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The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public’s health in Australia.

The PHAA works to ensure that the public’s health is improved through sustained and determined efforts of our Board, National Office, State and Territory Branches, Special Interest Groups and members.

We believe that health is a human right, a vital resource for everyday life, and a key factor in sustainability. Health equity and inequity do not exist in isolation from the conditions that underpin people’s health. The health status of all people is impacted by the social, cultural, political, environmental and economic determinants of health. Specific focus on these determinants is necessary to reduce the unfair and unjust effects of conditions of living that cause poor health and disease. These determinants underpin the strategic direction of the Association.

Our mission as the leading national organisation for public health representation, policy and advocacy, is to promote better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health. Members of the Association are committed to better health outcomes based on these principles.

Our vision is for a healthy population, a healthy nation and a healthy world, with all people living in an equitable society underpinned by a well-functioning ecosystem and a healthy environment, improving and promoting health and wellbeing for all.

The reduction of social and health inequities should be an over-arching goal of national policy, and should be recognised as a key measure of our progress as a society. Public health activities and related government policy should be directed towards reducing social and health inequity nationally and, where possible, internationally.
PHAA submission on Valuing Our Food Waste

Introduction

PHAA welcomes the opportunity to provide input to the consultation draft Valuing Our Food Waste, South Australia’s strategy to reduce and divert household and business food waste.

The Strategy

The Valuing Our Food Waste strategy has been put together to reduce and divert household and business food waste, contributing to national and global targets. The overarching goal of the strategy is to move towards a (biological) circular economy within South Australia, in which food waste is diverted from landfill to make better use of this resource. A circular economy in South Australia could create an additional 25,700 jobs by 2030 and reduce greenhouse gas emissions by 27%.

In South Australia, food waste makes up approximately 22% of total household waste and 26% of commercial and industrial waste. There are two main effects of food loss and waste, including: (1) food insecurity and hunger, and (2) the impact on natural resources and the environment.

This strategy is to be led by Green Industries SA and complements existing policy measures. Frameworks and principles of the strategy include:


The Actions for Change Framework

The Actions for Change Framework includes 38 proposed actions across three domains:

1. **Household**: Food waste arising from the residential sector (actions 1 - 17);
2. **Commercial**: Commercial and industrial food waste (actions 18 – 33);
3. **Attracting and Supporting Investment & Markets** (actions 34 – 38).

While some of the actions have already commenced and are ongoing, many of the proposed actions are planned to be executed between 2020 and 2023.

A Public Health Perspective

From a public health perspective, moving towards a circular economy has important dual human-environment benefits. It offers an avenue for sustainable growth and good health, while protecting the environment and natural resources. The Public Health Association is supportive of South Australia’s strategy to reduce and divert household and business food waste. It will be important to ensure that all actions are inclusive of lower socioeconomic and culturally and linguistically diverse residents/households.
PHAA Response to the draft Valuing Our Food Waste

Household

Proposed actions 1 – 17 pertain to food waste arising from the residential sector. These proposed actions are further broken down into 5 sub-themes:

1. Harmonising and maximising kerbside systems
2. High-density collection
3. Compostable bags to support diversion
4. Home-based approaches
5. Education and awareness

Each sub-theme and the associated proposed actions are addressed below.

**Harmonising and maximising kerbside systems**

Proposed actions include:

1. Continued financial support for the roll out of universal, area-wide high-performing food waste collection systems incorporating a kitchen caddy and compostable bags for diversion through kerbside green organics bins.
2. Research into the use of kitchen caddy systems in council areas where area-wide food waste systems have been implemented, to evaluate behaviour and influence the design of financial support programs to enhance or maintain systems.
3. Work with councils to pilot more frequent collection of household organics bins.
4. As part of a legislative review processes, consider legislative proposals to harmonise council collection systems and introduce a minimum service across all metropolitan Adelaide councils: fortnightly collection of commingled recyclables and fortnightly collection of organics, including food waste.

PHAA believe that continual financial support for the roll out of universal, area-wide, high-performing waste collection systems, incorporating a kitchen caddy and compostable bags, for diversion through kerbside green organics bins is a key action. However, we would like to see specific details on timing of roll out, and which areas these systems will be rolled-out in. Given the successful food waste diversion seen in areas where this has already been implemented, we believe this action should be a priority. Furthermore, the availability of kitchen caddies in ‘opt-in’ areas should be advertised more widely via social media to increase awareness and encourage uptake.

PHAA agree that in the absence of fit-for-purpose infrastructure in the form of a kitchen-based food waste caddy, and sustained education and awareness efforts, the efficacy of this approach is questionable. As such, PHAA encourage ongoing investment in education and awareness to effect lasting behavioural change by individuals and communities. It is particularly pertinent that educational campaigns reach wide-audiences (e.g., via social media and TV campaigns) and that research considers families from diverse cultural and socioeconomic backgrounds.

Rather than ‘consider legislative proposals’, PHAA would like government to commit to harmonising council collection systems to introduce a minimum service across all metropolitan Adelaide.
High-density collection

Proposed actions include:

(5) Pilot and evaluate models of alternative bin and collection systems for high-density dwellings where little or no garden waste is generated.

(6) Update the Better Practice Guide for Waste Management in Residential & Mixed Use Developments in consultation with state government agencies and local governments who reference the guidelines in considering and providing feedback on development applications in relation to waste management.

(7) Development approvals for new or significant high-density developments to require allocation of sufficient area to store and access at least three-bin segregated waste and recycling services and/or vacuum technologies for segregated streams.

Given evidence that housing density is increasing in many areas of metropolitan Adelaide, which limits individuals’ opportunity for diversion of food waste through home-based approaches, we believe that the proposed actions for addressing high-density residential collections are critical. PHAA have some concerns around the privatisation of waste collection in these high-density sites.

Compostable bags to support diversion

Proposed actions include:

(8) Improve households’ access to a supply of compostable bags through council and other avenues.

(9) Support the expansion of the compostable produce bag trial to other retail outlets, particularly where area-wide food waste collection systems have been implemented.

(10) Consider including non-compostable produce bags in the list of single-use plastics items to be phased-out in Turning the Tide on Single-Use Plastics: Next Steps.

PHAA agree that improving households’ access to a supply of compostable bags is important. We are seeking clarification around what the ‘other avenues’ will be to do this.

Expansion of the compostable produce bag trial to other retail outlets is a key strategy for increasing access to compostable bags; however, appropriate education and public messaging would need to accompany this. PHAA suggest implementing this trial in lower socioeconomic areas, where costs and availability may be a significant barrier to engaging in sustainable purchasing.

Rather than considering including non-compostable bags in the list of single-use plastics items to be phased-out in the Turning the Ride on Single-Use Plastics: Next Steps, PHAA request to see a firm commitment to this happening.

Legislation and regulation must require sustainable alternatives to meet a strict definition of ‘sustainable’, to ensure that products labelled as ‘biodegradable’ or ‘compostable’ actually will break down under likely disposal options and within timeframes which are actually sustainable. Health and environmental benefits will not be demonstrated if the conditions required for a product to fulfil its potential as biodegradable or compostable are rarely ever met, or if it still takes years for the process to occur.
Home based approaches

Proposed actions include:

11. Encourage home-based approaches for diverting food waste, including home composting, worm farms and backyard poultry.
12. Provide guidance and education to encourage home and community (including schools) food growing, using compost to improve plant vigour and yield while returning nutrients to the soil.
13. Promote sharing of produce within local communities.

PHAA is supportive of the above proposed actions. However, it would be helpful for the strategy to articulate how home-based and community approaches for diverting food waste will be encouraged and to whom in particular the guidance and education be provided.

PHAA recommends that community education on the keeping of backyard poultry be considered, as there are inherent risks of infectious disease (e.g. Salmonella, campylobacter) when using eggs from backyard poultry.

It is likely that those who engage in community groups (e.g., gardens and food sharing) are already conscious consumers. As such, there is a need to target those who are not engaged with such communities (e.g., a lot of the general public) and are likely to be less aware of, and have less time for, appropriate food waste management.

PHAA propose that a media campaigns consisting of television, radio and social media coverage around the importance of appropriate food waste management are likely to achieve greater reach across the population.

Further, safe sharing of food produce in local communities needs to consider the impact of current and future fruit fly outbreaks.

PHAA recommends that SA Government consider the provision of community grants or subsidies for communities developing community gardens and produce swapping initiatives.

Education and awareness

Proposed actions include:

14. Continue state-wide recycling campaign ‘Which Bin?’ to increase and improve three-bin system recycling, including food waste diversion through the green organics bin and home composting.
15. Working alongside government, not-for-profit and industry partners through the Fight Food Waste CRC, collaborate on a research project to determine effective behaviour change interventions.
16. Develop and implement education and awareness tools that support food waste prevention, reduction and recycling for the residential sector.
17. Partner with community programs and groups to extend food waste prevention messages.

While PHAA applaud the proposed actions’ ability to help divert food waste from landfill, from a public health perspective ‘prevention’ is missing from the Household section of the strategy. An important step is to prevent as much food waste as possible in the first place.

An Australian study found that, in terms of household demographics, Gen Z were the biggest food wasters. Given environmental issues are one of the top concerns for young Australians, appealing to the environmental impacts of food waste could potentially be an effective strategy for reaching this group.
Furthermore, given this group are heavy users of social media, education campaigns would be successful through social media platforms.

The main reasons for food wastage include, not finishing meals, too much food being cooked, uncertainty about safety of food to be consumed, spoilage, short shelf lives, and lacking awareness of environmental impacts. Education and mass media campaigning around cooking appropriate meal sizes, recipes and cooking methods to ‘make the most of’ or use up ingredients, food storage to ensure longevity, shopping routines, and the environmental impacts of food waste should be carried out to assist in the prevention of food waste.

Overall, the issue of food waste (especially prevention) needs to be addressed in the context of consumption. Dietary patterns, cultural factors, attitudes and socio-demographic factors, along with other contributors such as consumer’s food storage facilities, meal planning, shopping behaviour, cooking skills, knowledge of date labelling, and time constraints, play a role on the amount of food that is wasted.

Consumer behaviour change strategies are needed to reduce food waste and shift to diets that are made up of a greater proportion of plant-based foods.

Plant-based diets have been reported as being both healthy and environmentally sustainable, while high consumption of meat and dairy have a negative impact on the environment. The EAT-Lancet report highlighted the critical need for a plant-based ‘healthy reference diet’ to not only support improved health outcomes but to ensure the global population is fed.

Shifting from a ‘Western diet’ to a sustainable diet with fewer animal products has been found to be associated with a decreased environmental footprint (70-80% reduction in GHG emissions and land use, 50% reduction in water use) and a modest decrease in all-cause mortality. Plant-based diets use fewer natural resources than the production of animal-derived foods, as such the associated food waste has reduced environmental impact as well.

Some countries have shifted towards national dietary guidelines beyond just health, which also include environmental sustainability indicators which take into account the impact dietary decisions have on planetary health. This could be an important strategy for increasing awareness around environmental impacts of certain foods and the associated waste. The Australian Dietary Guidelines are currently under review by the National Health and Medical Research Council.

State-wide recycling campaign ‘Which Bin?’ is only effective if all councils have consistent availability of recycling programs, which reinforces the proposed action items (4), i.e. government to commit to harmonising council collection systems to introduce a minimum service across all metropolitan Adelaide.

**Commercial**

Proposed actions 18 – 33 pertain to food waste arising from the commercial and industrial sector. These proposed actions are further broken down into 5 sub-themes:

1. Precinct collections
2. Business food waste prevention
3. Mandatory commercial food waste recycling
4. Food rescue
5. Events and venues

Each sub-theme and the associated proposed actions are addressed below.
Precinct collections
Proposed actions include:
(18) Map food waste generation, to identify potential improved collection densities and more efficient collection.
(19) If mapping and other evidence supports the potential for services improvements to be made, develop and trial an appropriate precinct delivery model.

PHAA are supportive of this concept.
PHAA believes that SA government coordination would be required for the mapping exercise as collaboration by private waste collectors would present logistical (e.g. how different private waste collectors would collaborate to follow these maps? Who would get what collection route?) and financial barriers.

Business food waste prevention
Proposed actions include:
(20) Develop toolkits and resource packs for business incorporating:
- avoidance and lean-production messaging
- tools to measure and report food waste at key generation points (spoilage, preparation, plate scraping) to identify opportunities
- waste contracting information and guidelines
- menu design tips - information on compostable food service ware, including disposal information
- resources to measure, prevent and divert food waste - best-practice case studies.
(21) Pilot the promotion and roll-out of a business resource tool kit to relevant industry bodies and establish a dedicated contact to support businesses introducing avoidance and reduction measures through the Circular Economy Business Support Program.

This strategy would benefit from Government incentives for restaurants and other food businesses to increase the efficiency of their food utilisation and reduce their food waste. We recommend government consider methods of piloting the promotion and roll-out of a business resource kit to, not only relevant industry bodies, but also to food businesses and restaurants across the state.

Food rescue
Proposed actions include:
(28) Expand grants available to food-rescue organisations for collection and distribution infrastructure to increase volumes of food redistributed to those in need.
(29) Review the funding available through government agencies to support diversion and redistribution of surplus food.
(30) Identify opportunities for and barriers to recovering and distributing surplus food through food rescue organisations, including where supply chains may be impacted (e.g. during emergency or disaster events).

PHAA is supportive of these strategies but would encourage a system to ensure that nutritious food is provided to those in need (as opposed to just processed foods).
Food waste is a worldwide challenge which has environmental, economic and social impacts. Food rescue provides opportunities to achieve improved environmental, economic and social outcomes. As per the ‘Valuing our Food Waste Consultation Draft’, the average time vulnerable Australians experience food insecurity, and therefore rely on food rescue and food relief organisations, is 7 years. The quality of food provided, can therefore have a long-term health impact, either protecting health or contributing to the development and/or progression of chronic conditions in an already vulnerable population.

The PHAA commends the Department for Health and Wellbeing and the Department of Human Services for developing the South Australian Food Relief Charter and the Nutrition Guidelines for the Food Relief Sector in South Australia, and encourages Green Industries SA to work with these Departments to not only focus on food security, but also nutrition security. Food and nutrition security exist when all people at all times have physical, social and economic access to food, which is consumed in sufficient quality and quantity to meet their dietary needs and food preferences, and is supported by an environment of adequate sanitation, health services and care, allowing for a healthy and active life.

Ultra-processed foods are low in nutritional value, however have a high energy density. Ultra-processed foods and beverages significantly increase the risks of noncommunicable diseases, and most causes of mortality. Ultra-processed foods sit within the ‘discretionary food and drink’ group within the Australian Dietary Guidelines. Beyond human health, the manufacture of discretionary food and drinks by the food industry make the largest contribution to cropland scarcity footprints, highlighting the need to reduce the excessive development, production and consumption of discretionary foods.

Food industry and supermarkets often donate food to food rescue organisations and food relief service delivery organisations as part of their Corporate Social Responsibility commitments. As per the Western Australia Council of Social Services (WACOSS) Interim Report and Recommendations to develop a Food Relief Framework for Western Australia, food rescue organisations and food relief service delivery organisations reported that “not all food moving through the food relief system was nutritious”. The donation of excess discretionary foods, under the guide of Corporate Social Responsibility is putting the long term health of people experiencing food insecurity at risk. PHAA encourages Green Industries SA to work upstream, with food manufacturers, to increase the amount and supply of nutritious food waste available to food rescue organisations and food relief service delivery organisations to meet demand (70% GREEN foods as per the Nutrition Guidelines for the Food Relief Sector in South Australia), and limit the availability and excess production of discretionary (often ultra-processed) food and drinks.

**Events and venues**

Proposed actions include:

- (31) Update the Waste Minimisation Guide for Events and Venues, including tools for event managers and retailers to maximise waste and recycling performance, and additional guidance on food service ware to increase food waste recovery.
- (32) Encourage councils to adopt segregated bin systems for council-run events and require minimum three-bin systems event permits.
- (33) Through the Turning the Tide on Single-Use Plastics: Next Steps and legislative measures, phase out specified single-use plastic service items and replace with re-usable or compostable alternatives.

PHAA support the proposed actions related to events and venues.

PHAA would like to see mandatory adoption of segregated bin systems for council-run events and requirement of minimum three-bin systems event permits, rather than ‘encouragement.’
Conclusion

PHAA supports the broad directions of the Valuing Our Food Waste strategy. However, we would like to emphasise the following points in our submission:

- While all proposed actions are well-thought out and will make a positive impact, some of the language used throughout the strategy could be strengthened from passive/non-committal (e.g., consider, encourage, review, map) to action-oriented language. Given the document largely outlines best practice approaches to food waste management, PHAA wish to see greater commitment to the execution of these actions and changes, alongside detailed plans, rather than further consideration or scoping of options.
- The strategy highlights many well-planned proposed actions to divert food waste from landfill and ultimately support a (biological) circular economy in South Australia. However, the prevention of food waste is an important aspect that requires more emphasis throughout the strategy. This includes mass media campaigns around the environmental impacts of food waste (thus encouraging individuals to be more mindful of wasting food) and how food waste can be managed appropriately if it is unavoidable. Further, changing consumption patterns by beginning to normalise sustainable plant-based diets is important for improving both human and environmental health.
- PHAA also suggest working towards a shift in national dietary guidelines beyond just health information, to also include environmental sustainability indicators which take into account the impact dietary decisions have on planetary health.
- It will be important to ensure that all actions are inclusive of lower socioeconomic and culturally and linguistically diverse residents/households.

The PHAA appreciates the opportunity to make this submission commends South Australian Government on developing this strategy, which if enacted, will play an important role in our sustainable future and public health more broadly.

Please do not hesitate to contact us should you require additional information or have any queries in relation to this submission.

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28 August 2020
References