

AFRA Emissions Reduction Plan



About AFRA

The Aotearoa Food Rescue Alliance (AFRA) is an alliance of food rescue groups formed in response to Covid-19. AFRA's purpose is to prevent food waste and nourish communities. It supports members through capacity building, best practice, collaboration and advocacy. It has grown from 17 founding members in March 2021 to 22 today and encompasses New Zealand's major food rescue organisations.



Food rescue has played an essential role in the last eighteen months ensuring those who needed food received it. They rescue food directly from producers or retailers, or receive it from the New Zealand Food Network (NZFN) and then distribute it to recipient charities or New Zealanders in need. AFRA appreciates the opportunity to make a submission on the Emissions Reduction Plan. AFRA is proudly working with Kore Hiakai Zero Hunger Collective, NZFN and Ministry of Social Development to help build the capacity and capability of foodbanks, food rescue and community food services and prevent further shocks to food security in New Zealand. AFRA's members are:

Auckland City Mission Fair Food
Free Store Wellington
Friendship House Huntly
Food Rescue Northland
Gizzy Kai Rescue
Good Neighbour
Halo Charitable Trust Just Zilch
Kaibosh
Kairos
Kaivolution | GoEco

KiwiHarvest
Kiwi Community Assistance
Love Soup, Hibiscus Coast & Love Soup
Tokoroa
Nelson Environment Centre - KaiRescue
Nourished for Nil
Rotorua Whakaora
Satisfy Food Rescue
The Hub Te Puke
Waiheke Resources Trust

Summary

Food rescue turns an environmental problem into a social and economic solution.

AFRA believes there is far greater potential to reduce methane emission from food waste in New Zealand and food rescue should receive greater prominence as an affordable, immediate, high social return on investment climate solution in the Emissions Reduction Plan.

9% of New Zealand's biogenic methane emissions and 4% of our total greenhouse gas emissions are from food and organic waste.¹

Food rescue is only mentioned once in the 130 page ERP under 'Initiatives could motivate businesses to look for ways to reduce their food waste and might encourage more donations of food-to-food rescue,' This sentiment is welcome but lacking in ambition and detail.



We also would encourage focus, attention and resourcing on the food rescue side of the equation as businesses already have an economic incentive and social responsibility to reduce waste - the key barrier is a lack of capacity and resourcing for food rescue to transport, store and distribute food.

AFRA notes food rescue is already established, locally-connected, with a national presence and is a more affordable and immediate way to reduce emissions than investments in large scale infrastructure such as landfill gas capture or large scale composting. It can be scaled-up fast and the only limitations are increased capital costs of warehousing, chillers, trucks and ongoing operational costs. Unlike some other food waste alternatives, multiple public goods can be delivered simultaneously. Food rescue has a social return investment figure of between 1:3 and 1:14.²

AFRA submits more specific targets, strategies, policies and incentives should be adopted in regards to food rescue.

¹ <https://environment.govt.nz/what-government-is-doing/areas-of-work/waste/reducing-food-waste/>

² AFRA is currently working with University of Otago researchers finding a definitive SROI figure for New Zealand.

Key recommendations

Set food waste and rescue targets	
Food waste and rescue targets	<ul style="list-style-type: none"> ● To support food rescue playing a greater role in achieving New Zealand waste and climate goals, it is recommended: <ul style="list-style-type: none"> ○ Set a food waste target in line with the Sustainable Development Goal 12.3 By 2030, halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses. ○ Consistent with the waste hierarchy, set a target by 2030 that 80% of surplus food is redistributed to people and by 2050: 100% of surplus food is redistributed to people.
Actively support food rescue	
National strategy	<ul style="list-style-type: none"> ● Develop a national level food waste reduction strategy and implementation plan. Unlike many countries New Zealand does not have a specific food waste strategy and responsibility is split across various central government ministries and departments and local territorial authorities. ● Continue to increase waste levies to discourage food going to landfill. ● Prohibit food going to landfill by 2030.
Food rescue funding	<ul style="list-style-type: none"> ● Make available operational funding for food rescue organisations. Funding, especially for running costs is a major barrier for the financial sustainability and growth capacity of food rescue organisations. Currently some limited funding has been provided through Ministry of Social Development's Covid-19 response however this was only for two years and the Waste Minimization Fund has been oversubscribed and does not allow funding for the ongoing financial support of existing activities, nor is it for the running costs of the existing activities of organisations. Increasing funding and opening it up for operational costs would increase capacity to rescue food.

	<ul style="list-style-type: none"> ● Open up Emissions Trading Scheme revenue to be recycled for food rescue organisations. ● The Government should investigate tax credits and incentives for food rescue that are available in many countries and review current taxation rules to ensure food donors are not discouraged. ● Establish a fund to encourage greater coverage of food rescue capacity in areas without. ● Continue to fund the Aotearoa Food Rescue Alliance to increase capacity building, best practice, collaboration and advocacy for food rescue organisations.
Data and information	<ul style="list-style-type: none"> ● Data <ul style="list-style-type: none"> ○ Establish a New Zealand definition of food waste or adopt the global definition. ○ Provide greater funding for data gathering, technology and analysis for food rescue. ○ Gather baseline data for food waste in Aotearoa across all industries including food wasted produced upstream, not just at disposal. ○ Develop a national methodology, capture and reporting platform for food waste. ○ Require large food producers and retailers to disclose how their surplus food is disposed of and how much is distributed to people via food rescue. ● Information <ul style="list-style-type: none"> ○ Support greater education and behaviour change campaigns to reduce food waste. ○ Promote the ‘Good Samaritan’ clause in the New Zealand Food Act 2014, which absolves criminal liability if the food is safe at the time of donation, to encourage greater donation.

Background

AFRA members are already contributing to New Zealand’s greenhouse gas reduction measures.

AFRA surveyed its members before the Delta outbreak, to gauge how they had responded to the initial Covid-19 outbreak and key highlights from the previous twelve months are:

- AFRA members in total increased their food distribution in the 2020/21 year by **90%**.
- More than **8,000,000 kg** of food was rescued and distributed by AFRA members over 2020/21.
- This is the equivalent of **24,776,731** meals and it was distributed to over **1000** recipient organisations getting it to people in need.
- The work of food rescue organisations avoided 22,600 tons of carbon dioxide equivalent entering the atmosphere.

Food rescue has arisen as an organised practise across New Zealand only relatively recently in the last decade.

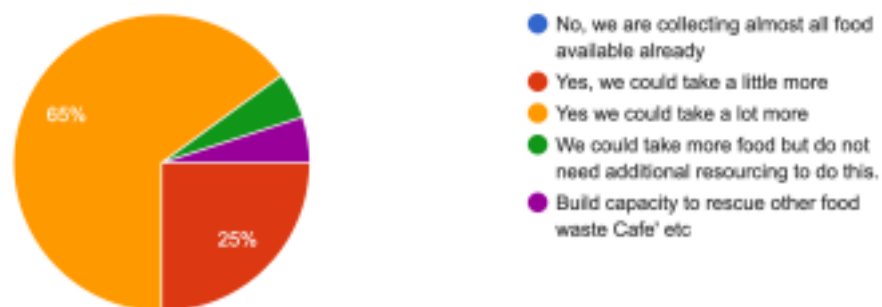
AFRA members report there are vast quantities of food currently uncollected, in effect wasted in New Zealand. This could end up as compost, in animal feed or releasing methane emissions in a landfill. The lowest emission option will always be to use a material at its highest value state - in this case, eaten as food.

Research in 2017 found that supermarkets created 60,500 tonnes of unsold food annually but only 15% was donated to food rescue groups.³

It is estimated every kg of food rescued, avoids 3.5kg of carbon dioxide equivalent entering the atmosphere.

AFRA surveyed its members to see if they were nearing the limits of utilising this resource. 90% indicated they could take more food with additional resourcing, 65% said they could take a lot more.

Could you take more food with more resourcing?
20 responses



³ Champions 12.3 report
https://db921ae9-f665-4304-bd92-a1f22232c2e0.filesusr.com/ugd/d3213e_e626bfcedbae44c5b081a90651a6d427.pdf

Food rescue support

A major barrier to increasing capacity to rescue more food from being wasted is limited and uncertain funding for food rescue operations. Most food rescue organisations operate in precarious financial positions and are reliant on fundraising, local and national grants. The Ministry of Social Development has released two year limited funding under the Food Secure Communities program, which is ending.

AFRA notes the lack of alternative funding sources available in the short to medium term to support their work. Member feedback identified the amount of time grant writing takes from their core work and how in particular funding for operational costs are difficult.

A case could be made for Waste Minimisation Fund (WMF) funding given the avoidance of waste from landfill. However, this fund does not currently cover operational costs and it is oversubscribed - the most recent round saw only \$12m dispersed out of \$150m in applications. The waste levy is increasing but the Waste Strategy needs to be consulted on and confirmed, the Waste Minimisation Act amended by Parliament and strategic funding decisions made all before increased future funding can reach food rescue organisations. Our members have highlighted the uncertainty around timings for the fund which are still unclear. AFRA submits immediate operational funding is required to keep and enhance capacity.

Recommendations

- Make available operational funding for food rescue organisations.
- Open up Emissions Trading Scheme revenue to be recycled for food rescue organisations.
- The Government should investigate tax credits and incentives for food rescue that are available in many countries and review current taxation rules to ensure food donors are not discouraged.
- Establish a fund to encourage greater coverage of food rescue capacity in areas without.

Targets

AFRA is comfortable with the proposed methane targets but notes New Zealand should increase its ambition in light of the methane pledge signed at the Glasgow COP26 and believe food rescue will be an effective partner in reducing emissions.

If all the supermarket food unsold, cited in the 2017 study could be hypothetically rescued,

that would mitigate 211,750 tonnes of carbon dioxide equivalent.

AFRA submits the ERP should develop a specific food target.

Recommendations

- To support food rescue playing a greater role in achieving New Zealand waste and climate goals, it is recommended:
 - Set a food waste target in line with the Sustainable Development Goal 12.3 By 2030, halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses.
 - Consistent with the waste hierarchy, set a target by 2030 that 80% of surplus food is redistributed to people and by 2050: 100% of surplus food is redistributed to people.

Food strategy

Food waste is not only an environmental issue, it is a societal tragedy that good, nutritious food is sent to animal feed or landfill in a country where:

- One in five children in New Zealand live in households experiencing moderate to severe food insecurity
- Almost 40 percent of adults and 19 percent of children in New Zealand don't have enough food.⁴
- About 33 percent of New Zealand adults say they face moderate food insecurity, experiencing uncertainty about whether they'll have enough food, or choosing cheaper, often nutritionally poor items.⁵

As an agricultural producer New Zealand regularly experiences surpluses of a particular food type because of overproduction or cancelled export orders.

Unlike many countries New Zealand does not have a specific food waste strategy and responsibility is split across various central government ministries and departments and local territorial authorities.

A food waste strategy could help break down department barriers and work with producers, retailers, iwi and hapu, local government, NGOs, consumers and food rescue organisations to develop a holistic approach. The United Nations Environment Program recommends strategies based on the target, measure, act framework.

⁴ <https://www.health.govt.nz/system/files/documents/publications/a-focus-on-nutrition-v2.pdf>
<https://www.rnz.co.nz/news/whoseatingnewzealand/447324/calls-to-feed-the-5-million-first-before-exporting-nz-food>

AFRA notes in March 2020 the Environment Select Committee conducted a briefing into food waste and recommended:

- We recommend that the Government adopt a national definition of and measure of food waste, in line with international approaches.
- We recommend that the Government include reducing food waste with a reduction target as part of a national waste strategy and implementation plan.⁶

These recommendations have not been enacted yet and a national food strategy would be a good vehicle to deliver on them.

Recommendations

- Develop a national level food waste reduction strategy and implementation plan.
- Continue to increase waste levies to discourage food going to landfill.
- Prohibit food going to landfill by 2030.

To achieve the outcome of no food going to landfill AFRA notes the need for significant resourcing of food rescue groups to achieve this.

Data and Information

Climate outcomes will be dependent on good data and good policy intention is built on acting on what is measured.

AFRA submits significantly more needs to be done in this space to support the work of those doing the mahi on the ground.

AFRA notes it was unsuccessful for Waste Minimisation funding for a data project and has had to turn to philanthropy for this public good.

Recommendations

- Data
 - Establish a New Zealand definition of food waste or adopt the global definition.
 - Provide greater funding for data gathering, technology and analysis for food rescue.
 - Gather baseline data for food waste in Aotearoa across all industries including food wasted produced upstream, not just at disposal.

⁶

https://www.parliament.nz/resource/en-NZ/SCR_96164/cebeaf7cf20b40245fdf5c60601d83a2ac5b105f

- Develop a national methodology, capture and reporting platform for food waste.
- Require large food producers and retailers to disclose how their surplus food is disposed of and how much is distributed to people via food rescue.
- Information
 - Support greater education and behaviour change campaigns to reduce food waste.
 - Promote the 'Good Samaritan' clause in the New Zealand Food Act 2014, which absolves criminal liability if the food is safe at the time of donation, to encourage greater donation.

Ending food waste to landfill

AFRA supports this proposal raised in the draft ERP but recommends greater public resourcing for food rescue organisations will be the key to achieving it.

AFRA notes overseas, landfill bans are used to control organics being disposed of in landfills and promote sustainable alternatives. The Waste and Resources Action Programme (WRAP) completed a cost-benefit analysis of landfill bans in the UK and found that bans based around organics, metals and glass delivered climate change benefits and resource efficiency gains. In Massachusetts, the state's organic waste ban supported over 900 jobs in the organic waste hauling, processing and food rescue industries in 2016 and generated \$175M in industry activity.⁷

Specific questions relating to AFRA

89. The Commission's recommended emissions reduction target for the waste sector significantly increased in its final advice. Do you support the target to reduce waste biogenic methane emissions by 40 per cent by 2035?

Yes, this is ambitious but will take significant resourcing for those food rescue organisations doing the mahi to achieve it.

90. Do you support more funding for education and behaviour change initiatives to help households, communities and businesses reduce their organic waste (for example, food,

⁷

<https://www.cgcsa.co.za/wp-content/uploads/2021/04/Policy-and-Regulations-Round-Table-Meeting-16-04-21.pdf>

cardboard, timber)?

Yes, we support greater funding for Love Food Hate Waste and similar initiatives.

91. What other policies would support households, communities and businesses to manage the impacts of higher waste disposal costs?

AFRA submits turning an environmental problem - food waste, into a social and economic solution - rescued food is a win-win and should be more actively encouraged and supported.

92. Would you support a proposal to ban the disposal of food, green and paper waste at landfills for all households and businesses by 1 January 2030, if there were alternative ways to recycle this waste instead?

Yes as long as greater public resourcing for food rescue organisations will be available to achieve it. A national strategy and targets need to be in place and the capacity of food rescue groups needs to be increasing in the years prior.

93. Would you support a proposal to ban all organic materials going to landfills that are unsuitable for capturing methane gas?

Yes, ideally no food would go to any landfill.

95. Would you support a more standardised approach to collection systems for households and businesses, which prioritises separating recyclables such as fibre (paper and cardboard) and food and garden waste?

Yes, greater at-source separation would assist food rescue's work. AFRA also supports greater data transparency for large corporations to provide greater system information.

99. What other options could significantly reduce landfill waste emissions across Aotearoa?

Please consider the substance of this submission as a comprehensive answer to this question.

Summary

AFRA welcomes the chance to submit and recommends greater practical policies regarding food waste and food rescue are adopted. AFRA is available for any follow-up consultations or additional information.