

FDF's Response to FISS Report on Waste

Recommendation 1 – The Integrated Pollution Prevention Control (IPPC) annual Pollution Inventory (PI) data for 2006, collated and aggregated in 2007, should be used as the baseline for monitoring the progress that large operators are making against the FISS waste targets.

FDF supports this recommendation.

Recommendation 2 – A modest investment in human resources at the Environment Agency (EA) should be made to allow for administrative changes to be made to existing and new food and drink IPPC permits, requiring licensed installations to report separately on their food waste arisings.

FDF supports this recommendation.

Recommendation 3 – The Group considers that any further data collection measures for non Integrated Pollution Prevention Control (IPPC) installations should be voluntary rather than regulatory, use a simple standard format, should be consistent with existing systems such as IPPC reporting and should include a representative range of small and medium sized enterprises (SMEs) not covered under the IPPC Directive.

FDF supports the need to collect data from non PPC installations, particularly SMEs and that this should be done on a voluntary basis. However we should not underestimate the challenge of ensuring uptake of this approach, and would therefore underline the importance of taking a simplified approach.

Recommendation 4 – Senior management in the food manufacturing industry should make a collective commitment to monitor their waste streams with a view to reducing them.

Large companies are already voluntarily monitoring their waste streams and many report publicly too. FDF is actively encouraging other members to do the same.

Recommendation 5 – The reference to tobacco in the first Key Performance Indicator (KPI) is irrelevant and should be deleted.

FDF supports this recommendation.

Recommendation 6 – Defra and the food service sector should work together in order to establish a) where the principal waste arisings occur, b) what opportunities for reducing waste arisings in the sub-sector exist and c) a process for reducing waste as the sector's contribution to the FISS.

As food service is a key part of the industry FDF supports this recommendation which might also be taken forward in conjunction with Wrap.

Recommendation 7 – Food industry companies should work towards the food and packaging waste reduction targets in the Courtauld Commitment as a KPI.

FDF supports this recommendation; FDF is also actively encouraging its members to sign up to the Courtauld Commitment.

Recommendation 8 – The fourth waste KPI in the FISS should be amended to read “outcomes arising from the take-up of free support to the food industry that is available from Envirowise, WRAP and other support organisations in each of the next three years.

FDF supports this recommendation.

Recommendation 9 – To improve efficiency and effectiveness and encourage uptake of advice and support, Envirowise and WRAP should work closely together to ensure effective take up of services, such as resource efficiency visits and the innovation fund, by the food industry.

FDF supports this recommendation.

Recommendation 10 – Defra should consult stakeholders on a protocol for assessing the impact of the food industry's actions or interventions on the levels of consumers' food and food packaging waste with a view to establishing a KPI.

Although FDF supports this recommendation more consideration should be given as to how this might evolve. For example it might be appropriate for information to be provided by WRAP based on an assessment of the actions taken by signatories to the Courtauld Commitment.

Recommendation 11 – Companies should seek to improve the efficiency of their food processing, ordering and waste management systems with a view to minimising the production of wastes.

FDF supports this recommendation. Improving efficiency of order management will also require commitment from retailers to resolve especially regarding promotions and new products.

Recommendation 12 – Retailers and suppliers should work towards ending the take back system based on arbitrary remaining shelf life values and move to a system based on the sales potential of the product.

FDF strongly supports this recommendation although there will need to be extensive dialogue between manufacturers and retailers to bring about this change.

Recommendation 13 – Stakeholders should take joint action to address the problem of consumer confusion over date labelling.

FDF supports this recommendation. This confusion has been highlighted in earlier surveys carried out by the FSA whom FDF considers should take forward this recommendation.

Recommendation 14 – Food companies, retailers and local authorities should seek opportunities to combine waste streams of the same kind to provide a critical mass that enables waste management companies to invest in new waste treatment infrastructure.

FDF strongly supports this recommendation. In parallel with this we also need to build a better national picture of current and planned waste recovery infrastructure so as to identify future needs. This needs to involve organisations such as Defra, the EA, NISP and Wrap.

Recommendation 15 – Industry and research funders should use the matrix developed by AEA Technology (AEAT) for mapping opportunities for waste reduction, together with data on the magnitude of potential savings as it becomes available, as a tool to help assess where to place further research and resources.

FDF supports this recommendation.

Recommendation 16 – The food industry should adopt the waste minimisation practices listed: In addition to the potential savings from moving to best in class in packaging, the Group identified the following best practice opportunities for minimising the food manufacturing industry's own wastes:

- economies in the use of inputs;
- reducing product losses e.g. by process optimisation;
- better matching of production to user needs e.g. improving the transparency of supply chains and optimising forecasting and stock control (inventory management) (Annex 2); and
- identifying those product categories or products which generate the most waste in the food supply chain and targeting remedial action accordingly;

FDF supports adoption of these practices although as mentioned in our response to Recommendation 11, point iii) will also require commitment from the retail sector to resolve. FDF will encourage members to look at the feasibility of adopting the WRAP “best in class” database where appropriate.

Recommendation 17 – The Government should investigate the scope for introducing fiscal incentives such as Enhanced Capital Allowances (ECAs) to help promote industry investment in recycling infrastructure.

FDF supports this recommendation but any scheme will need to be kept simple to ensure uptake. Also needs to be born in mind that ECAs may not always be the right mechanism. In general fiscal incentives must be available to help transitional activities such as provision of infrastructure and their uptake open to all businesses and support agencies.

Recommendation 18 – The food industry should increase its efforts to divert waste from landfill by waste minimisation, recycling and the beneficial use of wastes.

FDF supports this recommendation although would point out that many members are already taking these actions.

Recommendation 19 – FISS partners should work together to facilitate the uptake by the food industry of the technological best practice opportunities identified in paragraphs 38 to 42 inclusive of the report.

Whilst FDF supports FISS partners doing this such ‘opportunities’ should also be open to challenge as newer technologies emerge and more LCA data emerges although. Other actors need to be involved as well e.g. the waste management industry and the best practice organisations such as Envirowise, Wrap and NISP. Also FDF would stress again the need to develop a national plan as per our comments on Recommendation 14.

Recommendation 20 – Defra should investigate the concept of a Waste Trading Scheme for industry drawing on experiences from national and international emissions trading and the local authority Landfill Allowance Trading Scheme (LATS) to incentivise companies into best practice.

FDF supports further research into developing such a scheme and how it might work.

Recommendation 21 – Defra should work with stakeholders to evaluate the potential for the development of innovation roadmaps and demonstrator projects that can create a step change in waste reduction in the food manufacturing industry.

FDF supports this recommendation

Recommendation 22 – The food industry should consider proposing the research areas suggested in paragraph 44 of this report as collaborative LINK-type projects.

FDF supports. Our comments in response to Recommendations 11,12 and 16 are also relevant to point v) of paragraph 44.

Recommendation 23 – The Group considers that a realistic target for the food manufacturing industry to adopt is to reduce its food and packaging wastes by 3% a year over 5 years from a 2006 baseline.

FDF supports this recommendation and is actively encouraging its members to work in collaboration with WRAP to help achieve it.

Recommendation 24 – The major retailers should explore whether it is possible to develop and agree a voluntary framework for recording waste arising from stores with a view to using this to identify opportunities for waste reduction.

FDF supports this recommendation. Furthermore FDF considers that there is potential for retailers to develop a national scheme to handle goods better and reduce retail waste through stock damage.

Question 1 – Which of the recommendations do you regard as the most likely to have a positive effect on reducing food waste and food packaging waste produced by the food industry?

In general those actions encourage manufacturers and retailers to work together. More specifically addressing the commercial arrangements between manufacturers and retailers that can give rise to significant waste arisings (as covered by Recommendations 11,12,16 and 22), particularly in terms of improving order forecasting and ending takeback, will have a positive effect, especially in some sectors. Recommendations 4 and 7 are also important in terms of companies measuring their waste arisings and working towards the Courtauld Commitment reduction targets.

Question 2 – Is there any further survey or research work that you consider might be useful in helping to generate step changes reducing food waste and food packaging waste produced by the food industry?

FDF considers that the lack of consistent, credible, accredited environmental life cycle analysis on packaging and alternative options needs to be addressed. This leads to media hype, consumer confusion, and potentially abdication of responsibility. For example is compostable corn starch plastic good or bad? Is recycling always effective? Which one is better? WRAP has a role to play in this area, Defra needs to encourage more openness and sharing of information amongst different parts of the industry.

Question 3 – How can Defra better work with a wide range of sectors (such as small and medium enterprises and the catering sector) on food waste and food packaging waste?

By going through the representative trade bodies and perhaps also local authorities for food service outlets. Defra also needs promulgate clear, simple, action-orientated messages when it engages with industry.

Question 4 – Are there any other issues, that have not been addressed by the report, that you think Defra and the industry should consider?

The development of a national waste management plan as outlined in our response to Recommendation 14. This should encompass clarifying the benefits of waste collection, waste sorting, waste disposal options and in turn achieving consensus on supporting policy. This should no longer be left as a fragmented, delegated burden to local authorities. Some public education will also be needed.