

FDF's Response to FISS Report on Water

Recommendation 1 – Subject to a satisfactory return rate from operators (as water use is currently a voluntary parameter for annual reporting purposes) Defra and other stakeholders should use the annual IPPC data on water usage collected in 2006 and collated in 2007 as a baseline from which to monitor the overall progress of larger food manufacturing companies towards targets for reducing water use.

In the absence of other suitable sources of information FDF supports this approach to monitoring the overall progress towards industry targets for reducing water use.

Recommendation 2 – If more detailed data is required, Integrated Pollution Prevention Control (IPPC) data could be supplemented by sub-sector specific data (for example from trade associations) and by data from a representative sample of small and medium sized enterprises (SMEs), recruited voluntarily through trade associations, using a simple questionnaire of the type outlined in paragraph 23.

FDF will be exploring this approach.

Recommendation 3 – Defra, acting in liaison with stakeholders, should undertake further work with the food retail and service sub-sectors in order to establish a) where the principal uses of water by the sub-sectors occur, b) what opportunities for reducing water use by the sub-sectors exist and c) strategies for reducing water use.

FDF supports this recommendation to help provide a comprehensive view of water use within sectors covered by FISS.

Recommendation 4 – The KPI relating to the number of site visits should be replaced by a measure of the practical achievements of the visits. Success should be measured on the quality criteria developed by Envirowise and the Carbon Trust should consider whether joint site visits, in collaboration with trade associations where appropriate, might be a positive step forward.

FDF supports this recommendation.

Recommendation 5 – Defra and Envirowise should explore the benefits of establishing a high-level commitment between Envirowise and larger food companies with a view to reducing water usage.

FDF supports this recommendation.

Recommendation 6 – The Environment Agency (EA) should collate, and publish electronically, the annual IPPC data on water use by food manufacturing sites from the 2006 data so that it may be used for monitoring progress.

FDF supports this recommendation.

Recommendation 7 – AEA Technology (AEAT) have identified potential scope for savings in the areas of meat processing, fruit and vegetables, and non-alcoholic beverage manufacture. These sectors should investigate this further, working with Envirowise to establish if the identification of these sectors is correct and, if so, how best practice can be more widely applied.

FDF supports this recommendation and is happy to work with Envirowise to progress it.

Recommendation 8 – Defra should discuss with the Food Standards Agency and trade associations whether, having regard to the over-riding need for food hygiene, the potential for re-use and recycling of water is being fully exploited.

FDF fully supports this recommendation.

Recommendation 9 – With regard to the use of recycled water, sites should conduct a risk analysis based on Hazard Analysis Critical Control Point principles and, where appropriate seek certification at both environmental management (ISO 14001) and food safety (ISO 22000) levels.

FDF supports this recommendation.

Recommendation 10 – The food industry should adopt an overall water reduction target of 20% by 2020 against a 2007 baseline, excluding water that forms part or all of the product.

FDF supports this recommendation and calls upon Defra to establish robust and comprehensive means to collect water use data to enable monitoring of progress towards this target.