



NZ FOOD WASTE CHAMPIONS 12.3

Te panoni I te hangarua: Transforming Recycling

Submission from: New Zealand Food Waste Champions of 12.3

Tēnā koe,

Thank you for providing the New Zealand Food Waste Champions of 12.3 the opportunity to submit on Te panoni I te hangarua: Transforming Recycling.

NZ Food Waste Champions support the need to transform recycling and accelerate the shift to a circular economy, to change waste behaviour and move resources up the waste hierarchy.

As strong supporters of the proposals to divert food waste from both households and businesses we provide further recommendations to focus on reduction. The transformation to a more circular system must be ambitious and hard-lined in order to meet the emission reduction targets, achieve true change and meet the needs of our community.

NZ Food Waste Champions look forward to working with the Ministry to bring about these changes.

Regards,

on behalf of NZ Food Waste Champions of 12.3
Miranda Miroso, Co-Chair

About us

New Zealand Food Waste Champions of 12.3 ('NZ Food Waste Champions') are a coalition of representatives from across the food supply chain, propelling Aotearoa's progress towards halving food waste by 2030. They consist of executives from large retailers, small start-ups, food rescue organisations, membership organisations and more. We also have the NZ Food Waste Citizens of 12.3, a group of everyday Kiwis who are grass-roots, community-oriented advocates for change who are working for New Zealand to halve food waste by 2030.

NZ Food Waste Champions have made the following commitment:

Championing the United Nations Sustainable Development Goal (UNSDG) target 12.3, that *by 2030, halve per capita food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses*, in Aotearoa, New Zealand.

While NZ Food Waste Champions is a young organisation, founded in 2020, our impact in the food waste sector is strong. We are working with MfE to develop a food waste definition having advocated since our inception, we have developed New Zealand's first [Food Waste](#)

[Reduction Roadmap](#), collaboratively launched the annual Food Waste Summit with WasteMINZ, and are in the process of launching the Kai Commitment – a voluntary industry agreement to reduce food waste from across the food value chain. We discuss the Kai Commitment in more detail in this submission. A voluntary agreement has been identified as a leading solution for food waste reduction on pg 304 of New Zealand’s first Emission Reduction Plan.

Key Considerations for this consultation

The NZ Food Waste Champions support decision making that is guided by the waste hierarchy and investment that enables waste reduction behaviours from the outset. Support for behaviour change must be targeted and ambitious. Champions look forward to seeing comprehensive reporting of effort, funding and positive outcomes across the different levels of the waste hierarchy.

The Champions’ submission is focussed on PART THREE: Separation of business food waste, we have noted a number of key gaps that will need support to help transform food waste reduction and diversion in Aotearoa New Zealand:

1. **Sufficient investment in infrastructure** to ensure equitable access for all individuals, businesses and councils to recycling and food waste diversion. Transporting food waste across the country has both an economic and environmental impact.
 - a. We support the need to **build capacity and capability** to reduce and divert food waste with local solutions and local diversion prioritised.
 - b. We recognise the need for investing in **the development** of upcycled food waste products, bio-fuels, composts, fertilisers etc to enable the transition to food waste diversion.
2. There must be more **focus on reduction and avoidance** of surplus food and waste. Mandates of diversion must be accompanied by support for reduction or we will not move toward a more circular economy.
3. We recommend **solutions for food waste reduction** be provided to businesses and that the New Zealand Government partner with and/or fund projects as part of their policy response to emissions from food waste such as;
 - a. The NZ Food Waste Champions **Kai Commitment** project
 - b. **Love Food Hate Waste**

TRANSFORMING RECYCLING SUBMISSION QUESTIONS

PART ONE: Container Return Scheme

We support the proposed container return scheme.

PART TWO: Improvements to household kerbside recycling

We support standardised materials recycling in New Zealand. We strongly agree that food and garden waste should be diverted from landfills. Our comments on the support required to enable uptake of organics diversion outlined in this proposal can be seen in PART THREE however apply here, namely;

- Priority focus on top of the food recovery hierarchy; enable avoidance and reduction
- Infrastructure investment to increase accessibility to processing facilities,
 - Including showcasing the best options through lifecycle assessments to achieve emissions reductions
- Measurement and reporting in reduction, collection and end use data to encourage better practices and provide transparency for customers and government

PART THREE: Separation of business food waste

68. Should commercial businesses be expected to divert food waste from landfills as part of reducing their emissions?

Yes,

However, we strongly recommend that the **prevention of food waste** be a priority of the government alongside the diversion of food waste. Businesses should be supported to reduce their food waste.

Food loss and waste currently contributes to 8% of global greenhouse gas emissions, avoidable food waste is negatively contributing to climate change and could be used to feed people in need. NZ Food Waste Champions have made a submission to the Climate Change Commission, Waste Strategy and Emissions Reduction plan calling for an ambitious food waste reduction target to be set for New Zealand, to halve food waste by 2030. International research has established that emissions from the whole food system contribute 15-30% of annual global emissions.¹ When food is grown, produced, transported, packaged, distributed, cooked and not eaten – all of the emissions produced in that process are also wasted. This is without consideration of the carbon sequestration lost from land that is cleared to grow food. Food waste reduction has emerged as a significant action for both countries and businesses to reduce their emissions that contribute to climate change. Project Drawdown has ranked reducing food waste as the third-best action humankind can take to slow down climate change.²

69. Should all commercial businesses be diverting food waste from landfills by 2030?

Yes.

The Ministry should encourage reduction strategies focused up the food recovery hierarchy which provides useful guidelines for governments, food manufacturers, grocery retailers, growers and consumers in deciding how to prevent and manage food waste. It is imperative that businesses are provided with the tools and reasons to not only divert their food waste but reduce it, mandates of diversion must be accompanied by support of reduction. See more in question 73.

Enabling businesses to deal with food waste on site is a recommended priority to reduce the emissions produced from transporting waste.

Access to suitable infrastructure is a limiting factor in many parts of New Zealand, there must be heavy investment from the government for the country to collect and process food waste in a circular way, both for resident and business food waste diversions. If new infrastructure is needed, when considering consenting and build times, 2030 seems reasonable.

¹ Garnett, T. (2011). Where are the best opportunities for reducing greenhouse gas emissions in the food system (including the food chain) Food Policy, 36. <https://doi.org/10.1016/j.foodpol.2010.10.010>

² Project drawdown (2017), Table of Solutions. <https://drawdown.org/solutions/reduced-food-waste>

70. Should separation be phased in, depending on access to suitable processing facilities (e.g., composting or anaerobic digestion)?

Yes, businesses in areas where suitable infrastructure, including collection agencies, already exist should be able to divert food waste ahead of those areas where new infrastructure is required to be built.

The Government has a responsibility to ensure there is an adequate supply of suitable facilities to process food waste. It is not the responsibility of businesses to source access to suitable processing facilities, but that of contractors (food waste collectors) to manage this part of the process. The government must also prioritise investing in the development of upcycled food waste products, bio-fuels, composts, fertilisers etc to increase demand and enable the transition to food waste diversion.

It is imperative that the government consider the food recovery hierarchy when investing in infrastructure, as food should not be considered waste and must be managed as a resource;

- If the food waste cannot be avoided, **providing pathways for edible food waste** to end in the mouths of hungry Kiwis through the likes of **KiwiHarvest** and other food rescue organisations.
- If food must be disposed of, **local solutions** should be favoured. For example;
 - Supporting businesses to process on site ie compost, worm farms
 - Access to community compost over a facility further away
 - Enabling shared collection services for small business that don't have a large volume of food waste
- **Ensuring a lifecycle analysis** has been completed on end use to minimise emissions and loss of resources to ensure New Zealand is investing in infrastructure for long term sustainability
 - e.g. composting vs anaerobic digestion
- Organics management and composting **standards need to be established** to ensure consistency across the country. This will build trust in the product and ensure soil health is maximised, as well as ensuring ongoing issues such as clopyralid contained in compost, as well as emerging issues such as PFAS, do not compromise the quality of the product.

71. Should businesses that produce food have a shorter lead-in time than businesses that do not?

No.

In order to achieve successful uptake of the new food waste diversion processes, all businesses should be required to comply, differing lead times would complicate education and enforcement.

72. Should any businesses be exempt? If so, which ones?

No,

All businesses should be required to comply, we support a duty of care model. We recommend the provision of capability to businesses of a certain size, or non food producing

business such as offices, as they would likely have too little food waste for an organics collection provided by a waste collector and yet may not have the capability to compost onsite. Options such as shared schemes (businesses working together and sharing bins), community compost collectives, providing tools for onsite food waste management such as worm farms are some examples of support.

73. What support should be provided to help businesses reduce their food waste?

The Ministry should promote a food recovery hierarchy ensuring the priority is toward the top of the hierarchy, encouraging (in order of preference) source reduction, feeding hungry people, feeding animals, and composting, with disposal as a last resort. Coupling support to reduce with mandates to divert is the key to empower behaviour change. Moving food from the landfill bin to the organics bin is not the only solution required to impact climate change, ensuring food isn't wasted is a necessary priority.

We identify three key areas of support to ensure success;

1. Invest in business food waste reduction organisations and projects

There are many food waste prevention and reduction initiatives in New Zealand that are doing good work but rely on small grants and private donations for their operating expenses. In many cases, these initiatives are based on internationally proven programmes, e.g. NZ Champions of 12.3 as an organisation, its Kai Commitment voluntary agreement project (discussed below) and WasteMINZ' Love Food Hate Waste Campaign.

We recommend that the New Zealand government **partner with/fund existing and well-established food waste reduction initiatives** such as NZ Champions of 12.3, the Kai Commitment and the Love Food Hate Waste campaign to amplify their work and maximise their food waste diversion and emissions abatement impact.

The Kai Commitment voluntary industry agreement on food waste reduction

The Kai Commitment, a project of NZ Food Waste Champions, is a public/private partnership to reduce food waste and emissions from food waste, from New Zealand's food business sector. This emulates Your Business is Food,³ the Australian Food Pact⁴ and the Courtauld Commitment⁵ which are all examples of successful industry voluntary agreements. This solution has been noted as a key solution to food waste reduction on page 304 of the New Zealand Emissions Reduction Plan. The Kai Commitment is in the Design Phase and has 3 founding signatories; Countdown, Goodman Fielder and Fonterra Brands NZ. It is set to launch in August with five founding signatories who will form a community of best practice, lead system-level change in the food sector and innovate on common waste streams across the supply chain.

The Ministry for the Environment is supporting the design phase of this project through the Strategic Partnerships team and the Waste and Resources team. An Ministry for Environment representative sits on the Kai Commitment's Steering Committee as an observer. In alignment with this proposal, we recommend this endorsement extend to the implementation of the project to enable long-standing sustainable support for industry

³ Your Business is Food website <https://newaste.org.au/ybif/>

⁴ <https://www.stopfoodwaste.com.au/australian-food-pact/>

⁵ <https://wrap.org.uk/taking-action/food-drink/initiatives/courtauld-commitment>

sectors to understand, measure and manage their food waste, with a strong focus on reduction.

A voluntary industry agreement commits participants to follow a simple **Target, Measure, Act** process to set ambition, understand where and why their waste occurs, and set an action plan to reduce food waste and emissions from food waste. Signatory businesses **Collaborate** on industry-wide activities to ensure the proliferation of best practices and innovation on common food waste problems.

NZ Food Waste Champion's primary role will be the convenor and facilitator of the group to foster collaboration and momentum. However, international experience tells us that a strong value proposition is necessary for businesses to fully engage with the programme and for there to be a significant impact on food waste and emissions. With government support through additional funding (as happens overseas), the Kai Commitment could offer businesses support such as:

- **Best practice tools** to measure and report on food waste and emissions from food waste.
- **Build industry capability** access to webinars, circulating best practices and case studies.
- **Technical support** for setting action plans and implementing waste reduction initiatives.
- **Insights from international advisers** and industry-level analysis for widespread impact.
- **Active consumer** and business-facing awareness to promote food waste reduction.
- **A platform for connection across the industry** – to collaborate, share ideas and problem solve.
- **Advocacy** and advice to the government through (i.e. as a key stakeholder on infrastructure planning, regulatory changes).

Please get in contact if you would like more information or ideas on how the government can collaborate on food waste reduction opportunities to ensure we meet our emission targets and enable businesses and individuals to play their part.

2. **Set National food waste reduction targets for New Zealand in the waste strategy, mandate measurement and reporting against these targets**

As noted in the consultation document, the proposed New Zealand Waste Strategy sets a target for businesses to reduce their waste by 30 to 50 per cent, however we strongly recommend setting a specific food waste target. The Ministry should set a baseline for food waste, understanding the distribution across industries will inform industry targets and opportunities. Reduction targets motivate businesses to change their behaviour, collaborate and be transparent about their progress. Projects such as the Kai Commitment can enable transparency, data collection and create pathways to achieve targets.

We recommend all-inclusive measurement of behaviours up the hierarchy, not just at the disposal level. Focusing on disposal only discourages innovation and emissions reducing behaviour.

Creating a culture of transparency with data and waste practices will influence social norms and enable;

- Consumers to support businesses who are doing the right thing
- Businesses to lead and constructively compete in their food waste reduction practices

- Governing bodies to provide more support and/or consequences to those that are not meeting their targets
- Businesses to be more aware of their volume of waste and contamination levels via mandated transparency from waste contractors.
 - There must be strengthened lines of communication between collectors and businesses/government

3. Deliver a strong Education Campaign and provide tangible tools to build capability

To enable true change there must be nation-wide communications and tools with consistent and clear messaging. The below recommendations can be achieved through collaborating with organisations that are delivering this work such as NZ Food Waste Champions, The Kai Commitment or Love Food Hate Waste.

- A far-reaching, innovative, comprehensive campaign across multiple platforms
- Tools and programs provided with support. For example programs such as Love Food Hate Waste for business, delivered in Victoria and NSW, Australia, action plans and support for hospitality businesses and saw initial reduction rates of 16%-20%
- Funding to implement or trial innovative solutions; providing resources and building capability for businesses to compost on site or take to a local community garden etc
- Create a recognition program for businesses that recover food. In conjunction with the new, streamlined online reporting system for recycling, the Ministry should provide the opportunity for businesses to report food recovery activities.
- A lifecycle analysis of best end use for food waste would be a good guide to educate on best diversion solutions to enable reaching of emission reduction targets

New Zealand Food Waste Champions of 12.3

Miranda Miroso – Otago University (Co-Chair)
 Susan Goodfellow – Leftfield Innovation (Co-Chair)
 Deborah Manning – KiwiHarvest and New Zealand Food Network
 James Griffin – Sustainable Business Network
 Kate Porter – Aotearoa Food Rescue Alliance
 Nick Loosley – Everybody Eats
 Andrew Fisher – EcoStock and EcoGas
 Angela Clifford – Eat New Zealand
 Ailsa Robertson – Horticulture New Zealand
 Paul Harvey – Fonterra Co-operative Group
 Catherine Langabeer – Countdown
 Sarah Pritchett – WasteMINZ

Note, the NZ Champions 12.3 have submitted on the He Tuapapa ki te ora / Infrastructure for a Better Future, Te Kawe i te haepapa para | Taking responsibility for our waste and Te hau mārohi ki anamata | Transitioning to a low-emissions and climate-resilient future and made key recommendations that are also relevant to the Food Waste diversion proposals outlined in this consultation.

Thank you for considering our submission. This submission has been endorsed by Co-chairs and represents views and input from most Champions. Due to the short consultation

timeline, consensus and feedback from all Champions has not been possible.

You can get in touch with New Zealand Food Waste Champions 12.3 General Manager through: kaitlin@nzchampions123.org.