

Comment from Kai Commitment to the Ministry for the Environment on the release of New Zealand's first national Food Loss and Waste Baseline measurement

To: Ministry for the Environment | Manatū mō te Taiao

Cc: Ministry for Primary Industries, Ministry of Education, Ministry of Social Development, Ministry for Business, Innovation & Employment

We acknowledge the Ministry for the Environment | Manatū mō te Taiao and the University of Otago team for leading this important milestone. We write to offer insights to support ongoing policy development and momentum on this issue.

Our role and basis for comment

As the convenor of the Kai Commitment Programme for New Zealand, we support businesses to measure and reduce food loss and waste across major supply chains. Our insights draw on:

- operational measurement across large food-sector companies
- delivery of sector-level projects
- market-level intelligence on opportunities to prevent and reduce food loss and divert it to higher-value destinations

Key observations on the FLW Baseline findings

1. Significant data limitations

The Food Loss and Waste Baseline (FLW Baseline) report notes major data gaps, including in primary production, fisheries, hospitality and institutions and food service, as well as limited data on all destination pathways. This resulted in heavy reliance on international data sets and assumptions or incomplete data.

Implication: Our view is that while the findings provide valuable directional signals, the FLW Baseline should be interpreted with care. International comparisons or percentage baselines are premature, and future baselines must be strengthened through improved, NZ-specific measurement.

2. Scale of loss and waste

The results show 1.22 million tonnes of food loss and waste in disposal destinations, including significant volumes in landfills (18%), again noting significant data accuracy limitations.

Wastewater appears to be excluded as a destination, despite its known relevance for food and beverage businesses and its methane implications.

Implication: Large volumes of organic material flowing into low-value disposal pathways represent both economic loss and avoidable emissions. Policy settings need to address costs and systemic barriers to higher-value destinations (including pricing, infrastructure, product specifications) *and* prioritise the prevention of waste and its circular use to align New Zealand with global expectations of management of organic material. This is a major opportunity for cost savings, emissions reduction, and productivity gains.

3. Large volumes diverted to non-food uses

Of the 3.48 million tonnes measured as not eaten as intended, 2.26 million tonnes enter non-food reuse or recovery pathways (e.g. animal feed, bioprocessing, composting, anaerobic digestion). While these pathways are appropriate for inedible material or high-value co-products, the results indicate that substantial volumes of saleable and often edible food are routinely diverted away from human consumption.

Our experience (including bakery supply-chain food waste mapping) suggests that these food flows are driven by structural constraints rather than genuine circularity (e.g., specifications, cost-to-donate, infrastructure, and commercial realities).

Implication: A system-level review of these market outcomes would inform policy settings designed to keep food in the human food chain wherever possible, maximising economic, social, and environmental value.

4. High edible food loss and waste

Estimated edible food losses are high. Based on high-level assumptions, approximately 79% of food lost (581,788 tonnes) at primary production is edible, and 85% (54,736 tonnes) of edible food is wasted at the wholesale/retail stage, while 52% (190,370 tonnes) of food wasted by households is edible. Edible losses represent lost economic, social and environmental value to our businesses and communities.

The drivers of edible losses are often system-driven (e.g. grading, pricing, harvesting costs, labour, forecasting, contractual requirements, consumer behaviour, food safety requirements, and other market conditions). International evidence shows that primary producers cannot address these system issues alone, and yet multiple solutions are well understood.

Implication: Reducing edible food waste helps to resolve multiple economic, social, and environmental policy challenges. Government support is needed to correct current market outcomes to ensure more food is sold or donated. Some international policy solutions include:

- Industry-level measurement and root cause analysis.
- Sector collaborations (such as gleaning, rescue partnerships).
- Secondary domestic market development.



- Review of date labels and food safety requirements.
- Consumer awareness or behaviour change.

5. *Upstream losses*

The results record primary production (37%), processing (27%), although this data is heavily caveated as containing gaps and reliance on Australian data. The researchers note that reducing food loss and waste in primary production would involve changes in downstream activities (e.g. consumer expectations and handling systems).

Implications: Again, these results indicate system-level drivers of food loss and waste in the primary and processing sectors – and the need for policy support to identify the scale and drivers of waste at a commodity level. International case studies indicate that whole supply-chain collaboration is critical to achieving reductions in primary production waste.

6. *Extremely low redistribution*

Only 0.4% of food leaving the human food supply chain is redistributed to people, low compared to the available edible food that is being wasted.

Implications: Policy levers (e.g. research, tax settings, donation infrastructure, education) could materially improve redistribution outcomes.

Support for recommendations

The report's recommendations are strongly aligned with our work. We fully endorse them and offer support in the Ministry's next steps:

- *Strengthen definitions and measurement frameworks:*
We use an internationally aligned definition and can share learnings from consultation with industry and operational applications across sectors. We also led the consultation for the current definition (including making the same recommendation as the researchers on non-food recycling destinations).
- *Prioritise NZ-specific data and sector collaboration*
We strongly agree that priority sectors need support to understand drivers from farm to fork. We can convene businesses and share anonymised insights.
- *Commission commodity-level research*
Our [bread supply chain food loss and waste](#) work demonstrates the value of commodity studies. We can share our methodology and findings.
- *Establish a regular national monitoring cycle*
We recommend a three-year FLW Baseline cycle supported by aggregated Kai Commitment reporting to safeguard commercially sensitive information is an effective arrangement for improving national FLW data.
- *Develop guidance and resources for businesses*
We support and contribute to industry-level capability building. Our open-source [Kai Commitment tools and resources](#) and [Best Practice Business Food Waste Actions](#) are actively used by industry.



- *Pathway toward mandatory measurement*
We support a staged transition. Signatories already experience significant financial, social and environmental gains from measurement of food loss and waste – previously often invisible within their businesses. We can advise on industry readiness and operational implementation.
- *Create a central hub for FLW data*
This aligns with previous [PMCSA guidance](#). Our measurement framework could inform design to ensure alignment with international best practice.

Conclusion

We would welcome the opportunity to meet and discuss the findings and our comments further if that would be helpful, as we continue our mission to ensure food in Aotearoa is valued and not wasted.

Ngā mihi nui,



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