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Circular Economy Strategic Policy Section
Department of Climate, Energy and the
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Newtown Road
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11 September 2026

EPA Reference: EPAC-1426

Re: Public Consultation on Ireland's National Food Waste Prevention Roadmap 2026-2028

Dear Circular Economy Strategic Policy Section,

The Environmental Protection Agency (EPA) welcomes the opportunity to submit views on the proposed National Food Waste Prevention Roadmap 2026-2028.

The EPA has played an active and multifaceted leadership role in food waste prevention in Ireland through the National Circular Economy Programme and associated food waste prevention programmes (including Stop Food Waste and the Food Waste Charter), waste data reporting and research, and most recently as a member of the National Food Waste Prevention Taskforce.

The targeted revision to the Waste Framework Directive has introduced challenging statutory targets for reduction of food waste and new food waste prevention measures to support meeting the targets. These will broaden the range of bodies involved in the delivery of food waste prevention measures in Ireland, will require alignment to the Priority Action

Areas in the final Roadmap and a national co-ordination mechanism, such as an expanded Food Waste Prevention Taskforce.

The Roadmap contains a list of actions to be the focus of implementation. We would welcome engagement on proposed actions to be assigned to the EPA. Delivery of EPA food waste prevention activities requires appropriate staff resourcing and support systems including ICT systems and data management capabilities. Requests for the EPA to take on new roles or additional responsibilities should be communicated to the EPA's Office of the Director General in writing, along with information on the proposed funding mechanisms.

Strategic Environmental Assessment (SEA) evaluates the environmental effects of policies, plans, and programs. It is recommended that the Department clarifies whether the requirements of the SEA Directives have been considered. More details are available [here](#).

Appendix 1 provides the EPA's detailed comments on the consultation questions and Appendix 2 provides specific observations on the draft Roadmap.

If you have any queries or need further information in relation to this submission please contact cep@epa.ie.

Yours sincerely,



Mary Frances Rochford
Programme Manager, Circular Economy Programme

Appendix 1: Public consultation questionnaire

Do you think the approach as outlined in the draft Roadmap will be effective in helping to deliver the reductions necessary to meet Ireland's food waste reduction targets under the revised Waste Framework Directive, and Ireland's commitment to achieve the UN SDG 12.3?

The EPA recommends that the final Roadmap highlights the role of food sector businesses in delivering food waste prevention to meet the statutory targets. Involving the sectors subject to the new binding EU food waste reduction targets (food processing and manufacturing, retail and distribution, hospitality and food service) will be central to achieving national targets.

Through the Food Waste Charter, the EPA has had positive engagement with State Agencies and industry representative bodies with a role in supporting the development of the food sector. It will be important to build on this experience and highlight the need to focus on food waste prevention in their sustainability programmes, training and funding supports. Increased focus on measurement, and the integration of evidence-based prevention actions into business operations would help ensure efforts are directed towards interventions that deliver the greatest impact.

In your opinion, which actions included in the draft Roadmap will be the most effective in reducing food waste? Are there any other actions that should be considered?

The EPA welcomes the Roadmap's recognition of the importance of food waste measurement, evidence-based policy development, and behavioural change interventions. Robust data and consistent measurement methodologies are fundamental to identifying food waste hotspots, tracking progress and supporting targeted action. Experience from implementation of the Food Waste Charter demonstrates the value of a voluntary, measurement-based approach in building engagement across the food supply chain and strengthening collaboration with Government Departments, State agencies and sectoral organisations. This has helped embed food waste prevention within wider sustainability initiatives, advisory supports and funding programmes.

While examples of good practice are emerging, achieving the reductions required under the revised Waste Framework Directive will require a continued focus on evidence-led actions

that prioritise prevention in accordance with the EU Food Use and Waste Hierarchy. Some businesses will require additional support to undertake measurement and reporting, and any future reporting framework should be accompanied by practical guidance, training and technical assistance, particularly for SMEs.

What are the most effective awareness-raising measures and behavioural change interventions that could be considered to support efforts to reduce food waste?

The EPA recommends that household awareness-raising measures and behavioural interventions focus on promoting simple, practical food management behaviours that can be easily incorporated into existing routines.

Research undertaken through the EPA's circular economy behavioural insights programme demonstrates that food waste in households is often driven by everyday food management practices, including purchasing habits, portioning, storage and the management of leftovers, rather than a lack of awareness of food waste as an issue.

Interventions are most effective when they focus on small, manageable actions that fit within existing household routines. Interventions that increase the visibility of food waste and provide feedback on household behaviours may have an important role in supporting long-term behaviour change. This also presents opportunities for linking food waste prevention with food waste segregation. The research also found that adopting one simple behaviour often acted as a catalyst for broader food management improvements over time.

The EPA recommends that awareness campaigns and behavioural interventions are:

- Evidence led, informed by behavioural research and insights.
- Targeted to specific audience(s), informed by behavioural research.
- Focus on specific, practical actions that households can implement immediately.
- Promote food management skills such as food storage, freezing, portion management and leftover use.
- Use clear and relatable messaging that demonstrates the financial benefits of reducing food waste, alongside environmental benefits.

The EPA's behavioural research also highlights the value of food waste tracking and measurement in making food waste more visible to households.

Are there other measures that should be considered to address inefficiencies in the functioning of the food supply chain and to support cooperation amongst all actors with the aim of reducing food waste?

The EPA recommends that the final Roadmap identifies mechanisms through which key sectors can collaborate to address supply chain inefficiencies. DETE's Retail Forum and the Horticulture Grower-Retail Charter will provide useful platforms to support stakeholder engagement, knowledge sharing and the identification of practical measures to reduce food loss and food waste.

Further research may be required to better understand the causes of inefficiencies within different sectors of the food supply chain and to inform evidence-based interventions aimed at preventing food waste.

How should food waste prevention related training and skills development, and access to funding opportunities be supported, in particular for small and medium-sized enterprises and social economy entities?

The EPA recommends that food waste prevention training, skills development and access to funding opportunities should build on established delivery mechanisms and support structures. Leveraging established networks and initiatives can help maximise participation, reduce duplication of effort and ensure supports are accessible to a broad range of organisations.

The EPA recommends that consideration be given to using existing skills development programmes delivered through State agencies and education providers.

The EPA recommends that the final Roadmap includes an action to undertake a study to examine the existing training and skills development courses available in the market, which would also identify gaps in training needs (similar to the EPA's Circular Insights study on [Repair Skills Training and Education in Ireland](#)).

The revised Waste Framework Directive requires Member States to take measures to ensure that economic operators identified as having a significant role in the prevention and generation of food waste propose food donation agreements to food banks and other redistribution organisations. How should this be implemented in an Irish context? Please consider the following:

- **The criteria for identifying the economic operators that will be subject to this requirement (for example, facility size, amount of surplus food generated, annual revenue).**
- **Whether a phased approach should be introduced and, if so, how this should be applied?**

The EPA supports measures to facilitate the redistribution of surplus food for human consumption, in line with the EU Food Use and Waste Hierarchy. The EPA recommends that any requirements introduced under the revised Waste Framework Directive should be proportionate and designed so as not to undermine efforts to prevent food waste at source. Prevention should remain the priority, with food donation and redistribution acting as an important secondary measure for managing unavoidable surplus food that is suitable for human consumption. Measures should therefore be designed to support both food waste prevention and food redistribution, rather than creating unintended incentives to generate surplus food for donation.

Should mandatory and proportionate food waste reporting requirements be introduced for certain food businesses? If so, which food businesses should be considered for such reporting?

Overall, the EPA supports an evidence-based and proportionate approach to food waste reporting, underpinned by EPA's standardised measurement methodologies and appropriate support mechanisms to enable businesses to identify and implement effective food waste prevention measures.

Robust measurement and reporting are essential to understanding where food waste occurs across the food supply chain and within a business. Regular reporting leads to improved data quality over time and if interventions are targeted at food waste hotspots identified through measurement, that will deliver the greatest impact in meeting Ireland's food waste reduction targets.

In considering future mandatory reporting requirements, the EPA recommends building on existing reporting systems. These include mandatory reporting requirements for EPA-licensed facilities (food and drink sector) and the Central Statistics Office's Waste Generation Survey of a sample of businesses to support national reporting under the EU Regulation (EC) No. 2150/2022 (Waste Statistics Regulation).

What date marking measures could be considered to support food waste prevention at a consumer level?

The EPA supports the continued use of date-marking measures and consumer information campaigns to help prevent avoidable food waste. Raising consumer awareness of the distinction between "use-by" and "best before" dates remains an important area of focus for Stop Food Waste communications given the findings of EPA's behavioural research, as detailed in the draft Roadmap. The EPA recommends a co-ordinated national approach on date marking communications, to maximise reach and engagement with the public.

The EPA suggests including an action in the final Roadmap relating to appropriate application of date labels by food manufacturers and retailers. International experience, including work undertaken by WRAP in the UK in collaboration with the grocery sector, has demonstrated the potential for improved date-marking practices to reduce unnecessary food waste while maintaining food safety.

The FoodCloud Food Circle Project Reports published alongside the draft Roadmap make policy recommendations to support food donation and redistribution. In your view which recommendations listed in the reports (also included in Appendix 2 in the draft Roadmap) should be considered as priority actions for implementation?

Several policy recommendations in Appendix 2 relate to providing clear definitions, guidance and indemnity for food donors. These appear to be very practical steps that could support greater uptake of food donation and redistribution of food for human consumption.

Research and innovation are important for the development of new methods and technologies to reduce food waste. What would you see as being a priority area for research as part of implementation of the next Roadmap? Are there any types of technology that should be examined as a potential solution to reduce food waste in a specific area within the food supply chain?

EPA funded research will continue to focus on generating evidence to support government policies and initiatives, as well as other enabling measures, to prevent food waste along the food supply chain and promote the valorisation of secondary raw materials within Ireland's food sector, contributing to greater competitiveness, innovation, and market resilience. The

EPA's thematic research priorities, which will set the strategic direction for the EPA Research Programme over the next three years, will be published in 2027.

Appendix 2 Comments & feedback on the content of the draft Roadmap

2 Reducing Food Waste – International, EU and National Commitments

- The EPA suggests that the National Strategy for Horticulture 2023-2027 is referenced as a national policy measure.

3 The Second Roadmap

- The EPA recommends separate bullet points for (i) research and innovation and (ii) green public procurement.
- In Table 1, the EPA recommends adding DAFM as a co-ordinating competent authority, given their role in SDG 12.3.

5. Working Together Towards a Common Goal

- As the Food Waste Charter is open to all businesses across the supply chain, it is recommended that this is reflected in the text under 'Business Sectors' and 'Primary Producers'.

6 Food Waste Measurement and Reporting

- The EPA commits to sharing annual food waste statistics and associated quality reports (which include the reporting methodology) on the EPA website. The EPA also plans to publish information on Ireland's progress towards meeting EU-binding food waste reduction targets once the baseline reference years are confirmed.
- The EPA supports the commitment to examine the establishment of a food loss measurement and tracking system for primary production. However, the development of a suitable and proportionate methodology for measuring food loss in the primary production sector will be required before such a system can be implemented. The EPA recommends that the Roadmap explicitly recognises the need for methodological development and stakeholder engagement in this area.

7 The Food Waste Charter

- The EPA recommends that the opening paragraph in this section reflects that membership of the Food Waste Charter is open to businesses across the full supply chain (primary production is not referenced).

- The EPA suggests replacing the opening sentence of paragraph 3 with the following: “The Food Waste Charter is a voluntary agreement, first introduced in 2017 to support engagement on food waste within the grocery retail sector, using a set of binding principles.”
- The EPA recommends referencing the recently published food waste measurement methodology for food retail businesses¹ in the paragraph on the Food Waste Charter’s guidance and tools to support measuring and reducing food waste.
- The Food Waste Charter Implementation Report for reference year 2025 will be published in September, therefore the EPA recommends that this publication is referenced in the final Roadmap. As of end August 2026 there are 114 Charter members.
- The final paragraph sets out actions for the Food Waste Charter (to note these don’t align to Appendix 1). In this section, actions are described as being informed by the Food Circle project, but it is not clear what recommendations are reflected in these actions. The EPA recommends the following actions for the Food Waste Charter be reflected in the final Roadmap.
 - Update the Food Waste Charter, as appropriate, to support the obligations under the revised Waste Framework Directive.
 - Increase Charter membership to increase engagement on food waste measurement and prevention across the food supply chain; target to have over 150 members by end of 2028.
 - Build knowledge and develop capacity for food waste measurement and prevention in food sector businesses.
 - Develop resources to support food waste prevention actions in food sector businesses and conduct studies to build evidence base as appropriate.
 - Coordinate the Food Waste Charter Action Group.

9 The Bioeconomy- Food Waste Segregation, Valorisation.

- The EPA recommends that this section includes reference to By-Products Regulation 27. By-product provisions may provide opportunities to reconsider how certain

¹ <https://foodwastecharter.ie/measuring-food-waste/>

production residues such as spent grains, off-spec beer and oyster shells can be managed, and by-product determinations have been made in the case of some of these materials. The EPA can provide expert guidance, support and insights on Regulation 27 to ensure regulatory compliance while unlocking opportunities for food businesses to classify production residues as by-products (non-waste).

- There is a reference to 'reuse waste' on page 27. It is recommended that 'reuse waste' is replaced with 'manage waste beneficially' as the practice of reuse is strictly limited to material that is not waste.
- The EPA recommends a dedicated action in the final Roadmap relating to raising awareness of Regulation 27 By-Products in food production sectors through the support of the Food Waste Charter, relevant State Agencies and industry representative bodies.

10 Behavioural Change, Education and Awareness

- While Circular.ie provides consumers with information on a broad range of circular economy topics, Stop Food Waste is specifically focused on providing information and resources for consumers on household food waste prevention. The EPA recommends the final Roadmap text is updated to reflect this.
- The EPA recommends that in the final Roadmap the description of the EPA's behavioural insights research (page 29) is strengthened to reflect its wider contribution beyond informing interventions. This research provides valuable evidence on consumer attitudes, behaviours and decision-making relating to food purchasing, storage, preparation and disposal. The findings help identify opportunities for food waste prevention and inform campaign messaging, target audiences, as well as behavioural interventions.
- The EPA recommends the inclusion of a dedicated action or actions to support the development and promotion of food management and cooking skills as food waste prevention measures.

11 Research and Innovation

- The EPA welcomes the proposal to maintain a register of priority research topics and a compendium of research and innovation activities related to food waste.

- The EPA recommends that the final Roadmap clarifies how research outputs will be disseminated to policymakers, businesses and other stakeholders.
- It is recommended that the register is made publicly available as well as key outputs, evidence summaries and research priorities. This would strengthen knowledge transfer and maximise the value of research investments.
- It is recommended that the new food waste prevention measure under the revised Waste Framework Directive ‘to encourage and promote innovation and technological solutions’ is referenced in this section.

13 Monitoring, Evaluation, Review and Knowledge Sharing

- The EPA recommends that consideration is given to conducting studies on the role of food waste prevention in climate action in Ireland (global emission figures are quoted in the absence of national data) and food waste prevention to cost savings in business sectors.

Proposed Actions for Second Roadmap Period

- Action 14 proposes capturing data on surplus food donation for inclusion in official food waste statistics reporting. As food redistributed for human consumption is not food waste it does not form part of national food waste generation statistics. The EPA recommends that this action moves to the section on *Food Donation – Redistribution* and that the action reflects the need to develop a tracking system/metrics on food redistribution activity.

Appendix 3: Supporting Policy and Legislative Context

- The EPA recommends adding the National Horticultural Strategy 2022-2027 and the National Horticulture Grower-Retail Charter to this appendix.
- The EPA suggests that consideration is given to including Trading for Impact, the National Social Enterprise Policy 2024-2027, given the key role of social enterprises in food donation and redistribution of food to humans.

ENDS