

5 May 2006

Gillian Smith
Waste Strategy Team
CRE55
Preventing Household Waste in Scotland
Central Scanning Unit
Saughton House
Edinburgh
EH11 3XD

Dear Ms Smith,

CONSULTATION ON PREVENTING HOUSEHOLD WASTE IN SCOTLAND

On behalf of the Scottish Food and Drink Federation (SFDF) I would like to thank you for the opportunity to comment on the aforementioned consultation.

Background

As you will be aware, SFDF represents the common interests of the food and drink manufacturing industry. We work to improve the environment in which the individual companies who make up the industry operate: be it legislative, economic, social or political. In so doing, we aim to help maximise the competitiveness and profitability of the industry.

59,300 people are employed in the food and drink sector in Scotland (54,000 in food industry alone) – some 11.8% of total British food and drink sector employees. The industry in Scotland also accounts for annual sales of around £4.2 billion (exc. whisky).

Comments

SFDF has been looking at the issues of waste and sustainability for some time. As well as promoting the Waste and Resources Action Programme (WRAP) to our membership, SFDF and its partners in the Scottish Food Chain Group¹ supported WRAP's Innovations in Packaging Technology seminar in Edinburgh on 31 January 2006. In addition, SFDF has had constructive dialogue with other bodies such as Envirowise and have worked in partnership with them on a number of initiatives to address the related issues of waste and sustainability. More information on recent initiatives can be found in SFDF's response to the Scottish Executive Consultation on Sustainable Management of Waste from Business and Public Sector Organisations in Scotland.

¹ The group consists of representatives of SFDF, the National Farmers Union Scotland, the British Hospitality Association, the Scottish Grocers Federation, the Scottish Retail Consortium and the Sea Fish Industry Authority and promotes regular dialogue along the food chain as well as providing a mechanism for collaboration on issues of common interest.

I have provided comments on behalf of SFDF in response to questions asked of product designers and manufacturers. In summary,

- Further promotion of eco-design involving the bodies cited in the consultation could be beneficial (Question 1).
- Conducting further work on developing waste profiles of products would be worthwhile but only on products which contribute significantly to the waste streams in Scotland (Question 2)
- Whilst SFDF supports the principle of an integrated product approach to assess the impact of a product throughout the whole of its lifecycle, we have reservations about an integrated product approach being applied to food and drink products as a whole, for a number of reasons as outlined in the response below (Question 5).

I trust that these comments will be taken into consideration. If you require further input or comment please do not hesitate to contact me.

Yours sincerely,

Steven Birrell
Executive

SFDF RESPONSE TO SCOTTISH EXECUTIVE CONSULTATION ON PREVENTING HOUSEHOLD WASTE IN SCOTLAND

Question 1: Do consultees consider that the Scottish Executive, SEPA and the Enterprise Networks, or other bodies sponsored by the Executive, such as Envirowise, should do more to promote eco-design in Scotland.

SFDF agrees that it would be worthwhile for the aforementioned bodies to do more to promote eco-design in Scotland. The consultation notes successful work in this area which takes place at a UK or EU level will be likely impact on Scotland. However, an initiative to promote eco-design, would still be worthwhile if it could raise the profile of this issue within Scotland. SFDF understands that sponsoring research already takes place through the WRAP initiative, however further promotion of this in Scotland may be advantageous within the existing network of bodies and organisations listed above. SFDF would not be in favour of the creation of a new body to look at eco-design.

Question 2: Should the Scottish Executive and SEPA carry out further work on “waste profiles” of products?

SFDF believes the further work by the Scottish Executive and SEPA to carry out waste profiles of products is worthwhile but that this work should be carried out on products which contribute significantly to the waste streams in Scotland. This would require close liaison with various bodies, including those mentioned in the consultation, to determine which products are likely to be the most significant in terms of impact on the waste streams. The consultation lists a number of possible options as to how best to progress this work. Whilst sponsored research may be an effective route to developing waste profiles of products, the Scottish Executive and SEPA should consider what, if anything, is being done by other government departments across the UK and elsewhere to ensure effective use of resources and avoid duplication of effort.

Question 5: Would it be desirable and/or feasible to run an Integrated Product Policy pilot in Scotland? If so, for which product(s)?

SFDF member companies are firmly committed to the continuous improvement of their products and processes while at the same time meeting consumers' needs. Companies are already taking initiatives which go significantly beyond legal requirements and, in some cases, are using tools such as Life Cycle Analysis (LCA) to assess the impact of different product options. Companies are also committed to working with their suppliers and other partners in the food supply chain to maintain high standards and encourage best practice.

SFDF supports the principle of an integrated product approach to assess the impact of a product throughout the whole of its lifecycle from the raw materials used through to manufacture, distribution, consumption and disposal. However, we have reservations about an integrated product approach being applied to food and drink products as a whole for the following reasons:

- **The food and drink industry is already covered by very detailed, comprehensive and specific legislation to ensure that consumers are provided with safe, high quality and**

wholesome food. This legislation covers food safety, food hygiene, food composition, nutrition and consumer information etc.

- **The industry is also subject to a raft of increasingly challenging environmental legislation including that covering waste, water and IPPC.** Waste includes the Packaging Waste Regulations which set recovery and recycling targets and the Essential Requirement Regulations which require all packaging placed on the market to be minimised and compliant with specified heavy metal limits. PPC legislation applies to food and drink companies above a certain threshold and requires companies to apply Best Available Techniques to prevent or minimise any environmental impacts arising from the production of food.
- **Companies are already acting voluntarily to integrate environmental considerations into all aspects of their business and are already taking initiatives which go significantly beyond legal requirements** e.g. environmental reporting, environmental management systems and energy efficiency.
- **Companies are already using tools such as LCA in some cases to assess the impact of different product options.** The LCA methodology does however have significant limitations (including choice of system boundary, data availability and accuracy, allocation procedures) which raises uncertainty about the reliability of the results. LCA is not designed to serve as an instrument for public policy-making and should remain as an internal, voluntary tool for companies to use in specific circumstances e.g. to assess packaging material and design.
- **The diversity of production techniques and the huge variety of resultant finished products in the food and drink industry means that, in reality, it would be difficult to apply an integrated product approach to compare one product with another.** Furthermore, products need to be considered on a case by case basis in the context of how they are going to be used e.g. a 2 litre milk container has less environmental impact than four 0.5 litre containers but there is a bigger environmental impact if even a small amount of milk goes off and has to be thrown away [INCPEN, Towards Greener Households, 2001]. Standardising products in some way would hinder innovation, limit consumer choice and could have an adverse impact on the environment with products no longer being provided in a range of sizes to allow consumers to choose the size which best suits their circumstances.
- **Additional ‘green labels’ or environmental information on the label is likely to confuse the consumer.** Food and drink products are exempted from the EU Eco-Labeling Scheme [Council Regulation 880/92] due to the huge variety of food products on the market. The only existing ‘green labels’ are for organic food [EU Regulation 2092/91 on organic farming].

The food and drink industry therefore considers that food and drink products should not be a priority for IPP and would not be suitable to be put forward as a sector to participate in possible pilot projects.

Question 8: Do consultees consider that food labelling requirements cause any conflicts with waste prevention? If so, what are these conflicts and what can be done to reduce them?

SFDF agrees with the assertion made in the consultation document that hygiene requirements in relation to food must remain paramount. For the UK industry, food safety is the number one priority – this is not negotiable. FDF's foodlink programme, launched in 1992, demonstrates the food and drink manufacturing industry's commitment to food safety and the consumer by raising awareness amongst consumers of all ages about the simple steps they can take to keep their food safe. Foodlink's National Food Safety Week runs 12-18 June 2006 - full details are available at www.foodlink.org.uk

The consultation also notes that there are a number of labels on food to help consumers with food hygiene and food safety issues, most notably, 'use by' and 'best before'. However, as the document acknowledges, these terms have distinctly different meanings with 'use by' specifically referring to product *safety* whilst 'best before' relates to product *quality*. This difference is not always understood by some consumers who discard products once they reach the best before date because they wrongly perceive these goods to be unsafe for consumption. This misunderstanding can result in unnecessary food waste.

Question 10: Do consultees consider that action should be taken to reduce food waste in the home? If yes, what action should be taken?

For information, a consortium of packaging chain organisations, including FDF, working under the aegis of Incpen are seeking to contribute to WRAP's work on reducing household food waste. Discussions are currently taking place regarding possible specific projects.

The Food and Drink Manufacturing Industry

The Scottish Food and Drink Federation (SFDF) represents the food and drink manufacturing industry in Scotland.

The food and drink manufacturing industry in Scotland has a gross output of around £6.5bn and accounts for circa £2.5bn of total UK exports and 11.8% of the UK sector workforce.

SFDF is a devolved division of the Food and Drink Federation (FDF), the voice of the UK food and drink manufacturing industry. As the largest manufacturing sector in the UK, food and drink manufacturers employ over 500,000 people and have a combined annual turnover of in excess of £69bn. UK food and drink exports in 2003 were almost £10bn.

The following organisations 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 & 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
FF	Frozen Food Group
GPA	General Products Association
ICF	Ice Cream Federation
IDFA	Infant and Dietetic Foods Association
LDT	Lifestyle and Dietary Trends Group
MSA	Margarine and Spreads Association
MG	Meat Group
NABIM	National Association of British and Irish Millers
NACM	National Association of Cider Makers
OHG	Out of Home Group
ORG	Organics Food and Drink Manufacturers' Group
SB	Sugar Bureau
SG	Seafood Group
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
VEG	Vegetarian and Meat Free Industry Group