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## EU Food waste strategy

### FEFAC key recommendations for an optimised feed use of food losses

The EU Commission is expected to present in 2013 a communication on sustainable food, including a chapter on reduction of food waste, which has become a key political objective for the EU, as illustrated in the EU Parliament resolution of 19 January 2012 calling for halving the amount of food waste by 2025. This is a valuable objective and FEFAC is supportive of effective measures to help reducing waste generation in the food chain.

There is a lot of confusion on the actual status of foodstuffs not consumed directly by humans and there is an urgent need for clarification. At each stage of the food chain, part of the food is not directed to human consumption, for different reasons, e.g. not meeting technical standards (too small apples, biscuits the wrong size) or not directly used for human consumption (i.e. oilseed meals being a co-product of the oil industry). Such food losses are not actually waste in the sense that they are reused for other purposes and should therefore be differentiated from actual food wastage at retail or consumer level.

The feed sector has long since helped the food chain to minimize food losses by using part of the food production not directly used by humans. Moreover, feeding animals with food losses enables to convert food products not eligible to food use into food of animal origin. It is therefore essential that any measure put in place by the legislator to minimize food losses along the chain acknowledges that:

- **The uses of food losses for feeding food producing animals should be given priority over any other use but food;**
- **The feed use of food losses does not come in competition with direct food use including recovery of food by food banks;**
- **The food losses destined to feed use are not legally “waste”.**
- **Traceability and safety shall be guaranteed at any stage of the food and feed chain according to the General Food Law principles (Regulation (EC) No 178/2002) and the Feed Hygiene requirements (Regulation ((EC) No 183/2005).**

This last point is essential: a precondition for the feed use of food losses is that traceability and safety are preserved along the chain and the only way to achieve this is to ensure that, at any point of the chain, food losses remain under the scope of the food law (Regulation (EC) No 178/2002). The “non-waste” status of co-products from the food industry such as oilseed meals has been clarified in the past. However, the non-waste status of certain types of food losses, such as biscuits that are the wrong size, which are valuable resources for animal feeding, is not clear at present.

FEFAC asked the “former foodstuffs” processors in charge of converting former foodstuffs into feed to reflect on the necessary steps to secure the non-waste status of former foodstuffs destined to feed and also the actions that should be carried out to improve the present legal framework for the collection, processing and feed use of former foodstuffs and the development of good manufacturing practices.

The attached reflection document developed by these former foodstuffs processors provides an overview of the specific activity of collection of so-called former foodstuffs for feed use, the legal context and the economic and legal bottlenecks for an even larger reuse of these products in feed, thus contributing further to the reduction of food losses along the chain.