological sewage treatment processes. There may well be scope for water companies to be even more active in helping food processors reduce the food waste discharged to sewers. In May WRAP estimated that this kind of waste amounted to 0.2 Mt/yr.

**What measures could be most effective in reducing food waste from retailers?**

35 The Society commends the efforts made by supermarkets to ensure that unsold food is passed on in useful ways. For example, the Society encourages charity initiatives such as that by Tesco with Fair Share and Food Cloud and the strategy setting out potential ways of reducing food waste in the UK produced by Unilever and environmental communication charity Hubbub.

36 The Joint Ambition for a Zero Food Waste Britain, launched on 22 August with the support of resources charity WRAP, was developed following a consultation with 240 organisations and a poll with more than 2,000 households.

It has five principles, which cover more than just waste by retailers

- Collaboration between organisations from all sectors is essential to reducing household food waste.
- Communication should demonstrate the value of food, ensuring as much as possible is eaten.
- Awareness needs to be built on the wider environmental, social and financial impact of food.
- Skills and knowledge need to be built so people get maximum value from food.
- Consistency in food waste collection systems is needed across the UK.

This will contribute to WRAP's food waste targets and delivery programmes within its industry-wide Courtauld Commitment. We are sure that WRAP will; submit its food\_waste recycling\_plan for England published in July.

37 We would discourage supermarkets dictating the specification of crops which leads to wastage of non-compliant but edible outputs in agriculture. We would promote the use of non-standard farm products, especially fruit and vegetables, to reduce wastage of crops on farms. This should be an integral part of the Fruit and Veg Pledge which was concluded between the sector and the NFU, and included, for example in the initiatives by Lidl. These products can be marketed differently, donated or used in other processing. The Society recommends that a government backed scheme regarding non-standard but edible produce, with recognisable and effective branding, should be adopted by all supermarkets and who can then compete within that generic brand. This would be better from a consumers' perspective.

**What measures could be most effective in reducing food waste from hospitality including hotels, restaurants cafes etc.?**

38 All that we have said about prudence in managing food and waste, and indeed we say subsequently for domestic consumers, applies to this sector. Pilots in Scotland produced a reduction in food waste by reducing plate sizes, cooking buffets to demand, better use of trimming and unused items and better training. Encouraging consumer behaviour change to encourage the taking home of leftover food has also produced positive results, including an increase in sales.

39 We would also like to highlight the issue surrounding sustainable menu choice. Menu selection can be crucial in cutting waste and the Society is of a view that there could be improvement in current guidance on food wastage to the smaller corporate hospitality entities in this sector regarding sustainable menu.

40 An increase in uptake of ISO 2012.1 would help combat food waste in the event industry and large scale events, such as concerts, conferences and music festivals.

41 Water companies should be able to charge for sink disposal units used by businesses as they do for trade effluents discharged to sewers.

**What measures could be most effective in reducing food waste from domestic consumers?**

42 There is a role, as we explained before, in better communications in all its guises. So, for example, the combination of the 'buy one get one free' concept with sometimes inexplicable relationships of sell by and consume by dates, does seem to encourage food wastage by over-purchasing and worries about the quality of stored food. We consider that there is scope for a review of these practices and for a voluntary change by retailers. Consumers need to be better informed about recycling and local authorities must play a role in this, as we described in the section on communication.

43 We urge the Government to carry on the initiatives by the previous Government on standardisation of collection bin systems. The standard system could then be used in a simple coding system to mark the destination of all wasted materials. There is a recycling inequality across the UK.

44 We commend the Joint Ambition for a Zero Waste Britain and other communications initiatives such the EU funded London project, Transforming City Food Habits for Life (Trifocal), this month by Resource London, a partnership between WRAP and the London Waste and Recycling Board (LWARB) alongside Groundwork London. It will act as a test bed for other European cities and should continue after we leave the EU. The communications campaign will target householders, hospitality and food businesses, local communities and schools using a range of communications approaches, including events, advertising and direct engagement with residents. It will use on existing materials and research including waste authority data on food waste recycling, good practice guidance and communications materials produced as part of WRAP's consumer campaigns such as Waste. The Society will be pleased to assist in any way that it can.

**What measures could be most effective in improving the role of local authorities?**

45 We have referred to how we think that local authorities can contribute. But we suggest that better tactical and strategic co-operation between these authorities and the environment agencies would be beneficial. We support the use of statutory targets.

**How effective are existing voluntary initiatives in England and is there a need for legislation?**

46 Most voluntary initiatives in England are based around food banks or free kitchens aimed at vulnerable or low income people. These usually operate receiving donated stock from businesses and passing it on. There is little in terms of government funding.

47 We have recommended to the EAC in its Inquiry on the Impact of the Treasury on sustainability that environmental taxation and incentive systems needs a radical overhaul. We submit to this Inquiry that the management of food waste is an ideal candidate for change – not as an income generating source for Government, although any income should be hypothecated, but as instruments of changing behaviours be they corporate or personal.

**What are the comparative approaches to reducing and managing food waste in the devolved nations, and across Europe?**

48 The Society has access to information which in itself would exceed the size limit of the return to the Inquiry. It has therefore prepared a Supplement which is on its website and which it will update

**About The Society for the Environment**

The Society is a partnership of 24 professional bodies representing individuals practicing in environmental and natural resources management ranging from chemists and engineers to ecologists and biologists, from front delivery to the very highest levels of leadership. We have access to some 500,000 individual members. Our Royal Charter provides us with the responsibility to oversee the award of the status of Chartered Environmentalist of which there are over 7,000.

SEPTEMBER 2016