

9 May 2006

FDF comments on the Review of England's Waste Strategy

FDF welcomes the opportunity to respond to this consultation on the proposals for a revised Waste Strategy for England.

The revised Waste Strategy has been discussed in detail by FDF's Environment Committee and comments are presented below.

A brief description of FDF is given at Annex 1.

Detail

Question 17: What are your views on how re-use and re-manufacture could be stimulated further?

FDF notes with interest the references to the European Thematic Strategy on the Prevention and Recycling of Waste within Chapters 1 and 4 of the revised Waste Strategy for England and which has as one of its objectives the simplification and modernising of existing EU legislation, including clarifying definitions.

Consistent with this objective and the need to stimulate further re-use and re-manufacture it is of primary importance for the food industry that the revised Waste Framework Directive clarifies the distinction between waste and non-waste (in particular by-products) in order to provide legal certainty and to remove inconsistent interpretations between Member States. Without amending the legal definition of the term 'waste', the term 'to discard' should be clarified in Article 3 of the proposal, based on the principles developed in recent ECJ jurisprudence (see cases C-9/00, C-416/02 and C-121/03).

Annex 1

The UK Food and Drink Manufacturing Industry

The Food and Drink Federation (FDF) represents the food and drink manufacturing industry, the largest manufacturing sector in the UK, employing over 500,000 people. The industry's annual turnover is over £69bn. It purchases some £11bn worth (about two thirds) of UK agricultural produce and imports a further £21bn worth of food and drink products, of which £46bn is unprocessed and £10bn is lightly processed. UK food and drink exports in 2004 were almost £10bn.

The following Associations are members of the Food and Drink Federation:

ABIM	Association of Bakery Ingredient Manufacturers
ACFM	Association of Cereal Food Manufacturers
BCA	British Coffee Association
BCCCA	Biscuit, Cake, Chocolate and Confectionery Association
BOBMA	British Oats and Barley Millers Association
BSIA	British Starch Industry Association
CFA	Chilled Food Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers' Association
FA	Food Association
FOB	Federation of Bakers
FPA	Food Processors' Association
GPA	General Products Association
ICF	Ice Cream Federation
IDFA	Infant and Dietetic Foods Association
MSA	Margarine and Spreads Association
NABIM	National Association of British and Irish Millers
NACM	National Association of Cider Makers
SB	Sugar Bureau
SIBA	Society of Independent Brewers
SMA	Salt Manufacturers' Association
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SPA	Soya Protein Association
SSA	Seasoning and Spice Association
UKAMBY	UK Association of Manufacturers of Bakers' Yeast
UKTA	UK Tea Association

Within FDF there are the following sectoral organisations:

FF	Frozen Food Group
LDT	Lifestyle and Dietary Trends Group
MG	Meat Group
ORG	Organic Food and Drink Manufacturers' Group
SG	Seafood Group
VEG	Vegetarian and Meat Free Industry Group
YOG	Yoghurt and Chilled Dessert Group