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Finnish Food and Drink Industries' Federation: Open comment to the public consultation on the revision of the Waste Framework Directive (WFD)

Finnish Food and Drink Industries' Federation (ETL) is acknowledging the challenge of food losses and are committed to supporting the international targets. We are working actively towards material efficiency together with other actors in the food systems and ensuring the highest level of food safety while simultaneously reducing food waste.

With this open comment Finnish Food and Drink Industries' want to share our knowledge and learnings of the best practices to meet the ambitious targets.

A voluntary commitment as an effective and fast tool to reach ambitious targets

We have good experience of how voluntary commitments can effectively promote sustainable practices and help to achieve ambitious environmental goals. In Finland, food and packaging industries and retail and restaurant sectors have made the voluntary Material Efficiency Commitment.

General objective of the commitment is to improve the profitability and reduce the environmental impacts of food production, packaging, and distribution. A Finnish food sector has made more detailed targets and committed to reduce the food waste 25 percentage by the end of the 2026 and halve it by 2030. In addition, commitment includes targets to increase reuse and recyclability of packaging and reduce the amount of plastic in packaging.

We believe that voluntary agreement between the state and the business and industry sector can be an effective tool for reducing waste generation and promote re-use and recycling. The main benefits of voluntary commitments include the smoother preparation compared with legislative processes, which means that also measures can be started quicker. Companies who have signed the voluntary commitment form a pioneer network for knowledge sharing. Sharing the best practices is one of the most important and effective measures in reducing food waste.

Model of efficient EPR system already exist

The development of harmonized EPR schemes across the EU is a key to increasing material recycling. The revised Waste Act entered into force in July 2021 and extended producer responsibility (EPR) for packaging. Companies' responsibility for costs in packaging waste collection starts by 2023. This is an example of how a small entry in the legislation can cause a big change in practical terms. As a result, five existing packaging material producer organizations in Finland merged into one, Finnish Packaging Producers Ltd (SPT).

SPT covers all packaging materials under the EPR (plastic, metal, fibre, glass and wood). The aim of the new organization is to ensure the continuity of producer responsibility operations and an efficient development of the material-specific recycling market also in the future.

Common definitions, reporting and measurement tools are essential

We believe that the most effective way to improve waste prevention is a combination of different policy options. In this context, we call the Commission for the development of EU guidelines to help member states and food industry on food waste measurement. This would be important in order to measure the impact of prevention measures, and to make sure that the data and reporting

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requirements are harmonized around Europe. An example of the challenges that the lack of common definitions may cause have seen in the Single Used Plastics (SUP) Directive. The first requirements have already entered into force even there are open issues related to the definitions and the implementation of the directive. Poorly prepared legislation causes confusion and uncertainty which both should be avoided, and special attention be paid to the careful preparation of legislation in the future.

In final, we want to remind that in line with the better regulation all further actions in waste prevention and in waste management should be based on analysis of reliable data and a comprehensive impact assessment.