

Have Your Say on Options to Reduce Emissions from Organic Waste: MfE/MCERT Sector Feedback Document

1) General questions on business food waste reduction and recovery

a) What existing initiatives are you or your sector working on to reduce food loss and waste, and to keep organic materials out of landfill

Kai Commitment is New Zealand's voluntary agreement for reducing food loss and waste across the food supply chain. We work with businesses to help them measure, prevent and reduce food waste through a collaborative, evidence-based approach.

Current initiatives include:

- Supporting participating businesses to measure and report food loss and waste, establishing baselines and tracking progress over time.
- Working with members to identify and implement food waste prevention and reduction initiatives within their operations and supply chains.
- Facilitating knowledge sharing and collaboration between businesses to accelerate the adoption of effective food waste reduction practices.
- Supporting the redistribution of surplus edible food through collaboration with food rescue organisations where prevention is not possible.
- Producing sector insights, case studies and guidance to build capability and encourage the uptake of best practice across the food industry.
- Collaborating with government, industry and research partners to improve understanding of food loss and waste and identify opportunities for system-wide action.

Our focus is on preventing food loss and waste at source wherever possible, with surplus food redistribution and other diversion pathways forming part of the food recovery hierarchy when prevention is not achievable.

b) Are you measuring and reporting food loss and waste?

No.

As an independent organisation, Kai Commitment does not generate food waste as part of our operations and therefore does not measure or report organisational food waste.

However, measurement and reporting are central to our work. Through the Kai Commitment voluntary agreement, we support participating businesses to measure and report their food loss and waste using a consistent methodology. We aggregate and analyse this data to provide participating businesses with meaningful insights into where food waste is occurring and opportunities for reduction.

This aggregated data also enables sector-level benchmarking, helps track progress over time, and provides an evidence base to inform industry action and government



policy. It demonstrates the scale of the opportunity, substantiates the value of coordinated food waste reduction efforts, and helps identify where interventions can deliver the greatest environmental, social and economic impact.

c) What challenges or needs do you have in further reducing food waste and keeping organic materials out of landfill?

As an independent organisation working across the food system, we see that the biggest challenges are not technical, they are coordination, capability, investment, and awareness of the opportunity.

Many businesses are operating in a challenging economic environment, with competing priorities and constrained resources. While reducing food waste can deliver significant financial, operational and environmental benefits, many organisations do not yet recognise the scale of the economic opportunity or have the data needed to build a compelling business case for action. As a result, investment decisions are often focused on short-term priorities rather than longer-term opportunities to improve productivity, reduce costs and build resilience.

Key challenges include:

- **Limited national coordination**, resulting in fragmented efforts and missed opportunities to share knowledge and scale successful initiatives across sectors.
- **Inconsistent measurement and reporting**, making it difficult for businesses to understand where food waste is occurring, quantify its cost, benchmark performance, and identify the greatest opportunities for improvement.
- **Limited capability and resources**, particularly for organisations that want to reduce food waste but need practical guidance, tools and support to get started.
- **Competing business priorities**, particularly in the current economic climate, which can make food waste reduction appear less urgent despite its potential to improve productivity, reduce costs and strengthen business resilience.
- **Insufficient investment in supporting infrastructure**, including systems to manage unavoidable food waste and keep organic materials out of landfill.

Greater investment in measurement, collaboration and coordinated national leadership would help businesses better understand the value of reducing food waste, unlock productivity gains across the food system, and deliver economic, environmental and social benefits for New Zealand.

d) Please outline any other suggestions (aside from the options outlined below) that could help your business and/ or sector reduce food waste and divert it from landfill.

Develop a broader National Food Strategy that sits above food waste policy. While a food waste reduction action plan focuses specifically on waste outcomes, a national food strategy would take a wider food system view, integrating food production, supply chains, nutrition, resilience, environmental outcomes and economic



performance. This would help align food waste reduction with wider government and industry priorities and ensure more coordinated decision-making across the entire food system.

1.1 Do you support the option to create a national action plan to reduce food waste?

Yes

We support a national action plan to reduce food waste.

A coordinated plan would help address current fragmentation across government and industry and improve alignment across policy, capability and infrastructure investment. In particular, we see value in a cross-government approach that reduces siloed activity and ensures a more integrated view of food system outcomes. Co-design with both industry and government would be important as it enables shared ownership and brings together practical experience and policy leadership to ensure it fully reflects the real-world needs, constraints, and gaps across the system.

Ideally, this would sit within or inform a broader national food strategy, ensuring food waste is addressed alongside wider food system priorities. If developed first, the action plan would also provide an important foundation to shape that strategy.

A national action plan could:

- Provide clear system-wide direction for food waste reduction
- Align policy settings, industry action and infrastructure investment (including collection, redistribution and organic waste processing capacity)
- Strengthen coordination across sectors and points in the value chain
- Support consistent measurement and reporting
- Enable scaling of prevention and diversion solutions

Overall, it would help accelerate coordinated action and better connect prevention efforts with the infrastructure required to divert unavoidable organic material from landfill.

1.2 Do you support the option to establish a government–industry working group on food waste?

Yes

We support the establishment of a government–industry working group on food waste.

Food loss and waste is a cross-cutting issue across multiple government portfolios and the food system. While officials already meet periodically across agencies to



share updates on food-related workstreams, a dedicated forum that also includes industry and focuses specifically on food waste would strengthen coordination and strategic alignment.

This would build on existing foundations by enabling more collaborative planning, improving visibility of system-wide activity, and supporting more coordinated action across the food supply chain. It would also help identify unintended consequences of policy or operational changes that may benefit one part of the system while creating challenges for another, such as shift food loss and waste elsewhere in the supply chain rather than preventing it.

We see value in a working group that:

- Brings together government agencies and industry in a structured forum
- Aligns policy development with implementation realities
- Shares data, insights and progress across the system
- Improves understanding of trade-offs and unintended consequences
- Supports more coordinated, evidence-based decision-making

Overall, this would help strengthen system coherence and accelerate practical progress in reducing food waste.

1.3 Do you support the option to compile research on barriers to food waste reduction and educate businesses on how to address them?

Yes

We support compiling research on barriers to food waste reduction and educating businesses on how to address them.

We recommend that this includes a gap analysis of existing local and international research to avoid duplication and focus effort where there are genuine knowledge gaps. The emphasis should then shift to practical, sector-based pilots that generate real-world case studies and guidance resources.

Importantly, this work should both identify key barriers and present practical solutions, helping businesses understand not only what is preventing progress but also what actions can realistically address those challenges in practice.

The findings should also inform wider system-level interventions, recognising that many barriers cannot be addressed by businesses alone. Research should be used to guide policy development, regulatory settings, infrastructure investment, and other mechanisms that enable food waste reduction across the system.



This approach would ensure research is directly translated into implementation support, enabling businesses to move from awareness to action and better recognise the economic and operational benefits of food waste reduction.

1.4 Do you support the option to share voluntary templates for planning food waste reduction and diversion?

Yes

We support the option to share voluntary templates for planning food waste reduction and diversion.

Kai Commitment has developed a standardised methodology, with clear definitions, practical templates and guidance to support consistent food waste measurement. The methodology is supported by automated dashboards that highlight food waste hotspots, quantify the opportunity, and help businesses move from measurement to targeted action and diversion planning. providing businesses with a suite of practical tools to complement measurement and build capability across the wider food waste journey, from identifying opportunities and prioritising actions through to implementation, monitoring, and diversion planning.

We see value in templates that are simple, adaptable across sectors and business sizes, while recognising that sector-specific guidance may be needed to reflect the unique challenges and opportunities within industries such as dairy, meat, horticulture, hospitality, food service, manufacturing, and retail. Practical case studies and examples of successful implementation would further support uptake.

Where appropriate, New Zealand should also build on proven international tools and best practice, adapting existing resources for the local market rather than developing new approaches from scratch. Building on existing tools and voluntary initiatives would encourage greater consistency, reduce duplication, strengthen business capability, and accelerate the uptake of food waste reduction practices across New Zealand's food system

1.5 Do you support the option to produce a nationally consistent, voluntary food waste reporting framework for businesses?

Yes

We support the option to produce a nationally consistent, voluntary food waste reporting framework for businesses.

Consistent measurement and reporting is a critical enabler of effective food waste reduction. It improves visibility of where food loss and waste is occurring, provides valuable insights and benchmarking, and helps businesses identify performance improvement and cost-saving opportunities.



A standardised approach would also enable global comparability, supporting New Zealand exporters to align with emerging international reporting expectations and understand how they compare with peers in overseas markets.

Our experience has shown that businesses often measure waste differently for internal operational purposes than under a standardised food waste methodology. Adopting a consistent framework changes the lens through which food waste is viewed, revealing the true scale of the economic, environmental and operational opportunity while supporting more informed decision-making.

The ability to benchmark performance against peers, both nationally and internationally, is also a powerful driver of continuous improvement and action.

1.6 Do you support the option to provide updated guidance to businesses on managing unavoidable organic waste?

Yes

We support providing updated guidance to businesses on managing unavoidable organic waste.

Clear, practical guidance would help businesses make informed decisions on diversion pathways once prevention options have been exhausted. This should be supported by decision tools based on waste types, volumes and logistical considerations, as well as a directory of regional processing and diversion options to improve visibility of available infrastructure. This could also be developed as a regional extension of our existing ecosystems map.

We also see value in supporting greater collaboration between businesses to aggregate volumes where this enables more viable recovery solutions.

Overall, this would improve decision-making, strengthen use of existing infrastructure, and support greater diversion of organic waste from landfill.

1.7 Which options would have the most impact and should be prioritised for implementation? Please rank from 1 (highest priority) to 6.

1st 1.2 Establish a government–industry working group on food waste

Critical for cross-agency and cross-sector coordination, ensuring implementation is aligned, insights are shared, and unintended consequences are identified early.

2nd 1.1 Create a national action plan to reduce food waste

A national action plan provides the strongest system-wide coordination mechanism and is the key enabler for aligning government, industry, data, and infrastructure investment.



3rd 1.5 Produce a nationally consistent, voluntary food waste reporting framework for businesses

Strong foundation for improving measurement consistency, enabling benchmarking, and building a robust national evidence base to inform action and investment.

4th 1.6 Provide updated guidance to businesses on managing unavoidable organic waste

Important for improving diversion outcomes where prevention is not possible, and for better use of existing and emerging infrastructure.

5th 1.3 Compile research on barriers to food waste reduction and educate businesses on how to address them

Valuable for identifying constraints and translating insights into practical, sector-relevant solutions that support business action.

6th 1.4 Share voluntary templates for planning food waste reduction and diversion

Useful enabling tool, but most effective once stronger coordination, data, and guidance systems are in place.

1.8 Please provide any additional examples or evidence related to reducing or diverting food waste in your business/sector that you would like to share.

Fonterra – [Moving Food Waste Up the Waste Hierarchy](#)

Woolworths – [Embedding Food Waste Reduction into BAU Through Technology and Culture](#)

Foodstuffs – [Harnessing AI to Reduce Food Waste Through Stock Optimisation](#)

Kai Commitment – [2026 Impact Report: Evidence Base](#)

2) Supporting councils to implement or enhance kerbside organic services

We are not submitting on these as they are asking for council feedback.

3) Enabling organic processing solutions, including biogas

a) What factors do you think are most important when selecting an organic waste processing solution?

The most important factors in selecting an organic waste processing solution are how effectively the material can be prevented, recovered, or redirected to its highest-value use, and how well the solution performs within the local system context. This includes understanding the composition and quality of organic



material, and first considering opportunities for prevention, redistribution, or alternative use before treatment. Where processing is required, decisions should be grounded in what infrastructure exists locally, what can realistically be scaled, and how well systems can be integrated across councils, businesses, and sectors. Improved tracking of organic waste flows would further strengthen this by enabling better visibility of volumes and movement over time, supporting more accurate forecasting and ensuring future infrastructure needs are appropriately planned and invested in.

A systems-based approach also requires decisions to be based on full environmental, economic, and practical outcomes rather than single-point solutions. This includes prioritising overall environmental outcomes by considering greenhouse gas emissions (including avoided landfill methane), water use, energy use, land use, and resource efficiency, alongside economic viability and the ability to recover value through energy, nutrients, or soil benefits. It also requires consideration of unintended consequences such as transport emissions, contamination risk, or inefficient use of infrastructure. In practice, this means prioritising solutions that strengthen regional circular systems rather than optimising individual disposal pathways.

From a Kai Commitment perspective, effective decision-making would be strengthened through coordinated national and regional frameworks that support consistent, evidence-based choices across the system. This aligns with the need for shared data, baselines, and sector coordination to enable more informed investment and infrastructure planning.

b) What data or information do you think would be most useful to support decision-making on organic processing solutions?

Decision-makers mainly need simple, practical information that helps them understand what options are available in their area and what each option means in practice.

That includes:

- What facilities or processing options are available nearby
- What types of organic waste each option can accept
- What it will cost to collect, transport, and process the waste
- What the environmental impacts are (e.g. emissions, landfill avoidance)
- What the benefits are (e.g. energy, compost, fertiliser) and any by-products
- How far the waste needs to be transported
- How the options change depending on the season or waste volumes
- Any longer-term impacts or unintended consequences of choosing that option



In simple terms, people need to know: *what can I do with this waste locally, what will it cost, what will it produce, and what are the environmental trade-offs over time.*

c) Could improved data from anaerobic digestion and composting facilities (i.e., from a voluntary reporting scheme) help inform decision-making on organic waste processing solutions? If so how?

Yes.

If this information were collected consistently through businesses reporting at a regional level (rather than only nationally), it would give councils and businesses a much clearer picture of what organic waste is being produced, where it is going, and how it is currently being managed. It may also help identify barriers to adoption, such as cost, logistics, or lack of suitable local infrastructure.

This would help decision-makers:

- Identify gaps in local infrastructure and where investment is needed
- Understand the true flow of organic waste across regions (not just what is landfilled locally)
- See where existing facilities are underused or where capacity constraints exist
- Make more informed choices about future infrastructure planning and investment

In simple terms, better shared data would make it easier to match organic waste with the right processing solution in the right place, reduce reliance on default disposal, and avoid unnecessary long-distance transport.

d) Please outline any other suggestions (aside from the options outlined below) that could help enable organic processing solutions, including biogas.

Yes.

One additional suggestion would be to better integrate emissions reporting into organic waste decision-making, particularly in relation to Scope 3 emissions for businesses.

If emissions data was easy to understand and businesses could clearly see the benefit of moving organic material from one destination to another, it would help decision-makers and businesses understand the full carbon impact of different disposal and processing options. This would make the emissions consequences of organic waste more explicit, rather than being an indirect or overlooked factor.

This could also strengthen incentives for action by:



- Helping businesses understand how organic waste contributes to their Scope 3 emissions
- Highlighting the carbon cost of landfill disposal versus alternative processing pathways
- Supporting more consistent decision-making that aligns with climate and waste reduction goals

In simple terms, linking organic waste data with emissions reporting would make the climate impact of decisions clearer, and support more informed choices about reducing waste and investing in better processing solutions.

3.1 Do you support the option to map local infrastructure gaps and opportunities for diverting organic?

a) Yes, we support the option to map local infrastructure gaps and opportunities for organic diversion. This is an important step to improve visibility of what infrastructure exists, where gaps are, and why certain organic waste streams are not being effectively utilised. It would help decision-makers, including government and local councils, better understand regional constraints and investment needs, while also supporting more consistent and coordinated planning across the system. It would also improve transparency for end users by showing what options are realistically available for their organic waste in their local area.

b) Please share any further thoughts or ideas on this option.

In addition to this, we would suggest developing this further into an easy-to-use, interactive directory or platform for end users. This could allow businesses to easily identify what processing options are available in their region based on the type of waste they have. It could build on a regional version of our ecosystem map for resource recovery, improving accessibility of information and supporting more practical, real-time decision-making.

3.2 Do you support the options to provide more information on biogas through a waste lens, including updated waste-to-energy guidance?

Yes,

We support providing more information on biogas through a waste lens, including updating waste-to-energy guidance. It is important that decision-makers and businesses have a clear understanding of the range of available organic processing options and how these contribute to both environmental and economic outcomes.

Biogas has a valuable role within a circular system, whether produced on-site or at regional facilities, as it enables organic waste to be converted into energy that can be used locally or fed back into the grid. In addition to environmental benefits such as



emissions reduction and landfill diversion, the guidance should clearly position biogas within the waste hierarchy, recognising it as an important option for unavoidable organic material, while helping users consider economic factors, system efficiency, and broader sustainability outcomes when assessing the most appropriate option.

We also suggest that updated guidance includes other biological energy pathways, such as biofuels derived from organic material, to ensure decision-makers are aware of the full range of technologies available and how they may apply in different contexts.

3.3 Please provide any additional examples or evidence related to organic processing solutions that you would like to share.

No