



Mr John Ryan  
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3 June 2025

Dear Mr Ryan,

**Re: Inquiry into the School Lunch Programme – Food Waste Measurement and Monitoring**

We write in response to your announced inquiry into the school lunch programme, to be conducted under section 18(1) of the Public Audit Act 2001. We believe this inquiry presents an important opportunity to examine how food waste is being measured and managed within the school lunch programme, and request that food waste be considered within the inquiry's scope.

New Zealand Food Waste Champions 12.3 (NZFWC) is a national non-profit organisation focused on implementing global best practices to reduce food waste throughout Aotearoa's food system, from farm to fork, for a more sustainable food future (as per UN SDG 12.3). We advocate for food waste reduction to be more central to the government's food systems policies as a powerful lever for boosting food security and reducing environmental harm.

**Relevant context**

NZFWC notes the government's incorporation of a Key Performance Indicator (KPI) on food waste into its procurement process for the Alternative Provision Model for Ka Ora, Ka Ako | Healthy School Lunches Programme in 2024. The 2024 Procurement Plan specifically sets out that it is concerned with opportunities to 'reduce surplus lunch volumes', 'reduce wasted lunches' and 'maintain a focus on sustainability', establishing 'full solution delivery, including waste disposal'.<sup>1</sup> A specific target of keeping waste/surplus below 7% of the total food provided is included in the plan (p.9).<sup>2</sup>

This aligns with the Prime Minister's Chief Science Advisor's recommendations to the government to leverage government purchasing power (i.e. procurement) 'to enhance the adoption of food waste valorisation (e.g., compost, upcycled food), divert food waste from landfills, and seek opportunities to prevent food waste (C2a), thereby

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<sup>1</sup> Healthy School Lunches Alternative Provision Model MOE27464 [https://web-assets.education.govt.nz/s3fs-public/2025-03/procurement%20plan.pdf?VersionId=9ZcFebcl1DHADWuWn0QwLVnSFkhbn\\_Cr](https://web-assets.education.govt.nz/s3fs-public/2025-03/procurement%20plan.pdf?VersionId=9ZcFebcl1DHADWuWn0QwLVnSFkhbn_Cr)

<sup>2</sup> Office of the Chief Science Advisor (2024) Beyond the Bin, Capturing Value from Food Waste [https://bpb-ap-se2.wpmucdn.com/blogs.auckland.ac.nz/dist/f/688/files/2024/03/Beyond-the-bin\\_Capturing-value-from-food-waste-v2-a51f2bcaceacad42.pdf](https://bpb-ap-se2.wpmucdn.com/blogs.auckland.ac.nz/dist/f/688/files/2024/03/Beyond-the-bin_Capturing-value-from-food-waste-v2-a51f2bcaceacad42.pdf)

demonstrating a commitment to aligning large-scale procurement with broader sustainable procurement goals.

The Auditor General's office will be aware that excessive food waste generated by the school lunches programme is one of the key concerns expressed in several media articles and by school staff since the introduction of the Alternative Model.<sup>3</sup>

We note also the programme was found to need further scrutiny in terms of its sustainability risks and opportunities in a comprehensive policy review conducted by a group of industry experts in 2024.<sup>4</sup>

### Our key concerns

We have several concerns regarding the interpretation, measurement and monitoring of the KPI.

It is unclear how the specific waste minimisation KPI is measured or monitored by the Ministry for Education through the contract period. We understand that the KPI is measured by tracking the lunches returned unopened to the supplier. If this is the case, this will capture only a fraction of the total food waste and excludes:

- **Post-opening food waste:** Substantial amounts are likely wasted after lunch packages are opened by students, including partially consumed meals and unwanted components. This data is not captured centrally and appears to be left out of scope, falling to individual schools.
- **Manufacturing waste:** Food waste during manufacture and preparation should be included in comprehensive measurement frameworks, as per the UN Food Waste Measurement Protocol.<sup>5</sup>
- **Diversion and disposal impacts:** The programme's large scale significantly impacts opportunities for food rescue, composting, and disposal methods. Regarding food rescue, our anecdotal understanding is that uneaten food went home with families in previous programme iterations. However, the new model (in which food is delivered hot) precludes this as it cannot be reheated due to safety concerns. This has the potential to impact the diversion of edible food significantly, increasing landfill waste and subtracting from the broader social impact of the programme. The Ministry's carbon footprint evaluation for 2022 found Ka Ora, Ka Ako emits 71,655 tonnes of CO<sub>2</sub> equivalent annually—the Ministry's third-largest emissions sector.<sup>6</sup> A systems

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<sup>3</sup> Lees-Galloway, I (2025) The Press <https://www.thepress.co.nz/nz-news/360618359/not-so-obvious-cost-failings-school-lunch-programme>; Radio New Zealand (2025) <https://www.rnz.co.nz/news/national/542843/nutritionist-finds-list-of-issues-after-visiting-auckland-schools-delivering-lunch-programme>; New Zealand Herald (2025) [https://www.nzherald.co.nz/nz/education/school-lunch-woes-halal-issues-and-food-waste-hit-west-auckland-schools/MLVXWRFZJVDI3PA5RUT2FKJ7QI/#google\\_vignette](https://www.nzherald.co.nz/nz/education/school-lunch-woes-halal-issues-and-food-waste-hit-west-auckland-schools/MLVXWRFZJVDI3PA5RUT2FKJ7QI/#google_vignette)

<sup>4</sup> McKelvie-Sebileau, P., Swinburn, B., Rees, D., Glassey, R., Tipene-Leach, D., & Garton, K. (2024). Assessing the Potential for School Lunch Programme Ka Ora, Ka Ako to Enhance Education, Sustainability and Health Goals. *Policy Quarterly*, 20(3), 47-48.

<sup>5</sup> UN Food Loss and Waste Protocol, n.d. <https://flwprotocol.org/>

<sup>6</sup> McKelvie-Sebileau et al., 2024

perspective would design disposal pathways to reduce emissions consistent with the government's own methane reduction targets.<sup>7</sup>

Food waste is a systems issue occurring across various parts of the system, and simplistic KPIs do not account for this complexity. If current measurement only captures meals returned to providers, significantly larger amounts of food are likely being wasted unmeasured and unmanaged. A recent academic analysis of the programme found a lack of data on the programme's food waste.<sup>8</sup>

Aside from the procurement terms, the lack of visibility of food waste within the Ka Ora, Ka Ako programme leaves a governance gap in its overall monitoring and assessment. The programme's scale presents both significant environmental challenges and opportunities for targeted waste reduction interventions that could contribute meaningfully to New Zealand's climate and sustainability objectives. We request that your inquiry examine:

1. The adequacy of current food waste KPIs, measurement methodologies and monitoring protocols.
2. Whether broader KPIs should capture waste across all supply chain stages, including in school levels.
3. Adequately design the programme from farm to fork and disposal to measure and manage the whole food waste system from the Ka Ora, Ka Ako to meet the government's procurement standards.
4. Environmental, social and economic implications of current food waste levels within the Ka Ora, Ka Ako programme and potential opportunities to design interventions to address these to improve food security, economic and environmental outcomes.

NZFWC would welcome the opportunity to provide further input to your inquiry. Thank you for considering these important matters.

Yours sincerely,

Kaitlin Dawson

Executive Director

New Zealand Food Waste Champions 12.3, Kai Commitment

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<sup>7</sup> Ministry for Environment (n.d) <https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/emissions-reductions/emissions-reduction-targets/new-zealands-projected-greenhouse-gas-emissions-to-2050/#:~:text=Aotearoa%20New%20Zealand's%20domestic%20target%20under%20the,below%202017%20biogenic%20methane%20emissions%20by%202030>

<sup>8</sup> McKelvie-Sebileau et al., 2024