

HOTREC position paper on the EU proposal for Food Waste Reduction Targets October 2023

Executive Summary

HOTREC is actively addressing the issue of food waste, by encouraging and helping its members to decrease food waste. On 5th July 2023, the Commission published a proposal to revise the Waste Framework Directive. It introduces binding food waste reduction targets, choosing 2020 as a baseline to set targets and put one joint target for different stages of the food supply chain.

The hospitality industry has always taken its societal responsibility seriously on the matter and is acting to reduce food waste.

Although HOTREC agrees with an integrated food systems approach, it questions the methodology considered as well as (i) the baseline to set targets, (ii) the same target for all Member States, (iii) the mandatory level of reduction, (iv) the method of measuring food waste.

To be effective, HOTREC calls for proportionate food waste prevention strategies at national level considering the impact on SMEs and micro enterprises in hospitality. Tailoring actions to the specific actor involved will be crucial and, considering that the reduction of food waste is expected to reduce demand for food, HOTREC urges careful consideration of the effects on micro-enterprises and SMEs. HOTREC will continue working closely with the EU and its members to identify inefficiencies within in hospitality sector and prevent food waste from occurring in the first place.

Introductory remarks

[HOTREC](#), the European Association of Hotels, Restaurants and Cafés in Europe¹ where 99% of companies are SMEs and 90% micro-enterprises, takes note of the European Commission "[Proposal for a Directive of the European Parliament and of the Council amending Directive 2008/98/EC on waste](#)" (Food Waste Reduction Targets), published on 5th July 2023.

We support the Commission's intention to reduce food losses along production and supply chains, including the hospitality sector. **HOTREC has a longstanding commitment to food waste prevention, encouraging and helping its members to decrease food waste.** HOTREC has been an active member of the [EU Platform on Food Losses & Food Waste](#) since 2016. In 2019 HOTREC co-drafted with the European Commission (EC) [Food Waste Reduction Recommendations for Hospitality](#). In 2021, [HOTREC replied](#) to the EU's [inception impact assessment](#) on a proposal for a revision of the EU [Waste Framework Directive](#).

¹ HOTREC is the umbrella association of Hotels, Restaurants, Bars and Cafés and similar establishments in Europe, which brings together 47 National associations in 36 countries and is the voice of European hospitality. HOTREC's mission is to represent and champion the industry's interests towards the EU and international institutions, foster knowledge sharing and best practices among its members to further promote innovation, and act as a platform of expertise for the hospitality sector. European hospitality counts over 2 million companies in Europe, 99% of them being SMEs (while 90% are micro-enterprises) and employs about 11 million people.

In several countries, HOTREC members are actively engaged in food waste prevention campaigns and activities. For example, France has introduced a training program to help business owners and their employees measure and monitor food waste in restaurants and hotels. Sweden has created a voluntary agreement where actors in the food chain work together to identify the sources of food waste and food losses. The businesses highlighted that an agreement is more flexible than legislation, as it can be more easily adjusted and adapted to changing circumstances. Examples of advice include practical handbooks for restaurants, investigations into food waste origins, staff engagement and training, setting clear goals and subgoals, adapting the portions based on consumption patterns and methods for measuring food waste in public sector establishments (schools, hospitals etc.) governed by authorities. Regarding catering planning, Germany explained the importance of having clear and open communication with the customer to minimize food waste. This includes ensuring compliance with the legally prescribed cold chain regulations during transportation, offering guests individual portion sizes, and using smaller, rather than larger, plates for buffet service and refilling.

Thus, the hospitality sector has already taken many initiatives, even though it is responsible for a relatively small portion of food waste. Existing statistics clearly show that the hospitality industry is not the prime source of food waste. While **households generated 53%** of the total EU food waste in 2020, **food services accounted for 9%**, a reduction from the 12% reported in 2016 Fusion estimates. Moreover, **hospitality represents only a small share of this percentage, as food services include activities not covered by our sector** (e.g., large-scale contract catering, contract catering in public institutions etc).

A large majority of the companies operating in the hospitality sector are SMEs and micro enterprises (i.e. employing less than 10 people). This specificity makes these businesses far more susceptible to regulatory burdens. Therefore, it is extremely important for any public policy aimed at reducing food waste to avoid **imposing additional regulatory and administrative burdens on small businesses, as it could seriously undermine the goal of reducing food waste.**

Considerations regarding the proposed policy measures

Baseline year 2020 – Recital (14)

HOTREC and other associations representing a great segment of the European food supply, have already pointed out that basing the reduction targets on [Eurostat's first EU-wide monitoring of food waste levels](#) is premature and flawed. This concern has been frequently raised during the consultation phase led by the European Commission over the past months. **We believe it is risky to base the target on the first reporting**, which marked the first time Member States for the first-time measured food waste since Delegate Decision (EU) 2019/1597 on the data collection. **Establishing feasible goals requires solid evidence based on established methods.**

It is essential to consider that using 2020 as the baseline for food waste reduction targets would not reflect the reality in the field and is problematic for many reasons:

- Regarding the hospitality industry, 2020 was the peak year of the COVID-19 pandemic during which our establishments abruptly had to close for months. As a result, we fear that setting EU targets based on 2020 **would discriminate against our operators** when compared to other sectors, as it holds our businesses to an unrealistic standard.

- Using the 2020 baseline could **disqualify operators who are already pioneering food waste reduction as they may have been using data from previous years, like 2015 as per the UN SDGs.**
- Using the 2020 baseline may **disproportionately affect countries in which the equivalent population related to tourism is high compared to their permanent population.**

The proposal provides some flexibility about the use of an alternative reference year at Member State level (recital 14 and Article 9 a, par. 52). Nevertheless, the actual feasibility of this change remains uncertain. **HOTREC calls for strengthening this flexibility by allowing Member States to use data from a reference year preceding 2020, especially if they have already adopted food waste prevention and reduction policies.**

Binding targets – Article 9 a (4)

The European Commission has set the **same target level for all Member States per sector by 2030** as below:

- A reduction by 10% in comparison to the amount generated in 2020, in processing and manufacturing
- A reduction **by 30% (per capita) in comparison to the amount generated in 2020, jointly at retail and consumption (restaurants, food services and households).**

To note: Primary production is not subject to specific reduction targets although it generated 11% of food waste in 2020.

While the European Commission may thoroughly justify the necessity for defining reduction targets, we believe that these **targets need to be indicative and not mandatory at the national level.**

Indeed, it is important to consider:

- Making the same target level mandatory for all EU Member States **could disadvantage more virtuous States that have already implemented food waste prevention policies or actions, as they may find it difficult to meet the new targets identified in the proposal. This methodology doesn't consider national specificities and Members States' progress when it comes to food waste reduction management.**
- The European Commission's decision to group **retail, food services - including hospitality - and consumers under one category target (30%)** requires that **the principle of proportionality** is fully applied, particularly since households are the primary source of food waste. Moreover, Eurostat's data shows that **the most important challenges in reducing waste concern the need for consumers to adopt new habits.**
- The European Commission's reliance on existing reporting obligations means that the definition of food waste continues to include both **edible and non-edible food parts**³. **By nature non-edible food waste is unavoidable and can hardly be reduced.** Although practical from an operational point of view, we believe that this approach could discriminate against

² Whereas (14) “[...] For Member States, which can demonstrate that they performed food waste measurements before 2020, using methods consistent with Delegate Decision (EU) 2019/1597, the use of an earlier baseline should be allowed.”

Article 9a, par. 5 “Where a Member State can provide data for a reference year prior to 2020, which have been collected using methods comparable to the methodology and minimum quality requirements for the uniform measurement of levels of food waste as set out in the Commission Delegated Decision (EU) 2019/1597, an earlier reference year may be used. The Member State shall notify the Commission and the other Member States of its intention to use an earlier reference year within 18 months of the entry into force of this Directive and shall provide the Commission with the data and measurement methods used to collect them.

³ It is nevertheless, to take note that the [Guidance on reporting of data on food waste and food waste prevention](#) would need to be revised. Concretely, par. 3.1 (general scope, definitions and measurement methodology applied in the reporting).

regions and establishments that follow diets and recipes producing a higher amount of non-edible food waste. To avoid this, the Norwegian national agreement on food waste allows restaurants to measure either both edible and non-edible parts or only edible parts based on their capacity, using conversion factors and coefficients to estimate non-edible parts⁴. **We call for flexibility for our operators to report both edible and non-edible or only edible parts of food waste.**

Overall, we call for the **inclusion of stakeholders' representative associations in the Commission's delegated act** process concerning the establishment of a shared methodology for consistently measuring food waste levels (Article 9a, par.(3)).

Measures at national level

HOTREC welcomes the proposal allows each Member State to choose the most effective food waste reduction measures to meet the EU targets, taking into account their specific national situation, such as enhancing awareness on food waste levels and impact; influencing attitudes and behaviours; encouraging less wasteful practices. Specifically:

- We support a path that rewards policies paying particular attention to SMEs. This involves **encouraging training and skill development as a well as facilitating access to funding opportunities, with a specific focus on preventing any disproportionate impact on SMEs.**
- **The promotion and facilitation of food donation is one solution to reduce food waste.** Many local collaborations between hospitality businesses and social organisations and food banks illustrate the success of this approach. Nevertheless, this doesn't come without challenges. In the hospitality context, food safety and the expiration date of cooked meals complicate the equation. Furthermore, the costs of transport, distribution and disposal of food donated to beneficiaries should not rely on businesses. Therefore, tax incentives on food donations should be more encouraged at national level.
- **Take into consideration the incurred costs** associated with adjustments for micro-enterprises and SMEs in the hospitality sector **when implementing food waste management systems.**

Measuring food waste

HOTREC believes that solid evidence and quality data are strategic for establishing feasible goals. Regarding Food Waste monitoring, measuring and reporting, the European Commission's proposal and subsequent national set of measures should consider **the diversity of the European hospitality industry.** Food waste measurement & reporting is often disproportionately costly for micro enterprises and SMEs. It is challenging for establishments that lack the necessary space, skills and time to carry out food waste measurement and reporting without the help of waste collectors. Additionally, hygiene and food safety risks also play a role in the matter. Negative externalities of mandatory food waste measuring in hospitality businesses should be carefully assessed and counterbalanced by support measures. We welcome the Delegate Decision 2019/1597 establishing a common EU methodology to measure food waste and **we call for an implementation of specific guidance on food waste measurement.** Such guidance should help enterprises and Member States in interpreting food waste and reporting requirements.

HOTREC will continue working closely with the EU and its members to out inefficiencies within the hospitality sector and prevent food waste at its source.

⁴ See CutFoodWaste2020-project: https://www.matvett.no/uploads/documents/final_report_KM2020.pdf (p. 16 for conversion factors used in Norway national food waste agreement.)