

Submission from Community Resources Network Ireland (CRNI) to the Department of Climate, Energy and the Environment on the National Food Waste Prevention Roadmap 2026-2028

CRNI's Key Recommendations

CRNI welcomes the opportunity to respond to the draft National Food Waste Prevention Roadmap 2026-2028. We support its stronger focus on prevention, redistribution, statutory targets and implementation, and believe the final Roadmap can be strengthened further by giving a clearer and better-resourced role to community organisations and social enterprises.

The table below summarises CRNI's priority recommendations for the Roadmap period.

Priority	What CRNI wants
Recognise social economy entities as delivery partners	Explicitly recognise community organisations and circular social enterprises as implementation partners and provide representation on the Food Waste Prevention Task Force.
Fund community redistribution capacity	Implement Action 24 (Food Circle Project recommendations) with a defined timetable and establish predictable multi-annual funding, including the proposed Community Food Redistribution Fund.
Develop community food-sharing infrastructure	Establish a pilot National Community Fridge and Food-Sharing Programme linked to local food hubs and existing redistribution networks.
Remove legal barriers to donation	Prioritise Action 4, which will progress appropriate statutory indemnity for compliant food donors and redistribution organisations.
Match donation obligations with receiving capacity	Ensure implementation of Action 25 (putting in place arrangements for donations agreements to food banks etc.) is accompanied by investment in cold storage, transport, staffing, coordination and capacity building community-based social enterprises and charities.
Use public procurement to prevent waste	Require public food and catering contracts to progressively incorporate food-waste prevention, measurement, redistribution and social-value considerations.

1. 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?

CRNI welcomes many of the initiatives in the draft Roadmap, including new legally binding national food-waste reduction targets applying across specified sectors, explicit attribution of responsibility to coordinating competent authorities, and a commitment to annual review. We strongly agree that prevention should continue to be the top priority under the Food Use and Waste Hierarchy and, therefore, the top priority for Ireland's national food waste prevention strategy.

The Roadmap should operationalise the Whole-of-Government Circular Economy Strategy's commitments to social equity, community-level circular activity and local delivery by explicitly identifying community organisations and social enterprises as delivery partners, with defined actions, resources and representation within implementation structures.

Community organisations and social enterprises can contribute directly to prevention and redistribution through education, behaviour change, food sharing and redistribution, while also supporting appropriate segregation and composting of unavoidable food waste further down the hierarchy:

- It is positive that a system exists for surplus food to reach charities, but there is significant untapped potential for community organisations and social enterprises to contribute more broadly to food waste prevention, including redistribution, education, composting and behaviour-change work at local level. FoodCloud, a CRNI member and key player in the sector and the work behind the draft roadmap, is an important example of the contribution that social enterprises make;
- Funding for community-level redistribution (e.g. community fridge initiatives) and prevention infrastructure remains conditional under the list of recommendations developed by FoodCloud's Food Circle Project ("where possible and feasible", Action 24) rather than committed with a timeline;
- The Roadmap assumes continuing delivery capacity from organisations working on the ground without adequately addressing workforce sustainability. CRNI therefore reiterates the need for multi-annual core funding, rather than reliance on short-term project grants.
- There is no identified role for the social enterprise and not-for-profit sector on the Food Waste Prevention Task Force, whose core membership remains focused on DCEE, DAFM and the EPA. Community based social enterprises are key to educating people, modeling best practice and changing societal attitudes to waste. Consistent with the inclusive implementation approach established under the Whole-of-Government Circular Economy Strategy, CRNI recommends formal representation of social economy and community-sector organisations on the Food Waste Prevention Task Force and relevant sub-sectoral groups.

Addressing these gaps would significantly strengthen the Roadmap's ability to deliver the necessary reductions while also recognising the social, economic and local-community benefits of food waste prevention and redistribution.

2. 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?

CRNI particularly welcomes Action 26 (raising awareness of redistribution and donation platforms), the continued evaluation and strengthening of the National Food Waste Prevention Programme (Actions 6-7), and the clearer legally binding food-waste reduction targets and the work to establish robust sectoral baseline/reference periods. .

CRNI fully endorses the policy recommendations put forward by our member FoodCloud through the Food Circle project and recommends that they be incorporated into implementation of the Roadmap. In particular, CRNI supports a national donation programme, supported by incentives, assistance and practical guidance for organisations involved in donation and redistribution. This should be underpinned by a clear framework including a voluntary redistribution target, standardised measurement and reporting, guidance, fiscal incentives for donations, and financial support for the infrastructure and organisations needed to deliver redistribution effectively.

Action 4 is also commended and CRNI recommends that the examination of an appropriate statutory indemnity for food donors and redistribution organisations be treated as an early legislative priority. Clear liability protection, conditional on compliance with applicable food-safety requirements, could remove a significant barrier to both donation and community redistribution.

CRNI recommends that Action 24 be strengthened by identifying the priority Food Circle recommendations to be delivered during 2026–2028 and assigning each a lead body, funding source and indicative delivery timeframe.

CRNI proposes the following additional actions:

- Regional Waste Management Planning Offices (RWMPOs) have driven important food waste awareness funding to date. Social enterprises and community-based organisations should be formally embedded as delivery partners in this work, given how deeply they are embedded in local communities and the trust they hold.
- Confirmed, scaled-up funding for community redistribution infrastructure should be provided. The Food Circle Report 4 recommendations, including local food hubs, Local Food Coordinator posts and multi-annual core funding, should be committed to with firm timelines, rather than only "where possible and feasible" under Action 24.
- CRNI recommends rebranding Civic Amenity Sites as "Recovery Parks", with extended opening hours, staffed reception facilities, improved signage and layout, and the engagement of local social enterprises in composting and segregation activities on site. This would also provide an opportunity to connect food waste prevention and community education more directly at local level.

- CRNI recommends the development of a National Community Fridge and Food-Sharing Programme as part of the community infrastructure supported under Action 24. Community fridges can provide accessible local points through which safe edible surplus food is shared before it becomes waste, while also acting as focal points for food-waste education, community engagement and local food partnerships. An initial pilot should support community and social enterprise hosts in a representative mix of urban and rural locations. Funding should cover equipment, premises, refrigeration and energy costs, transport, staffing/coordination, training, insurance and ongoing operating costs rather than capital equipment alone. DCEE, DAFM and the FSAI should work with redistribution organisations to develop a common operating framework covering food safety, temperature control, traceability, allergens, date marking, volunteer procedures, donor agreements and measurement. The programme should complement and connect existing FoodCloud, food-bank, food-pantry and local food-partnership infrastructure rather than duplicate it.

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

CRNI suggests promoting campaigns through locally trusted channels, in addition to Stop Food Waste, in particular Public Participation Networks (PPNs) and Civic Amenity Sites, which reach people at the point of engagement with their own waste.

CRNI also suggests co-designing awareness materials with community-based organisations and giving an explicit role to grassroots food waste educators in delivering training and awareness activities, rather than leaving this role generic under Actions 37 and 39. These organisations engage with the public on a regular basis and have a deep understanding of current levels of public knowledge and the barriers people face. Where community organisations are expected to deliver behaviour-change or training interventions under Actions 34, 37 or 39, this role should be commissioned and resourced rather than relying on voluntary participation.

4. 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?

It's important to ensure clear policy alignment and a clear distinction of authority between this Roadmap and other related policies e.g. on circular economy or bioeconomy. The Food Waste Prevention Roadmap should remain clearly focused on preventing food waste and moving surplus food up the food use and waste hierarchy, while related biowaste valorisation measures should complement rather than duplicate or dilute that objective.

CRNI suggests formalising social enterprise and not-for-profit representation on the Food Waste Prevention Task Force, to ensure supply chain inefficiencies affecting the community and redistribution sector are properly captured and addressed.

Public sector food surplus, for example from the School Meals Programme and hospital catering, should be explicitly linked to community redistribution channels, rather than leaving this connection implicit.

5. 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?

While Actions 29-31 recognise funding and support needs, they stop short of committing dedicated, predictable and multi-annual resources to build delivery capacity within social economy organisations. CRNI asks for a dedicated, ring-fenced funding stream for the social economy sector specifically, rather than generic signposting. The funding should be made available on a predictable multi-annual basis and include operational and capital costs.

CRNI recommends establishment of a dedicated annual Community Food Redistribution Fund, building on the Food Circle recommendation for an initial €350,000 annual allocation, together with separate multi-annual funding for regional infrastructure and coordination. Funding should support operational costs as well as capital equipment.

SMEs and social enterprises need more multi-annual core funding rather than short-term or one-off project grants, to allow organisations to build sustainable, long-term delivery capacity rather than reapplying annually. The Roadmap should recognise workforce sustainability as a prerequisite for delivery.

Social enterprises and community-based organisations should be supported to get access to public procurement opportunities through a social procurement lens, alongside the green public procurement measures already set out in the draft Roadmap. CRNI would welcome departmental engagement in this regard. The job creation and employment potential of prevention, redistribution and segregation activity should also be recognised and quantified as part of the rationale for investment decisions.

Public contracts for food and catering should progressively require contractors to demonstrate a food-waste prevention plan, measurement arrangements and, where edible surplus arises, an appropriate redistribution arrangement. Procurement should also facilitate partnerships with community and social enterprise redistribution organisations and recognise social value alongside environmental performance.

**6. 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?

CRNI fully endorses the Food Circle project's recommendation for a national donation framework applying a reasonable-cost test in line with the revised Directive, supported by a voluntary redistribution target, standardised measurement, guidance, fiscal incentives and financial support for organisations involved in donation and redistribution.

Critically, the draft Roadmap does not currently link mandatory donation agreements (Action 25) to the capacity of the organisations receiving that food. If economic operators are required to offer donations, the receiving organisations, many of which are small and volunteer-run, need matching investment in cold storage, transport and staffing to actually absorb increased donation volumes. Without this, there is a real risk of a mismatch between supply and the sector's capacity to receive it.

CRNI recommends that any phasing of obligations on donor businesses be matched by parallel phased investment in redistribution capacity, so that growth in surplus food supply and the community sector's capacity to receive it happen together, rather than the former outpacing the latter.

CRNI supports a phased approach, beginning with economic operators that generate significant volumes of edible surplus and have sufficient operational capacity to establish donation arrangements. Initial application should therefore focus on larger retailers, manufacturers and processors, distributors, contract caterers and major food-service operators. Following evaluation, the requirement could progressively extend to other operators, with proportionate arrangements where volumes are small or redistribution costs would be unreasonable.

We also recommend that public sector food surplus (school meals, hospital catering) be explicitly brought within scope of these donation arrangements.

7. 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?

CRNI strongly supports the introduction of mandatory and proportionate food waste reporting requirements, in line with Actions 3 and 12 of the draft Roadmap.

Implementation should be phased, beginning with Ireland's largest food distributors, supermarkets and restaurant chains, identified by size and turnover. Reporting obligations should not be extended to redistribution and community-based organisations receiving donated food until national scoping work has first been carried out on how to measure impact within the social enterprise and community sector. Introducing these obligations at a later stage will ensure that reporting requirements are properly designed for this sector, and will avoid reporting

burdens becoming a barrier to participation in redistribution, given that many of these organisations are volunteer-run with limited administrative capacity.

Responsibility for reporting the generation and subsequent redistribution of edible surplus should primarily rest with the economic operator from whose supply chain the surplus arises. Redistribution organisations should contribute proportionate data on quantities received and redistributed, supported through appropriate systems and funding, without being treated as the generators of the food waste for donated items that they are subsequently unable to redistribute.

There's a need for improved sector-level food waste and edible-surplus data, which could be partially addressed by separately capturing food redistributed for human consumption.

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

CRNI supports continued industry-consumer initiatives such as Too Good To Go's 'Look-Smell-Taste' labelling campaign. We recommend that any national guidance on date marking be developed in partnership with community-based food waste educators, who engage directly with consumers on this area of confusion and can help ensure messaging is clear, consistent and reaches people who may not engage with digital or mass-media campaigns. "Look-Smell-Taste" messaging must apply only where food safety guidance permits and must never encourage consumers to ignore use-by dates.

9. 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?

CRNI strongly supports our member Food Circle and its recommendations, particularly those addressing community-sector capacity, infrastructure, redistribution incentives and sustainable funding. We consider the following to be priorities for this Roadmap period:

- Establishment of a national donation programme, including a voluntary redistribution target and standardised measurement and disclosure protocols;
- Introduce fiscal incentives to enable food donation, including VAT retention on donated food inputs, a tax credit/deduction for donation and associated logistics costs, and extension of Charitable Donation Scheme relief to in-kind food donations;
- Provide infrastructure and resourcing support for community-level redistribution organisations, capital and operational funding for cold storage, transport and local food hubs, and multi-annual core funding for Local Food Coordinator posts. This is the clearest gap between the scale of the ask on donor businesses and the current capacity on the receiving side, and is directly relevant to Action 24;

- Support for a national compensated agricultural recovery programme, building on the Growers' Project, targeting the redistribution of 5,000 tonnes of surplus per year by 2030.

10. 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?

CRNI calls for improved sectoral classification of food waste activity within social enterprise and community sector data. Food waste prevention and redistribution work currently sits split across DRCD's 'Food, Catering & Hospitality' (2.7% of social enterprises) and 'Environmental Services' (2.6%) categories (DRCD, 'Social Enterprises in Ireland: A Baseline Data Collection Exercise', 2023), meaning the sector's contribution to food waste prevention is not properly captured. CRNI asks that DCEE and the EPA work with DRCD to refine this classification so the community and social enterprise sector's contribution is visible in future Roadmap reviews. Dedicated research and reporting is needed to tie food waste prevention and redistribution actions to measurable GHG emissions reductions, strengthening the link to Ireland's Climate Action Plan commitments and allowing the climate benefits of prevention and redistribution to be properly demonstrated.

Technology development should be focused on:

- ensuring digital interoperability between donation/redistribution platforms rather than proliferation of separate apps;
- forecasting tools to identify likely surplus earlier;
- systems matching supply with local redistribution capacity;
- low-cost temperature-monitoring technology for community fridges and cold chains;
- digital traceability tools proportionate to small community organisations;
- mapping of available community cold storage and transport.

11. Do you have any other comments or feedback on the content of the draft Roadmap?

CRNI reiterates our strong support for food waste prevention remaining the top priority under the Food Use and Waste Hierarchy, and welcomes this being restated clearly in the second Roadmap.

CRNI also reiterates the recommendations made in our 2022 consultation response that have not yet been implemented. We suggest they be looked at again in light of the progress that has been made in circular economy and waste policy since then.

These include:

- Representation for the social enterprise/not-for-profit sector on the Food Waste Prevention Task Force;
- A social procurement lens alongside green procurement;
- Recognition of the job creation and employment potential of community-sector food waste work;
- Firm, scaled-up funding and timelines for community redistribution infrastructure;
- Dedicated GHG accounting for food waste;
- Locally trusted awareness channels through PPNs and Civic Amenity Sites;
- A named role for grassroots food waste educators in delivering training and awareness activities under Actions 37 and 39.

CRNI also recommends that food packaging policy follow the waste hierarchy: avoid unnecessary packaging where feasible; prioritise reusable and refill systems where safe and practical; and, where single-use packaging remains necessary, require recyclability and progressively higher recycled content in line with the Packaging and Packaging Waste Regulation.

CRNI firmly believes that a social and environmental approach that incorporates the work of community-based reuse, repair, redistribution and recycling organisations at every step of the way will be essential to achieving Ireland's food waste reduction targets. We would welcome further engagement with DCEE, DAFM and the EPA as this Roadmap is finalised and implemented.

Conclusion

CRNI believes Ireland will not achieve its statutory food-waste targets through regulation and business behaviour alone. Community organisations and social enterprises already provide trusted local infrastructure for prevention, redistribution, food sharing, education and engagement. The final Roadmap should therefore move beyond recognising this contribution and explicitly resource the sector as a delivery partner.

In particular, CRNI asks that the final Roadmap provide for formal social-economy representation in implementation structures; a defined implementation plan and funding for Action 24; a pilot Community Fridge and Food-Sharing Programme; early progression of the indemnity provisions envisaged under Action 4; and a clear requirement that new donation obligations are matched by investment in community redistribution capacity.