

ECN feedback on the Commission's proposal on food waste reduction targets amending Directive 2008/98/EC on waste

11 October 2023

The European Compost Network ECN welcomes the opportunity to provide feedback on the Commission's public consultation concerning the new proposal for a revised waste framework directive (WFD), focusing on food and textiles aspect.

ECN represents the bio-waste recycling sector and as such the organisation advocates for the sustainable use of the limited resources of the planet and the respect for the organic cycle. Food waste is an important fraction of bio-waste and its generation its mismanagement must be addressed properly. In fact, according to the last revision of the WFD in 2018, EU countries shall set up no later than 31 December 2023 a separate collection system for municipal bio-waste – which includes food residues from households and commercial activities as well – to curb the amount of bio-waste currently sent to incineration and/or landfills. Yet, as the Early Warning Report (EWR) published by the EC in July suggests, separate collection and recycling of bio-waste is still underperformed in many Member States, resulting in the impossibility to reach the targets for recycling set in art. 11 of the WFD. As the EWR indicates, action must also include a focus on the treatment of bio-waste, as this separately collected waste stream represents more than one third of total municipal solid waste. Due to its high share in the total amount of municipal waste generated, a proper management system for bio-waste is a pre-condition if recycling targets are to be achieved.

Missed opportunity for strengthening the targets for food waste recycling

Against this background, and while supporting the inclusion of food waste reduction targets in the various steps of the supply chain from processing/manufacturing to consumption, the ECN would like to highlight two other important targets that are missing in the new Commission's proposal. In fact, abreast with setting targets for the prevention and reduction of food waste, the separate collection and recycling of bio-waste – including food waste –

needs to be increased. Multiple studies have shown that only approximately up to half of the food waste currently generated at consumer level (including households, restaurants and retail) is avoidable, while the rest is composed of inedible parts linked to physical properties of the products, which need to be properly managed and valorised.

Recycling target for non-municipal bio-waste (food waste from industries)

Alongside the reduction of food waste generation in processing and manufacturing by 10% in comparison to the amount generated in 2020, we call for the introduction of a dedicated recycling target addressing non-municipal and industrial food waste as this is not covered under the definition of municipal waste of the Directive 2008/98/EC; still, it provides a significant resource as well for organic soil improvers and fertilisers, biogas and other bio-based applications.

Reduction target of food waste (bio-waste) in residual municipal waste

European and national studies, including those by the ECN, show that biodegradable materials account for 30 - 40% fraction of residual waste in the EU, even in countries with long-standing full enrolment of separate collection. Yet less than 50% of bio-waste is separately collected, with mainly food waste remaining unsorted. This leads to the loss of valuable resources for the production of biogas and bio-waste derived organic fertilisers and soil improvers, which, if properly recycled instead of being incinerated or sent to landfill, would support the EU in achieving Green Deal goals. In this regard, we would like to see from the Commission a commitment for more research on this topic, to find the most appropriate target considering all the different national situations and specificities and adding it next to the more general reduction target of food waste per capita by 30% put forward in the proposal. Meanwhile, Member States shall ensure full implementation of the separate collection and recycling operation for non-avoidable food waste from households, restaurants, food services as well as food production and industry, into compost/digestate products, based on the available information and the ongoing communication campaigns throughout EU territory. To monitor progress in establishing efficient bio-waste collection and treatment systems, the ECN suggests implementing a mandatory monitoring scheme, covering a frequent analysis of bio-waste left in residual waste and contamination in separately collected bio-waste, expanding the scope of the proposed compulsory compositional surveys for textile waste in art. 22d point 6 of the revision. The frequent compositional survey, which shall include a unified EU-wide methodology that also distinguishes garden waste from food waste as bio-waste fractions, would not only facilitate cross-comparisons of the efficacy of various collection systems, but also ideally pave the way for a long-term evaluation of the quantity and share of organic matter lost to the circular economy. The compositional survey is a prerequisite for establishing necessary binding targets, for reducing bio-waste in residual waste and for the overall separate collection rate of generated bio-waste found in municipal solid waste streams.

About the ECN

The ECN is the leading European membership organisation promoting sustainable recycling practices by composting and anaerobic digestion of organic resources and guarding over the quality and safe use of the recovered organic fertilisers and soil improvers. With 67 members from 28 European Countries ECN represents more than 4500 experts and plant operators with more than 45 million tonnes of biological waste treatment capacity.