SUMMARY OF PUBLIC CONSULTATION

VM0046 Methodology for Reducing Food Loss and Waste, v1.0

A draft of *VM0046 Methodology for Reducing Food Loss and Waste, v1.0* was open for public consultation between 8 March 2022 and 24 April 2022. This document includes a list of each comment received and the developer's response.

KEY QUESTIONS

Q1: For prospective project proponents, what types of food loss and waste (FLW) reduction activities would you be interested in including in a VCS project? Please describe where the activities take place and by what means FLW is reduced.			
#	Organization	Comment	Developer's Response
1	Apeel Sciences	These comments are from the perspective of a technology/service provider with offerings to extend the shelf-life of fresh produce. Apeel's plant-derived coatings are applied in the upstream supply chain (i.e., a post-harvest application in the fresh produce packinghouse). Once the coating is applied, it slows down the rate of water loss and oxidation so the fresh produce lasts longer. By extending shelf-life, Apeel's solutions can reduce the degree to which perishability causes food loss and waste at various stages in the value chain - storage, distribution, retail and consumption - and often the products can reduce FLW at multiple stages within the same supply chain.	Thank you for providing this information to Verra.

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#	Organization	Comment	Developer's Response
2	Breakthrough Energy Ventures	Post-consumer food scraps used for animal feed	Thank you for providing this information to Verra.
3	Chilltech	Fruit, vegetables, meat and fish in transport ex farm and aggregation points to market or export point. Activities will take place across developing world, starting in West Africa. FLW is reduced by introduction of innovative free at the point of use cooling technology for refrigerated transportation and cold stores, thereby changing the economic incentives of players in the supply chain.	Thank you for providing this information to Verra.
4	Green Spot Technologies	GST activity is to collect fruits, veggies, legumes and cereals waste after first transformation and then turn them into higly nutritous stable powders for food industry by a fermentation technology. The supply is currently in short circuit in south of France (pilot stage around 60 000 T wet byproducts processed) and at commercial stage several units will be spread in France leading to the diversion of 300 000 T wet byproducts (between 60% and 80%) from the landfill.	Thank you for providing this information to Verra.
5	OLIO	Retailer level: FLW apps- food waste happens in retail locations, volunteers come collect food surplus and redistribute it. Food bank donations- food waste happens	Thank you for providing this information to Verra.

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#	Organization	Comment	Developer's Response
		in retail locations, volunteers or employees come collect food surplus and redistribute it. Residential & B2C level: FLW apps- Houesholds make household surplus food available for their local community to collect via a sharing app.	
6	Phenix	Our project is already active (https://www.wearephenix.com/en/)	Thank you for providing this information to Verra.
7	Robin Food	Training for households to prevent and reduce FW.	Thank you for providing this information to Verra.
8	South Pole	We were approached by project proponents looking at improved cooling systems to imporve the storage in the food supply chain or looking at improving the connection of food banks and transport facilities between them. Other possibilities could be the development of applications that allow individual people to save food from different restaurants and retailors.	Thank you for providing this information to Verra.
9	Toast Ale	We source surplus bread from bakeries and sandwich manufacturers that would otherwise be wasted and upcycle it into craft beer, replacing malted barley.	Thank you for providing this information to Verra.
10	Wageningen University	I would be most interested in FLW reducing interventions (which is different from the recovery options addressed in the	Thank you for providing this information to Verra.

Q1: For prospective project proponents, what types of food loss and waste (FLW) reduction activities would you be interested in including in a VCS project? Please describe where the activities take place and by what means FLW is reduced.			
#	Organization	Comment	Developer's Response
		document).	

Q2: Do you agree with the methodology's treatment of food as having both edible and inedible parts (i.e., no distinction required) or do you think inedible parts should be excluded for GHG emission reduction accounting?			
#	Organization	Comment	Developer's Response
11	Apeel Sciences	Yes, the methodology's treatment of food as having both edible and inedible parts (i.e., no distinction required) is appropriate to measure avoidance of GHG emissions in landfills.	Thank you for providing this input to Verra.
12	Breakthrough Energy Ventures	Inedible parts should be eligible for GHG emission reductions	As the methodology does not distinguish between edible and inedible, if these parts are diverted and ultimately consumed, they would be eligible.
13	Chilltech	Agree that is is unfeasible to distinguish.	Thank you for providing this input to Verra.
14	Green Spot Technologies	We do process currently inedible part that are pre-digested thanks to our fermentation platform (corn cob for example). The regulation is constantly moving in USA (GRAS status of food) and in EU (novel food status) opening the door tomorrow for parts that are inedible today.	Thank you for providing this input to Verra.
15	Matt Homewood Bidault	I think one has to be careful. Many people assume that inedible food waste makes up the vast bulk of food waste, yet we know	Thank you for providing this input to Verra.

Q2: Do you agree with the methodology's treatment of food as having both edible and inedible parts (i.e., no distinction required) or do you think inedible parts should be excluded for GHG emission reduction accounting?			
#	Organization	Comment	Developer's Response
		that there are tremendous amounts of edible foods being trashed along the entire commercial supply chain. This of course has significant impacts on food price and availability, and the state of the planet.	
16	OLIO	We think no distinction is required given the strong element of subjectivity regarding what is considered edible and inedible.	Agreed, thank you for providing this input to Verra.
17	Phenix	OK with the treatment of edible/inedible food	Thank you for providing this input to Verra.
18	Robin Food	Since inedible parts will be disposed of regardless, it would make sense to exclude them. That said, unavoidable food waste could be an negligible percentage of the whole food item, and may not we worth the effort of discounting.	See response for Comment #12.
19	South Pole	Applicability condition 4 states that "Due to the variability in what is considered 'inedible'...parts of food.". The variability should be resolved through an additional methodology requirement for project proponents to set up their own definition and use a material flow analysis (see Additional information / propositions in sheet "General Comments"). This approach can be informed through the approach used by WRAP's whole chain food waste reduction programmes.	As explained in the methodology, the definition of inedible or edible is highly contextual to the culture, geography and time in history of the subject performing the definition. Defining strictly what edible and inedible is could create a static, close and rigid view and could prevent innovative food recovery or FLW upgrading activities, or other approaches to "food". For example, consider the legal issues around new insect-based food products in EU and USA, which have been a common and traditional source of proteins and energy in the rest of the world.

Q2: Do you agree with the methodology's treatment of food as having both edible and inedible parts (i.e., no distinction required) or do you think inedible parts should be excluded for GHG emission reduction accounting?			
#	Organization	Comment	Developer's Response
		Additionally, the mentioned statements as it currently is in the methodology could cause negative unintended consequences, and / or confusion for food chain stakeholders. Most define waste in the inedible and edible parts within livestock, fish / seafood and fresh produce food chains. This is to inform where materials are directed to various customers, within manufacturing / processing facilities, and or to drive new innovations. Therefore, such definitions should be a required element of the project as it is a necessary and key part of data input and output.	
20	Toast Ale	Agreed.If the inedible parts are not used, e.g. a householder rescuing bananas who would throw away the skin, this should be captured by the leakage factor. If inedible parts are used e.g. banana skins are used by a food (or other - fabrics?) manufacturer, then this should be recognised.	Agreed. Part of the quantification of GHG ERRs includes leakage emissions from eventual discards.
21	Wageningen University	Yes	Thank you for providing this input to Verra.

Q3: Is the guidance provided on determining the mass of FLW avoided sufficient for prospective project proponents (Section 8, p. 15-16)?			
#	Organization	Comment	Developer's Response
22	Apeel Sciences	Not entirely. The methodology does not directly discuss scenarios where one project can include measurement of FLW avoidance at multiple stages in the value chain. For example, projects that focus on shelf-life extension may prevent FLW that would have been generated during distribution, retail, and consumption stages (and often all within the same value chain).	The methodology focuses on downstream emissions from the point of an intervention to divert food waste away from a FLW destination
23	Chilltech	Yes but it would be good if project proponents can select generic categories and emissions factors initially and then switch to more detailed calculations as capacity and resources improve.	The methodology offers an option to use default emission factors. Project proponents should use the best available data to calculate and report GHG reductions from the recovered food.
24	OLIO	Provided guidiance is sufficient.	Thank you for providing this input to Verra.
25	Phenix	Yes	Thank you for providing this input to Verra.
26	South Pole	The quantification is not fully evident, please refer to the comments in the General Comments sheet.	Thank you for providing this input to Verra. We have integrated your suggestions into the methodology document.
27	Toast Ale	Yes	Thank you for providing this input to Verra.
28	Wageningen University	No (chosen system boundaries seem inadequate, see detailed comments on next worksheet).	Thank you for providing this input to Verra.

Q4: Should we limit eligible FLW destinations to landfills without biogas capture and destruction?			
#	Organization	Comment	Developer's Response
29	Apeel Sciences	No, the eligible FLW desintations should be left as-is in the methodology. There is a greater opportunity to avoid additional emissions from shifting FLW to higher value purposes (human consumption) and the inclusion of project emissions and leakage rate are already included to avoid any shifts that do not result in net avoided GHG emissions. This methodology should incentivize ambitious projects that avoid as many of the emissions from FLW as possible, so the full set of FLW destinations should be included.	See response for Comment #31.
30	Carbon Market Watch	At a minimum, this should be properly taken into account in the leakage measurement. The current leakage provisions suggest that the project proponent should take this shift into account, but doesn't provide a clear methodology for doing so.	See response for Comment #31.
31	Chilltech	Double counting should be avoided, as the draft endeavours to do. I think you should keep the destinations as broad as possible (including informal baseline waste disposal methods such as are widespread in the developing world). If the additional emissions saved on top of biogas or flaring are minimal, the project will likely self-deselect.	The methodology includes other FLW destinations beside landfill without biogas capture. However, GHG benefits are expected to be minimal when diverting from destinations with valorization. Please note, that leakage associated with diverting food waste from these destinations with valorization will need to be accounted for.

Q4: Should we limit eligible FLW destinations to landfills without biogas capture and destruction?			
#	Organization	Comment	Developer's Response
32	Green Spot Technologies	Based on EPA food waste hierarchy, after preventing FLW, the best solution is to turn it back into food. That is the reason why : 1/ we think it is necessary to keep the methodoly that way in order to keep the FLW in the food circuit as much as it is possible and to be able to favour this valorisation.	See response for Comment #31.
33	Matt Homewood Bidault	I am getting lost in these questions. To keep it simple, the well-established food waste hierarchy, IMO, should be well respected. "Green" activities like incineration and AD should not be encouraged. In his book, "Waste" Tristram Stuart quotes academic studies where researchers find that AD, for example, only recovers 0.75% of the total energy that was used to grow and market a tonne of tomatoes in the first place. There should be zero edible FLW going anywhere near many of those destinations.	See response for Comment #31.
34	OLIO	You should not limit the eligible FLW to landfills without biogas because human consumption is an outcome superior to any waste treatment.	See response for Comment #31.
35	Phenix	Due to the lack of data related to each FLW destination for each category and producer of FLW, we recommend to use an average based on both "classical" landfills and those with biogas capture and	See response for Comment #31.

Q4: Should we limit eligible FLW destinations to landfills without biogas capture and destruction?			
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		destruction.	
36	South Pole	Currently, the methodology is contradictory on this (see General Comments sheet). Limiting possible projects to activities with a baseline without biogas capture and destruction potentially limits the applicability of the methodology, as many developed / industrialised countries apply biogas capture. Please see the General Comments on these.	See response for Comment #31.
37	Toast Ale	No, the approach is aligned with the food waste hierarchy - a reduced saving by diverting from non-landfill but still a positive impact.	See response for Comment #31.
38	Wageningen University	No. In Europe biogas capture from landfillls is very common.	See response for Comment #31.

Q5: Are there other baseline FLW destinations that are relevant for generating GHG emission reductions? If yes, can you describe these FLW destinations and what characteristics they should have to guarantee GHG emission reductions from diverting FLW?			
#	Organization	Comment	Developer's Response
39	Apeel Sciences	The commentor is not aware of any other FLW destinations that would be relevant for the project areas under consideration.	Thank you for providing this input to Verra.

Q5: Are there other baseline FLW destinations that are relevant for generating GHG emission reductions? If yes, can you describe these FLW destinations and what characteristics they should have to guarantee GHG emission reductions from diverting FLW?			
#	Organization	Comment	Developer's Response
40	Chilltech	FLW avoidance is not a destination as such but I think this is captured in the draft. Avoided GHG emissions from reduced tonne-miles of transport due to reduced spoilage of food thanks to introduction of refrigerated transportation is a justifiable in my opinion and easy to quantify, taking the baseline FLW coefficient per category of produce, standard fuel consumption per tonne/mile transported and CO2e content per unit of fuel saved.	Thank you for providing this input to Verra.
41	Green Spot Technologies	The flows between the different destinations are not so clear and so easy to really justify. Most of the time, it is partially used as feed and available for the farmers when they want to come and if they don't want/need/can, it is going to landfills (for spent grains for example). There is a huge variability that makes feed as an uncertain way of valorising FLW. Furthermore, in the methodology the CO2 emitted by the use/eat of ingredients is included, again in the case of spent grains if we compare CO2 emissions cradle to grave food VS feed, food seems to be more advantageous (because of animal methane emissions). That is the reason why we believe that diversion from feed could be included.	See response for Comment #44.
42	OLIO	No suggestions	

Q5: Are there other baseline FLW destinations that are relevant for generating GHG emission reductions? If yes, can you describe these FLW destinations and what characteristics they should have to guarantee GHG emission reductions from diverting FLW?			
#	Organization	Comment	Developer's Response
43	Toast Ale	All seem to be covered	Thank you for providing this input to Verra.
44	Wageningen University	Yes: animal feed. Adequate analysis may be quite challenging, but some estimate of feeding nutritional value may be derived from DM content and protein content. This is far from trivial, but I would recommend to add this option in the future.	Diversion to animal feed as a form of intervention is included in the methodology, so long as the animals remain in the human consumption chain. Diversion AWAY from animal feed as an FLW destination in the baseline is not permitted. Please note, that leakage associated with diverting food waste from destinations with valorization will need to be accounted for.

Q6: What would be an appropriate (and resource-efficient) way to assess the uncertainty of FLW measurements?			
#	Organization	Comment	Developer's Response
45	Apeel Sciences	Sensitivity and/or scenario analysis can be a useful tool to understand the uncertainty and how likely the results are to change drammatically under expected conditions. This would involve identifying which assumptions or parameters the results are the most sensitive to and then running an analysis varying that parameter or set of parameters based on the expected range of possibilities.	The methodology requires that project proponents account for and report on the amount of FLW in line with the requirements of the FLW Standard, which includes guidance on uncertainty.
46	Carbon Market Watch	The methodology generally lacks an assessment of uncertainty, e.g. in the default factors proposed. This is	The methodology requires that project proponents account for and report on the amount of FLW in line with the requirements of the FLW Standard, which includes

Q6: What would be an appropriate (and resource-efficient) way to assess the uncertainty of FLW measurements?			
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		problematic as some are based on estimates covering large geographies (like the entire US) and could be used globally. There should not be any quantification without some uncertainty assessment.	guidance on uncertainty.
47	Chilltech	As projects mature and resources improve, greater granularity can be achieved by project developers. Meanwhile, the methodology rightly errs on the side of caution and conservative calculation. Supra-national bodies' statistics, academic studies and government statistics can be used initially.	Thank you for providing this input to Verra.
48	Matt Homewood Bidault	Unfortunately, I can only see legislation solving this systemic issue of FLW measurements uncertainty.	Thank you for providing this input to Verra.
49	OLIO	No suggestions	Thank you for providing this input to Verra.
50	Wageningen University	In case of high variability of FLW, expert estimates could be more relevant than a small set of direct measurements. see e.g. https://sites.google.com/iastate.edu/phlfwreduction/home/efficient-food-loss-waste-protocol	The methodology requires that project proponents account for and report on the amount of FLW in line with the requirements of the FLW Standard, which includes guidance on uncertainty.

SPECIFIC COMMENTS

Section 1 - Sources

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#	Organization	Comment	Developer's Response
51	South Pole	WRAP runs various whole chain food waste reduction projects with retailers / customers, suppliers and growers; and shared case studies on these on their website. Connecting with WRAP's specific team here could provide insight into: how they used current methodologies and protocols to build these programmes; how to build a methodology for commercial contexts; how to leverage historical financial and supplier data for food waste/ loss measurements; how to map out material flows; how to co-define specific supply chain definitions on food waste and loss which connect to the FLW Protocol; and how to set governance processes around monitoring.	Thank you for your feedback. Verra worked closely with WRAP to develop this methodology.

Section 2 – Summary Description of the Methodology

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#	Organization	Comment	Developer's Response
52	Chilltech	Missing stages of the food chain	The current version of the methodology covers the

Section 2 – Summary Description of the Methodology			
#	Organization	Comment	Developer's Response
			downstream stages following an intervention to divert food away from an FLW destination.
53	South Pole	The methodology states "This methodology is applicable in situations where the baseline scenario for the FLW destination has no valorization such as use as soil amendments or energy recovery." This statement is contradictory to the rest of the methodology (see Section 5 and 8.3).	Thank you for this feedback. It has been incorporated into the methodology.
54	South Pole	First sentence - "The methodology applies to project activities ….the human food chain". Limiting the project scope to human food chain excludes how a food value chain may serve multiple purposes i.e. growing wheat and soy bean for human and animal feed purposes. And therefore, how these projects focusing on keeping food in the human value chain could cause unintended consequences (see Additional information / propositions below).	Thanks for the suggestion. MFA is indeed a powerful tool that could help project proponents to track or indirectly calculate FLW flows within their project boundaries. The methodology includes information on MFA as a possible tool that a project can use to elaborate and report collected FLW data.
55	Toast Ale	"This methodology is applicable in situations where the baseline scenario for the FLW destination has no valorization such as use as soil amendments or energy recovery." Many waste disposal companies including council kerbside collections, are now using AD/ EfW facilities - there is some valorisation so higher in the waste hierarchy than landfill, but lower than	Thank you for providing this input to Verra.

Section 2 – Summary Description of the Methodology			
#	Organization	Comment	Developer's Response
		keeping food in the human chain. This seems to be allowed for in the methodology, eg section 6, but reads as contradictory here.	
56	University of Minnesota	The objective of the proposed methodology is too narrow in scope by only considering net GHG reductions from keeping food (edible/inedible) in the human food chain. Recycling and upcycling food loss and waste sources into animal feeds has been ignored in the current definition and methodology and must not excluded from consideration because they can contribute to reductions in GHG emissions in food animal production when included in animal diets. There are numerous examples of inedible agri-industrial by-products (e.g., bakery by-product meal, meat and bone meal, wheat middlings) that have been recycled into animal feeds for many decades, and contine to be, and they represent various types of food losses and waste from all types of food supply chains. In fact, the third highest priority in U.S. EPA food waste and loss hierarchy is to recycle food loss and waste into animal feed. Therefore, a revised definition is needed in the this VCS methodology framework.	See responses in Comment #127 and #59.
57	University of Minnesota	In addition to the previous comment, a designation between pre-consumer and post-consumer food loss and waste is needed. Post-consumer food scraps	See responses in Comment #127 and #59.

Section 2 – Summary Description of the Methodology			
#	Organization	Comment	Developer's Response
		represent significant nutrient sources that no longer have value in the human food chain, but they have signficant nutritional value if thermally processed and used in animal feeds. The net effect of doing this is three-fold: 1) avoidance of GHG emissions from landfills or lesser value disposal methods, 2) achieving greater nutrient recovery (nitrogen and phosphorus) by upcycling post-consumer food scraps into animal feed, and 3) reduction in GHG emissions attributed to animal feed by partially replacing common ingredients such as corn and soybean meal that have a much greater GHG and envirmental footprint in animal agriculture than food loss and waste sources.	
58	Wageningen University	Situations where the FLW has no energy or soil amendments function are very rare… This limitation minimizes applicability or results in fundamentally wrong outcomes	See responses in Comment #127 and #59.

Section 3 – Definitions

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#	Organization	Comment	Developer's Response
59	South Pole	There is inconsistency into the rationale presented as to why pet food / animal feed	Diverting FLW for animal feed falls within the scope of the methodology, provided that project proponents can

Section 3 – Definitions			
#	Organization	Comment	Developer's Response
		and food chains are excluded from the project. Examples: On page 7, footnote 3 in the methodology explains that FLW excludes animal feed Annex 1 of the methodology includes animal feed as one of the possible FLW destinations. Annex 1 makes it clear that crops specifically grown for animal feed are not included.	prove that the animals are in the human food chain and will be used for human consumption.
60	South Pole	Overall, the project definitions could be expanded to inform the reliability of the project methodology and outcomes. E.g. food waste and food loss should be defined separately; there isn't a definition for prevention of food waste and food loss; there is no equivalent definition for recovering food from waste and loss; or a definition for circular food systems and principles for food waste. Currently the definitions don't account for the complexity of the food value chain, drivers / causes of food waste and loss, and the variation in food / waste / loss definitions across food types. Furthermore, the terms for "preventing" or "recovering" food waste for the human value chain is confusing and limits the methodology to projects with a linear economy focus - i.e. not circular economy innovations looking to 'upcycle' or 'reuse' resources.	The definition section has been updated.

Section 3 – Definitions			
#	Organization	Comment	Developer's Response
61	Toast Ale	Perhaps not needed, but can it be made clear that food includes food and drink	Thank you for providing this input to Verra.

Section 4 – Applicability Conditions

Section 4 – Applicability Conditions			
#	Organization	Comment	Developer's Response
62	Chilltech	Missing stages of the food chain	Please see non-exhaustive list of example project activities in the Applicability Conditions.
63	Chilltech	Would FAO/WORLD BANK/LOCAL AGRI MINISTRY stats/studies be acceptable?	Data drawn from the FAO or national stats may be used for the baseline emissions (if more relevant or accurate than the default factors provided). General statistics cannot be used to calculate project emissions.
64	Chilltech	Is a project achieving prevention of spoilage without any diversion subject to leakage?	Leakage should be addressed by all project types. Please refer to section 8.3 for guidance.
65	South Pole	The methodology does not explicitly state any requirements in relation to the adherence to national (or others) health and safety standards governing food production and consumption.	Thank you for the suggestion. This has been added to the applicability conditions.
66	South Pole	Evidence has to be presented that, in absence of the project, food would have been discarded and not consumed by	The methodology requires the provision of credible evidence such as contractual agreements, receipts of sale of food, and waste management records to show

Section 4 – Applicability Conditions			
#	Organization	Comment	Developer's Response
		humans.	that food was retained for sale (or use) and not sent to any FLW destination.
67	South Pole	The applicability condition 2 states the alignment with the US EPA's Food Recovery Hierarchy and the UN's SDG 12.3. These are indeed key references to use. However, the linear economy framework limits this methodology to focus on projects which prevent and recover food waste - rather than including circularity definitions or economy flows for materials. On the other hand, Annex 1 of the methodology has various definitions which also include circularity definitions - this confuses project users as to what approach is accepted within this project scope; linear economy models or circular economy models or both.	Thank you for providing this input to Verra.
68	South Pole	Transport distances have to be included in baseline and project emission calculations where possible.	The methodology provides procedures to include emissions from transport in the baseline and project scenarios.
69	South Pole	The methodology says "Credible evidence for the amount of recovered food and the actual use of the recovered food can be provided […].".	Thank you for providing this input to Verra.
70	South Pole	The methodology states that "Credible evidence such as contractual agreements, receipts of sale of food, and waste	The methodology includes examples of evidence types to show the food was consumed in the project scenario.

Section 4 – Applicability Conditions			
#	Organization	Comment	Developer's Response
		management records can be provided to show that the food was retained for sale (or use) and not sent to any FLW destination.".	
71	South Pole	"Credible evidence such as contractual agreements…was previously sent to FLW destinations used for the baseline scenario."	The methodology includes contractual agreements as one of the forms of credible evidence to demonstrate where food was sent in the baseline scenario.
72	Toast Ale	Should this include the transport emissions, not just the distance - e.g. an EV or filling a backhaul lorry is lower in impact than a diesel van. Section 5b is more explicit about this, but 4.4 only mentions distance.	Transport emissions have been included.
73	Toast Ale	Should the considerations explicitly exclude packaging from the mass of FLW? Does there need to be a consideration for what happens to the packaging v the baseline scenario or explicitly disregard this?	Packaging is included in the project emissions section in the equation to quantify OE ("other emissions", covering any additional materials consumed in the project scenario).

Section 5 – Project Boundary

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#	Organization	Comment	Developer's Response
74	Chilltech	Can we envisage regional spatial boundaries such as ECOWAS/CARIBBEAN, where practices are broadly similar?	Per the VCS Program, a project proponent can group project instances, whereby a single project has one or more clearly defined geographic areas where project activity instances are developed (see *VCS Standard v4.3*, Section 3.5.8-3.5.13). Thus, it could be possible to have a project with multiple instances across a region, so long as the grouped project requirements as defined by the Standard are met.
75	Chilltech	I understand the exclusion of upstream production related GHG emissions. However, in the case of reduced spoilage in transportation, could one seek to include the fuel savings from reduced tonne-miles of transportation?	Inclusion of fuel savings from reduced transportation is out of the scope of the methodology. However, other methodologies that cover this project activity could potentially be stacked with the food loss and waste methodology. Please refer to *VCS Standard, v4.3* Section 3.5.1-3.5.3 for more information on using more than one methodology.
76	South Pole	The current methodology suggests to include transport emissions in the baseline and project scenario if possible. It is unclear what the priority on this is and how project proponents should proceed if not enough data is available and/or if data is available only for one scenario (baseline or project).	The methodology provides procedures to include emissions from transport in the baseline and project scenarios. Transport emissions may be conservatively excluded in the baseline scenario but must be included in the project scenario.
77	South Pole	Although Figure 1 and Figure 2 provide guidance behind the key stages of a food chain and thus emissions sources, they also miss key areas of where emissions are released and reduced / removed, e.g. in	At this time, the methodology covers the downstream emissions from diverting food away from an FLW desination.

Section 5 – Project Boundary			
#	Organization	Comment	Developer's Response
		the food production / growing and processing stage before distribution. And the various FLW destinations and end of life scenarios which occur across the chain - and thus release emissions in various other areas of the food chain i.e. on farm, in distribution, in retail shops or food service catering facilities, in online delivery distribution hubs and transport, and in consumer households / places of work	
78	Toast Ale	The Note states that only downstream emission avoidance is included because of the challenges measuring supply chain emissions avoided. This is not the case for companies that are using the FLW to replace another measurable 'virgin' ingredient in the circular economy. In the example of my company, we brew with surplus bakery bread, replacing 25% of malted barley. We know the GHG impact of malt and therefore the direct reduction by reducing malt (in addition to the downstream emissions avoided by preventing bread from being discarded).	See response in Comment #127.
79	Wageningen University	Current description only describes the option of recovery of (in the base line lost or wasted) food. This is only a small subset of the potential interventions listed in Appendix 2. For instance manufacturing line optimization (which may for instance include introduction of refrigerated storage). Such intervention would affect	Only additional GHG emissions that are incurred by the project to recover the food, with respect to the baseline, need to be included. In the example you make, these emissions from higher energy use would be included in the calculation of project emissions from processing.

Section 5 – Project Boundary			
#	Organization	Comment	Developer's Response
		energy use.	
80	Wageningen University	Excluding GHG emissions related to food production is a dramatic decision, which in our opinion undermines the link between FLW reduction and climate action. Actually food climate impact is largely dominated by emissions in the production phase (except for product that are transported over large distances and/or by air). The major benefit of FLW reduction is the indirect effect of lowering demand for agricultural crops...	See responses in Comment #127 and #59.

Section 7 – Additionality

Section 7 – Additionality			
#	Organization	Comment	Developer's Response
81	Chilltech	What is the position where there are regulations on paper, which are totally ignored in practice?	Under the VCS Program, any project activity must demonstrate regulatory surplus, i.e., the project shall not be mandated by any law, statute or other regulatory framework, or for UNFCCC non-Annex I countries, any systematically enforced law, statute or other regulatory framework. Even if loosely enforced, should a mandate exist in a specific geography, a project would be ineligible in this area.
82	South Pole	Step 2 to identify barriers to project implementation. Barriers are currently	Thank you for the feedback. Supply chain issues may be provided as a potential barrier to project

Section 7 – Additionality			
#	Organization	Comment	Developer's Response
		defined as "(e.g., investment, institutionals, cultural and social barriers.)"	implementation.
83	Carbon Market Watch	Barriers (in step 2) are described as preventing PPs from carrying out the proposed project activity. This is not enough to demonstrate additionality. Some barriers could prevent a specific activity, but there could be other activities that lead to the same impact and which are not prevented by the barrier.	The identification of barriers preventing implementation must be connected to a specific activity, i.e., the project activity being considered by the project proponent. While a variety of activities *could* have impacts on food waste, this would not be a relevant consideration.
84	Carbon Market Watch	Both criteria for "investment analysis" are inadequate. For the first one, it is not because similar activities have only been implemented with grants in teh past, that there is necessarily a barrier today. Economic conditions change. Past profitability is informative, but not a barrier in itself. For the second one, it is not sufficient to look only at a cost comparison. An investment analysis tipicaly requires to look at the change in return on investment, which compares the cost/benefit ratio of both activities. Maybe discarding food has a lower cost than keeping it in the human supply chain, but keeping it in the chain also has a higher benefit, which means that the overall investment benefit is higher for keeping it inside the human supply chain. This is relevant here, because food waste represents a significant financial loss, and hence there	The first criteria, that similar activities have only been implemented with grants or non-commercial finance, is an investment barrier utilized by the CDM in their well-established additionality tool. Without a commercial finance stream, activity implementation will be limited. The second criteria, that there is a lower cost to discard food, is context-dependent. For example, the discarded food could be by-products from processing; efforts to re-purpose this food would likely have a significant upfront cost, meaning it would be cheaper to discard the excess food. Please note that this is a non-exhaustive list of criteria. Ultimately, the VVB assessing a project will determine whether the barriers and supporting evidence are a sufficient demonstration of additionality.

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		is a clear economic benefit in reducing it.	
85	Carbon Market Watch	The strength of the barriers can vary a lot, especially the ones in the institutional barriers section. Demonstrating the existence of one of these does not make the project additional. E.g. there could be a lack of skilled workers trained on the issue of FLW, but high awareness among consumers which means there is low FLW. The barriers here are too general and would make it easy to show additionality.	For a barrier to be sufficient grounds for demonstrating additionality, there must be credible evidence provided that shows the barrier specifically prevented the project activity from being implemented. A common practice analysis then accompanies this barrier analysis; both of these steps must be met for an activity to be additional. With the example you provide, if there was a low amount of FLW due to high awareness among consumers, then there would be no incentive to generate a carbon project to reduce FLW using the VCS methodology.
86	Carbon Market Watch	Being "first of its kind" does not make an activity additional. It is not a barrier.	As defined by the CDM, a "first-of-its-kind" activity is considered additional so long as it meets the following critera: "The project is the first in the applicable geographical area that applies a technology that is different from technologies that are implemented by any other project, which are able to deliver the same output and have started commercial operation in the applicable geographical area before the project design document is published for stakeholder consultation or before the start date of the proposed project activity." While identifying other technologies, project proponents should use publically available information, for example, from governments, industry associations, & other sources on the market penetration of these other technologies.
87	Carbon Market Watch	In step 3, it is not appropriate to use "reports by industry associations" to demonstrate that the adoption of the	An industry association is defined as an organization that supports companies and employers of a particular type of industry. The use of industry association reports is

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		activity is not common practice. How are "industry ssociations" defined? Could this be an association to which the activity proponent is a member? This is not peer reviewed. This is not credible litterature to base an additionality assessment on.	permitted in several VCS methodologies, particularly when considering activities that have limited sources of credible evidence that can support claims. Please keep in mind that any report provided as evidence would be verified by the VVB assessing the project.
88	Carbon Market Watch	The following rule is inappropriate: "A project proponent may include project instances where more than one activity to keep food from leaving the human supply chain will be implemented at the same location8. When evidence on adoption rates for the combined activities does not exist, the project proponent may multiply the adoption rates of the individual activities to estimate the combined, or "stacked", activity adoption rate." That can lead to common practice activities being passed as innovative. One could have an activity that has a 30% adoption rate, and one that has a 50% adoption rate (hence both are considered common practice because above the 20% threshold), and the combination would give a rate of 15%. Eventhough both activities are common practice, their combination would be deemed innovative. This is not a good way of plugging the absence of data.	The methodology has been updated to remove the weighted average approach. Rather, each individual activity must undergo its own common practice analysis.

Section 8 – Quantification of GHG Emission Reductions and Removals

Section 8 – Quantification of GHG Emission Reductions and Removals			
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89	Apeel Sciences	There are interventions that can reduce FLW at multiple stages in the value chain with one set of project activities (e.g., better supply-demand planning, shelf-life extension). The methodology as written would not capture FLW at multiple stages within one project.	Thank you for providing this input to Verra. Please note that only those GHG emission savings that can be backed by sufficient evidence can be used in the calculation.
90	Toast Ale	"Project proponents should use country-specific emission factors where and if available." Will the methodology link to sources that are available and require them to be used, and the latest available e.g. Defra in the UK updated annually	The methodology does not provide specific emission factors by country, rather it provides guidance on appropriate sources for projects.
91	Wageningen University	Limiting the scope of FLW to only direct GHG emissions in FLW processing is considered inadequate for composting. When applied in soil, carbon in compost is fixed in the soil for many years, with significant negative climate impact factor. I am aware that this seems to make FLW reduction for streams that are currently composted unattractive, but this potential benefit would become small if emissions in agricultural production were taken in consideration.	Leakage emissions associated with this destination must be included.
92	Wageningen University	Anaerobic digestion results in energy and digestate. Both effects are not reflected in the emission factors. Consequently I also	These effects are covered by the leakage emissions calculations.

Section 8 – Quantification of GHG Emission Reductions and Removals			
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		expect differences between streams with different DM content.	
93	South Pole	Section 8.1: The footnote d for Anaerobic digestion in Table 3 is unclear.	Thank you for providing this input to Verra.
94	South Pole	Section 8.1: Option 1 - The parameter EFi,y in equation (1) includes the related collection/transportation emission factor. Option 2 - Equations (3) and (4) include the transport emission from the baseline scenario. As mentioned in S. No. 14, it is unclear how and when transport emissions have to be considered in the baseline scenario.	The equations have been updated. Transport emissions may be conservatively excluded in the baseline scenario but must be included in the project emission calculation.
95	Carbon Market Watch	Section 8.1: In option 1, the use of the same default factors at a global level carries a high level of uncertainty. This calculation cannot be approved without an uncertainty assessment. If no uncertainty measurement is possible, then this methodology is not sufficiently robust.	The emission factors are globally representative since they are technology-based —rather than geography-dependent. Project proponents should use country-specific emission factors where and if available.
96	Carbon Market Watch	Section 8.1: The exclusion of "avoided emissions from co-product offsets" under the baseline is problematic, especially given the lack of clarity in how this is treated in the leakage section. If food waste is used to generate electricity, there are some avoided emissions that must be included in the baseline. Taking food away from the facility will lower electricty	The leakage section has been updated to address this.

Section 8 – Quantification of GHG Emission Reductions and Removals			
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		production. This seems to be addressed in the leakage section, but the methodology for calculating this is unclear. It would be more straightforward to include this in the baseline. The same applies to other cases, e.g. food waste used as fertiliser, which reduces the use of other types of fertilizers.	
97	Farmlink Project	Section 8.1: Equation 3, proposed for calculating baseline methane emissions, is based on a simplified version of a more thorough and specific equation in the same CDM tool (Emissions from Solid Waste Disposal Site, Version 08.0) that allows for the inclusion of site-specific waste streams and incorporates a methane generation (decay) rate constant (kj). By only allowing for the use of the simplified version of this tool in Option 2 for Baseline Emissions calculations, the proposed methodology not only precludes the use of more detailed, site-specific food waste stream data, it may also result in differential incentives for food loss and waste activities based on the use of global defaults instead of project-specific information.	Project proponents may use the referenced CDM tool to account for these emissions in a more precise manner (site-specific) if they have access to the data necessary to apply the formula.
98	Farmlink Project	Section 8.1: Equation 3 includes a duration of 20 years for calculating methane emissions resulting from the landfilling of waste in a single year. This duration is not specified in Equation 15 of the referenced	The 20 year period selection refers to the Table 2 in same Appendix of the cited CDM tool. The default factors provided in the simplified approach go up to 20 years.

Section 8 – Quantification of GHG Emission Reductions and Removals			
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		CDM tool (Emissions from Solid Waste Disposal Site, Version 08.0)	
99	Apeel Sciences	Section 8.2: The current scope in the methodology and associated equations to calculate the Project Emissions only apply to interventions that occur at the same node in the supply chain where the FLW would have been occurring and are therefore focused on interventions that divert FLW to a new destination once it is already likely to become waste ("recover food" is the term used in the text). With changes just to section 8.2, this methodology could be applicable to a much broader set of projects that are reducing GHG emissions by avoiding FLW.	Project emissions cover all new emission sources due to the introduction of the project activity.
100	South Pole	Section 8.2: Equation (5) includes the transport emissions from the project scenario. The description of the parameter PETrans_y is not clear on when these have to be included (see also S. No. 14), what data availability is needed and what happens when not enough data is available to calculate the parameter with Equation (6). Additionally, the case of individual transportation needs to be covered, e.g., people go pick up safed meals individually with different means of transportation, which can be car, public transportation, bike, etc.	See response in Comment #94.

Section 8 – Quantification of GHG Emission Reductions and Removals			
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101	South Pole	Section 8.2: Equation (7) includes the parameter OEy which includes other emissions from the consumption of additional material needed for the processing and delivering the new food product. It does not seem clear what has to be included under this parameter and when such additional emissions can be seen as de minimis.	A cut-off criterion is included to guide projects when to include/exclude such materials or additional ingredients (see Section 8.2). In general, emissions from packaging materials must be included.
102	Toast Ale	Section 8.2: Project emissions to only include transportation and further processing of the food. Should it also include emissions from additional packaging e.g. aluminium cans, perhaps apportioned when the FLW is only a % of the ingredients, or is this explictly excluded (e.g. the beer would have been canned anyway, the benefit is the replacement of malt with bread)? Same question for including a proportion of other operational emissions of the entity e.g. electricity use to run a website/app. I think transport has been included in particular because it's included in the baseline emissions, so just a question for understanding!	See response in Comment #73.
103	Carbon Market Watch	Section 8.2: There is a major ommission in the calculation of project emissions, in that it assumes that the consumption of food within the human supply chain leads to no emissions. Food only seems to generate	These emissions will also occur in the baseline, as all FLW will be eventually respired and converted into biogenic CO2 sooner or later. We have covered this in the following statement in section 5: "Activities excluded from the project boundary are those that would continue

Section 8 – Quantification of GHG Emission Reductions and Removals			
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		emissions when it is "waste", but not when it is consumed. This is not accurate. The methodology itself states in sectino 8.1 that "Around 50% of the mass of the DM in food is carbon, which when digested, burned, or in some way respired or transformed, is released to the atmosphere in the form of (biogenic) carbon dioxide or methane.". Note the word "digested" here. When humans consume the food, this generates emissions. Ignoring these will lead to under-estimation of project emissions, and hence over-crediting. There could also be other types of emissions to be considered at this stage, such as those resulting from cooking food before it can be consumed.	to occur as part of typical food storage, handling, cooking and consumption, such as refrigeration or freezing, cooking, digestion of food and treatment of human excreta, and discarding food (which is already covered by the leakage factor)."
104	South Pole	Section 8.3: Leakage has to be considered for the eventual discard of the saved food (calculated with equation (8) and data from Tables 4 and 5) for the potential deviation of food waste from a FLW destination with valorization (e.g. biogas plant). The methodology is not fully clear on how the two potential sources of leakage have to be combined and calculated together. Additionally, the methodology makes contradictory statements in relation to the inclusion of food waste with final valorization.	Leakage emissions have been further defined.
105	Toast Ale	Section 8.3: Question - is there a consideration of value in the calculation of	No, the leakage factor are product category specific and linked to the food supply stage. If more accurate data

Section 8 – Quantification of GHG Emission Reductions and Removals			
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		leakage i.e. a higher priced product is less likely to be wasted (e.g. sliced white bread v craft beer)	exists, project proponents should use that instead
106	Carbon Market Watch	Section 8.3: The section on leakage requires this: "Project proponents must include the GHG implications of removing food from the FLW destinations and account for these as an additional leakage factor.". But there is no explanation on how this should be done, only an example (of food diverted from a facility that relied on it to generate energy). The methodology also does not list more examples of cases where this leakage should be taken into account (e.g. when food waste is used as a fertilizer). There is also no explanation about how this effect should be combined with the default factors in tables 4 and 5 to provide an overall leakage factor, as used in equation 8. The methodoloy is incomplete in this regard, and should not be used as such.	The leakage section has been updated to address this.

Section 9 – Monitoring

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107	South Pole	Section 9.2: The parameter "Mass of the recovered food" is measured in tonnes. According to the methodology, data should be submitted as tonnes in wet matter. We suggest that it doesn't matter if it is dry or wet matter as based on the wide variety of foodstuffs both are possible.	Thank you for providing this input to Verra.
108	South Pole	Section 9.2: The monitoring frequency for this parameter is split in Application A and B. The methodology does not refer to such applications.	Thank you for providing this input to Verra.
109	South Pole	Section 9.3: The methodology lists the information that needs to be included in the monitoring plan. Bullet point six of the provided list (10-year baseline re-evaluation plan) is in our view not applicable for this methodology.	Thank you for providing this input to Verra.

General Feedback

General Feedback			
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110	Breakthrough Energy Ventures	Breakthrough Energy Ventures is a leading climate technology investment company	See response in Comment #59.

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		looking to reduce GHG emissions across all sectors of the economy including a robust portfolio of food and agriculture innovation companies. We feel strongly that the preservation of food nutrition plays an important role in reducing global GHGs and support VERRA's work in further defining the classification of different sources in these sectors. This comment pertains specifically to the definition of Food Loss and Waste (FLW) used by the draft methodology. As per Champions UN SDG Target 12.3 2016 Progress Report (referenced by the draft methodology), any food materials used for animal feed are considered to be a form of FLW, "diverting material from the food supply chain" [1].	
111	Breakthrough Energy Ventures	We strongly support the inclusion of upstream emissions	See responses in Comment #127 and #59.
112	Carbon Market Watch	The methodology is currently incomplete in that it will likely underestimate project emissions, and carries significant uncertainty without quantifying it. The way it is currently framed does not make it clear that only projects with net positive climate impacts will get credits, and that no over-crediting will take place.	The quantification section of the methodology is aligned with the Principle of Conservativeness, taking into account any new sources of emissions under the project scenario.
113	FareShare		

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114	GCF	The report indicates that the methodology applies to project activities that "reduce the amount of food that would otherwise have been discarded, therefore leaving the human food chain…" it was not clear to me if the food that used to go to the landfill and now diverted for animal/insect feed is considered within the scope that it remains in the human food chain and thus can be considered for carbon credits.	Animal feed does fall within the scope of the methodology, so long as evidence can be provided that the animals ultimately remain within the human consumption chain.
115	GCF	On the same topic, from my reading the food that is redirected for industrial purposes where it is manufactured as food product qualifies for carbon credits, however, food that is diverted from going to landfills to non-food industrial development or for composting is not considered for carbon credits. I find this strange as if the project focuses on diverting food going to landfill for industrial processing or composting (both of which have lower GHG as is evident from Table 3 by a simple comparison of emission I landfill versus composting). This can encourage the big generators of food waste that cannot be rescued (e.g. hospitality industry consumer waste) to make extra effort to divert it for composting which is lower carbon footprint. Is there any opportunity to pass this to the developers of the methodology (at least to consider calculation that difference between landfill and composting as in table	The avoidance of such emissions is outside the scope of this methodology (see the applicability conditions for a non-exhaustive list of project activities covered by the methodology). Please, refer to Verra's waste methodologies for that purpose, e.g. VM0018 (https://verra.org/methodology/vm0018-energy-efficiency-and-solid-waste-diversion-activities-within-a-sustainable-community-v1-0/)

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		3?	
116	Green Spot Technologies	Water consumption is not considered to assess the impact of the new process to divert the FLW	GHG emissions from additional water use are expected to be negligible. However, these are covered in the project emissions: "Project emissions from electricity consumption or other energy and/or material use for additional processing, storage, etc. in year y (tCO2e), if considered additional for the recovery of food"
117	Green Spot Technologies	Unclear who can apply/benefit from the carbon credit	Verra is agnostic about the project proponent, so long as the requirements set out in Section 3.6 of the *VCS Standard, v4.4* are met. As defined by the VCS, a project proponent is the "individual or organization that has overall control and responsibility for the project, or an individual or organization that together with others, each of which is a project proponent, has overall control or responsibility for the project."
118	Green Spot Technologies	One major point when it comes to upcylcing is not mentionned : resources optimisation	Thank you for providing this input to Verra.
119	OLIO	Inclusion of upstream emissions	See response in Comment #127 for more info.
120	Phenix	Broadening of the methodology: today, the activities of many companies actively working to reduce food waste are focused on waste avoidance, with a significant and quantified impact on food waste in the retail sector. One could challenge the choice to focus only on the downstream part of these activities, neglecting the upstream part: by consuming a certain quantity of food products rather than	See response in Comment #127.

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		throwing them away, one avoids buying a certain part of it, thus avoiding contributing to the emissions associated to the production of another product. "Note: A significant amount of GHG emissions is embodied in the production of food. Using and consuming a higher proportion of available food would therefore, in aggregate, generate reductions in production-related GHG emissions. However, since GHG emissions associated with food supply chain emissions are difficult to prove as having taken place, this current methodology version only covers downstream emissions."	
121	Phenix	Difference between US and EU regulations: In the EU, the biowaste regulation obliges professionals to turn to recycling channels for this waste, and therefore avoids landfills and incineration, which serve as the baseline scenario for this study. Innovative European approaches would therefore be penalized compared to approaches in countries where legislation is less advanced on the issue.	The scope of the methodology is limited to activities that keep food within the human food chain. Project proponents may include destinations other than landfill, but the GHG emission reductions might be limited.
122	Robin Food	Robin Food NGO and others around the world are working on helping households reduce food waste, involving multiple stakeholders. These projects have potential to reduce FLW carbon emissions	Thank you for this feedback. Reducing FLW at the household level is simultaneously extremely challenging but much needed. In the U.S., studies show that the average household wastes about 32% of food

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		significantly, especially in developed countries. Creating a VCS framework for FLW prevention would help make these projects feasible and create signficant income for initiatives like ours, which could help scale our operations and impact.	purchased.
123	Robin Food	In order to create a holistic framework to encompass such impact - it is important to include upstream emissions to the equation (such as emissions from growing the food), otherwise approximately 70% of the carbon impact of our work will not be accounted for.	See response in Comment #127 for more info.
124	South Pole	Additional information / propositions - Examples of unintended impacts	Additional examples of unintended impacts have been added.
125	South Pole	Additional information / propositions - Example for possible definitions: Key terms of reference and definitions needed to achieve the following:	
126	Southampton	How does the methodology deal with ITMO compliance? Would it be contractual at project level rather than part of the methodology? Which CC's on the VCS register would be ITMO compliant?	The methodology does not address ITMO compliance; rather, this is covered at the Program level.
127	Throw No More	A new form of revenue through the form of carbon credits would be of significant help to small food waste reduction businesses like Throw No More.	Thank you for providing this input to Verra.

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128	Throw No More	To fully ascertain the full scope of our impact, it is pivotal to include the appropriate upstream emissions as >70% of the GHG emissions we divert happen upstream. Hence, we would appreciate this forward-thinking methodology to be a true reflection of our activities.	Much of the food's life cycle impacts fall within the agricultural production stage. Using and consuming a higher proportion of available food could therefore, in aggregate, generate reductions in production-related GHG emissions. However, this version of the methodology only considers GHG emissions downstream of an intervention.
129	Toast Ale	We appreciate the work being done to standardise the accounting of FLW prevention. Whilst we are unlikely to use it to create and sell carbon credits, we would like to use it to quantify the positive impact of us using a waste food internally (insetting to net our emissions) and to communicate this benefit to customers (who we will sell the processed otherwise wasted food to so they can use it to reduce their net emissions). This will significantly help us to grow our impact and share the positive impacts of the circular economy.	Thank you for providing this input to Verra.
130	Toast Ale	As noted above, we would want upstream emissions to be included, which we can accurately measure as we are substituting a purposely grown crop for a surplus alternative. Over 70% of the emissions we divert happen upstream so we want this methodology to be a true reflection of our impact	See response in Comment #127.
131	Wageningen University	A common destination for FLW is animal feed; this option is lacking in the methodoly	See responses in Comment #127 and #59.

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		description.	
132	Wageningen University	As explained above, in the proposed methodology the system boudaries exclude the most impacting activities: agricultural production and compost application. This would - next to providing quite inadequate results - not directly support food supply climate impact reduction (could lead to contradictory outcomes to LCA scope 3 analyses).	See responses in Comment #127 and #59.
133	Wageningen University	As for landfilling I would expect differences in GHG factor for composting and combustion.	The emission factors have been updated from the public consultation version of the methodology.
134		We need to add that the FLW inventory must be developed in line with the requirement of the FLW Standard.	Thank you for providing this input to Verra.
135		Typo: replace FWL with FLW (sentence above Table 4).	Thank you for providing this input to Verra.