



Towards a new zero food waste mindset based on holistic assessment

[D7.1] Cross cutting issues accomplishment report

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INDEX

1. Introduction and scope3

 1.1 Specific objectives of the project 3

 1.2 Scope of the deliverable 4

2. DNSH review5

 2.1 Approach..... 5

 2.2 DNSH practical measures during project implementation..... 6

3. Ethics review – Actions involving human participation8

 3.1 Details on the procedures and criteria to identify/recruit research participants 8

 3.2 Templates of the informed consent forms & information sheets 9

4. Ethics review – Actions involving Data Protection and Privacy (DPP)11

 4.1 DPP aim..... 11

 4.2 Data Protection Officer 11

 4.3 Relevance and technical organisation of data collected for the project..... 12

5. Ethics review – Actions involving the use of artificial intelligence13

6. Ethics review – Actions involving the participation of NON-EU COUNTRIES.....14

 6.1 Activities undertaken in non-EU countries..... 14

 6.2 *Data transference between EU and Non-EU countries*..... 14

FIGURES LIST

Figure 1 DNSH proposed workflow 5

Figure 2 DNSH objectives 5

TABLES LIST

Table 1 Specific actions alligned with the six DNSH objectives..... 6

Table 2 DPO team in ToNoWaste 11

1. Introduction and scope

ToNoWaste is a project funded by the European Union under the programme Horizon Europe in the topic HORIZON-CL6-2021-FARM2FORK-01-13.

The project starts 01/09/2022 with a project duration of 48 months.

The mission of ToNoWaste is to encourage actors in European food systems, using evidence-based tools and lessons learned, to make better decisions towards more sustainable food production and consumption patterns.

ToNoWaste main objective is to provide farmers, supply chain companies as well as consumers and policymakers with more objective, integrated, and standardized information about the impacts and global co-benefits of their daily actions in terms of food waste. ToNoWaste will inspire them to co-create a portfolio of positively assessed pathways to shift Europe towards a healthier, more resilient, inclusive, and sustainable food production and consumption.

1.1 Specific objectives of the project

(O1) To Design an open innovation ecosystem that engages European researchers, municipalities, farmers, supply chains and citizens to share open access scientific knowledge about FWPR (Food Waste Prevention and Reduction) and its assessment. (WP1)

ToNoWaste seeks to create synergies with other ongoing actions related to FWPR at EU level keeping in touch with four H2020 sister projects to reuse data and collaborate in the actions assessment for avoiding duplication.

(O2) To unveil what better decision means in the fresh food value chain (FFVC), supporting the FWPR actions with the best impacts for the food system sustainability. (WP1)

ToNoWaste has selected FFVC because Milan urban food policy pact prioritized to make fresh food accessible for all due to its potential to solve dietary-related illnesses (e.g., diabetes, heart disease and cancer). Therefore, O2 will investigate how to make FWPR compatible with FFVC sustainable development with a cost-benefit approach (RO1).

(O3) To co-create a new science-based framework (SBF) for evidence-based decision making in food systems. (WP2)

O3 will look for synergies with H2020 sister projects, city councils and JRC to define logical steps for environmental/social/economic holistic impact FWPR assessment (RO2).

(O4) To transform the SBF into Quantitative Decision-Making Methods (QDMM) that supports researchers and professionals in decisions related to FWPR in the FFVC. (WP2)

O4 requires the SBF decomposition into specific workflows for the fresh products under study, considering its origin and business processes involved to establish the limits of acceptance/significance for each decision maker (RO3).

(O5) To engage more and more FSC actors in the mindset and behavioural shift offering open access to: i) consumer perception of the FWPR problem in fresh food value chain (FFVC) and potential solutions; ii) learning contents, technical guidelines to implement the best practices available - including date marking and smart food packaging, as well as iii)

apps that automate the participation and monitoring process for facilitating decision making for supply chain actors (WP4 and WP5).

The behavioural change will be prompt by results of social research (RO4) focused on understanding the consumers' and producers' perception of the problem and the solutions proposed by decision-makers. ToNoWaste will facilitate the co-creation of FWPR guidelines to identify hotspots of problems, plan actions, assess corrective solutions and document improvements. During Multi-actor workshops and other networking events, we will validate the tools (PR, DEM) by discussing the practical learnings (KH1) and quantitative data from actions assessment (KH2).

(O6) To take advantage of synergies among R&I projects and local/national FWPR actions to co-create specific accounting tools and an integrated platform for assessing the root causes behind FW along the value chain as well as fostering the most beneficial FWPR actions. (WP2 and WP3)

O6 will require the creation of accounting tools for professionals and its integration into an open platform for non-expert users (DEM) to facilitate the decision-making process to all the actors involved in the value chain. DEM will maximize the impact at EU level using open-source technologies as FIWARE. The previous/current FWPR actions in sister H2020 projects will be compared to detect the best practices that maximise the overall positive impacts.

(O7) To foster the organisational change with new coaching services and best practices in FSC. (WP6)

O7 is based on the creation of learning contents, training actions and a business coaching service oriented to support entrepreneurs. ToNoWaste will take advantage from current innovation HUBs related to urban FFVC where food companies (mainly SMEs) can co-create more sustainable business models.

(O8) To co-create new EU policies considering the diversity on regulatory ecology about FWPR. (WP6)

O8 will consider the new accounting and reporting methodology developed for ensuring a deeper integration of sustainability into the corporate governance and regulation of public supporting schemes for innovative businesses (KH4). The project will investigate how to transform the best FWPR actions in terms of KPIs into new standards and labels for fostering the organisational change. The project will use the Covenant of Majors and Milan Urban Food POLICY Pact for the open discussion of the white paper where other agencies like DG AGRI and JRC will be invited.

1.2 Scope of the deliverable

First approach about how to analyse, and guide on ethics and DSNH during the project implementation. We will pay special attention to HUMAN participation, the protection of personal data (POPD), artificial intelligence, non-EU countries participation and the elaboration of the detailed DSNH plan. Internal updates of the technical annexes will be submitted to the ethics advisor to elaborate D9.2, D9.3 and D9.4.

2. DNSH review

2.1 Approach

During the proposal submission ToNoWaste partners carried out a pre-assessment of DNSH to declare there are no actions that can significantly harm to any of the six environmental objectives.

Now partners consulted the “Technical guidance on the application of “do no significant harm” under the Recovery and Resilience Facility Regulation” COMMISSION. Brussels, 12.2.2021. C (2021) 1054 final to design specific actions in Work Packages (WP) to ensure the DNSH principal accomplishment during the implementation but also to foster positive impacts at social level that facilitate the DNSH adoption at EU level.

The methodology was initially used during the proposal (step 0) to demonstrate no significant impact on the six DNSH objectives mentioned in figure 2 and define a simplified approach. Now, partners are revising each one of the WPs to study how to go further and achieve positive impacts and raise public awareness about the importance of DNSH accomplishment (step 1).

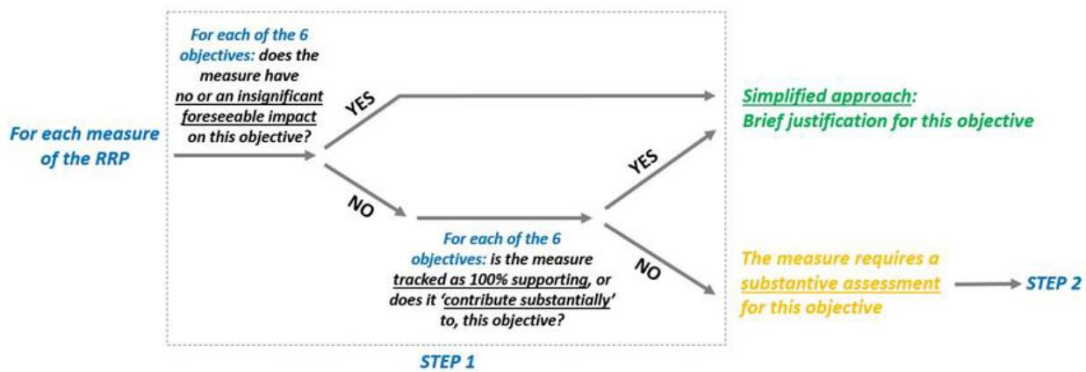


Figure 1 DNSH proposed workflow

What is ‘do no significant harm’ (DNSH)?

- The Regulation establishing the Recovery and Resilience Facility (RRF) provides that **no measure** (i.e., no reform and no investment) included in a Member State’s Recovery and Resilience Plan (RRP) should **lead to significant harm to any of the six environmental objectives** within the meaning of **Article 17** of the Taxonomy Regulation:



- The Commission adopted [Technical Guidance on DNSH](#) on 12 February 2021

3



Figure 2 DNSH objectives (source https://ec.europa.eu/info/sites/default/files/2021_02_18_epc_do_not_significant_harm_-_technical_guidance_by_the_commission.pdf)

2.2 DNSH practical measures during project implementation

The outcome of the Kick Off Meeting working session is the following table with specific actions

Table 1 Specific actions aligned with the six DNSH objectives

Environmental objectives	Yes	No	Step 0 - What we said in the proposal	Step 1 – What we must do during the implementation of the project
Climate change mitigation		X	ToNoWaste framework is a holistic approach in which carbon footprint reduction plays a crucial role to combine the food waste and climate impact reduction. The project and its partnership will not foster any action with negative carbon footprint assessment.	<ul style="list-style-type: none"> - Try to source from local suppliers in demonstrative actions (WP5), avoid small orders, analyse the logistical cost of the proposed actions. - All WPs will avoid unnecessary travelling by dealing with the issues that can be optimally managed online.
Climate change adaptation		X	ToNoWaste is based on the principles of sustainable food, and it will specifically address the agri-food sector challenges about how to bring together local communities' resilience and economic competitive edge to be affordable. Valencia & Vienna as signatory members of Covenant of Majors will foster the methodology adoption in the different networking groups.	<ul style="list-style-type: none"> - Dissemination content (WP7): Include content on DNSH relevance and climate change adaptation actions being undertaken by cities. Highlight the impact of food waste on climate change.
Sustainable use and protection of water & marine resources		X	All the stakeholders directly or indirectly involved in the project as farmers and producers respect the common agricultural policy (CAP) measures and CACV partner is the leading	<ul style="list-style-type: none"> - Demonstrative actions (WP5) : Select stakeholders who respect the CAP with sustainable crop management practices. - Dissemination contents (WP7): highlighting cap's

			entity to monitor the accomplishment and foster new principles from new policies through COGECA	relationship with food waste prevention through the EU platform on food loses and EIP-AGRI
Circular economy, including waste prevention & recycling		X	ToNoWaste project is focused on local and circular Agri-food value chains/participatory actions with low environmental impact that were validated in previous H2020 projects. Future networking actions with these initiatives will ensure the circular economy principles adoption.	- DNSH dissemination contents sharing with sister project CHORIZOs (WP7). WP1 will foster research for the definition of the SBF for FWPR that includes CE principles. - WP6 will consider circular economy principles in the coaching service to AGRO LAB start-up accelerator to design business models aligned with these CE principles.
Protection and restoration of biodiversity & ecosystems		X	ToNoWaste action plan was specifically designed to compatibilism the protection and restoration of rural ecosystems. We will pay special attention to the recovery of the forests surrounding the farmlands as well as to foster actions (e.g., smart packaging) for the sustainable exploitation/conservation of these areas as a mechanism for the empowerment of rural communities.	- Launching cross-cutting actions to reduce the impact of demonstration actions remarking the packaging impact on ecosystems (WP5)

3. Ethics review – Actions involving human participation

3.1 Details on the procedures and criteria to identify/recruit

research participants

Question: Details on the procedures and criteria that will be used to identify/recruit research participants must be submitted as a deliverable.

General procedure: ToNoWaste project can involve the participation of children/minors and vulnerable groups in the demonstrative/citizenship actions, but they are not considered "respondents" because they will not be personally identified or interviewed. Project will not collect any personal or sensitive information that would allow them to be identified as vulnerable. Furthermore, the project does not involve the collection of any sensitive information whatsoever, physical interventions like medical interventions, nor the collection of biological samples.

The recruitment will be carried out by WP1, WP4 and WP5 partners and other stakeholders participating in the External Advisory board. The human participants will be engaged on volunteering basis through a variety of channels as:

- Email among affiliated farmers to agrarian associations
- Social media (Twitter, LinkedIn, Facebook...)
- Publishing media

Recruiters will avoid any kind of discrimination and will try to make the participating population as inclusive as possible. Only the partners directly involved with the recruitment will be able to trace participants (if needed), and then send the data pseudo-anonymised for further analysis and storage.

Human groups involved in the project must be divided into:

- a) Citizens attending to project open events: In general, organisers will avoid asking personal data that can allow to identify them. If this is not possible, its personal data will be pseudo-anonymised in accordance with the deliverable Data privacy ethics review before transferring it. General public will be recruited using Social and Publishing media channels.
- b) Stakeholders participating in workshops or technical events: Organisers will inform all the humans involved as stakeholders in project events about the use of the data collected and who will be the guardian of the research data according with principles established in the Declaration Of Consent.

Partners leading the monitoring of the recruitment process will be WU, UJI and OEAW.

The main target groups will be:

- A) CACV, BIO, ZWA associated farmers.
- B) Consumers and professionals identified in MERC, CUIN, EROS, CARI
- C) Local associations, public entities or policymakers detected by LNV

Specific procedure: If specific action with vulnerable groups is required, a specific procedure will be developed in advance with the help of the Caritas ethics department and under the guidance of the Ethics advisor.

We have agreed the following additional measures:

- In the case of children/minors, the teachers/parents will answer and revise the questionnaires.
- In the case of other vulnerable groups, the entity that leads any action will supervise: i) there are no specific questions for these groups; ii) questions are formulated in a respectful and inclusive way; iii) data is managed properly to avoid the potential misuse.

- Detailed information on the informed consent procedures that will be implemented for the participation of humans and regarding data processing must be submitted as a deliverable.

The consent procedure is an important aspect to participate in RIA (Research and Innovation Action) project. Before requesting consent, the partner involved in the action shall make sure that the potential participant, or her/his legal representative, has received written, and if desirable oral, information.

This information will be provided by the leaders of each action in such a way that it is probable that the potential participant, or her/his legal representative, understands the contents. Furthermore, we will give time to make a proper decision on the requested consent. Participants will be informed that: i) they are free to withdraw from participation at any point; ii) they can withdraw partially for specific parts (for example images, videorecording); that their personal data will remain confidential and pseudo anonymized if must be transferred to other researchers and; iii) that collected data will be analysed for (sub)groups of participants, rather than individually, thus securing their privacy.

Detailed information (in line with Art 13, 14 GDPR) will be available to the potential participants by means of an information sheet including descriptions / specifications of:

- Purpose of the research.
- Duration of the research activities;
- Adopted procedures;
- Voluntary participation;
- Possible risks, discomfort or disadvantages;
- benefits to the subject or others;
- data protection and confidentiality and privacy policies;
- where to get more information;
- what happens to data, samples and results at the end of the research.

A sample informed consent document, including this information sheet, is provided in the next section. The document will be downloadable from the Project website, possibly in translated versions for activities involving non- English native speakers.

3.2 Templates of the informed consent forms & information sheets

There will be various informed consent forms and information sheets, depending on the group of participants and way of data collection. As an example, the following form will be provided for workshop and knowledge transfer action participants:

CONSENT FORM FOR THE PARTICIPATION in the project TONOWASTE

By giving your consent to participate in workshops and/or knowledge transfer actions, you authorise selected members of the ToNoWaste Consortium (data controller) to use your data in accordance with the privacy policy described below. You may withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before the withdrawal.

I authorize the use of my data:

Yes

No

Acknowledgement of acceptance:

Date and place

Signed

Privacy policy: In accordance with the provisions of the General Data Protection Regulation (EU) 2016/679 of April 27, 2016 (GDPR), we inform you that the personal data and questionnaires, collected from you during the workshops and/or knowledge transfer actions or from public sources, will be treated under the responsibility of ToNoWaste Consortium data controllers (these Consortium members are considered joint controllers within the meaning of Art 26 GDPR), for analysing project results and sending communications about events with interested parties (contacts, customers, suppliers, employees and public bodies). The legal basis of processing your data is your free and informed consent to participate in the project, see Art 6(1)(a) and Art 9(2)(a) GDPR. Your data will be kept for ten years as long as there is a mutual interest to do so or until you withdraw your consent given above. The data will not be transferred or communicated to third parties outside the Consortium although the project results will be published aggregated.

Data controller

(to be adapted to each action)

Place of data use

The information will be used strictly confidentially by the Consortium for social research. All the personal data collected from questionnaires will be integrated and pseudo anonymized before transferring it or fully anonymised if personal data is not relevant.

Purpose: Your data will be processed during the EU project ToNoWaste, which aims to assess the impact of food waste in Europe to contribute to the reduction of food waste

The engagement of consumers participation in social research and data acquisition from users enrolled about its perception of the Food Waste problem, its societal impacts and potential solutions. This information will be used to design future policies and support instruments that will contribute to solving the problem at European level. Process data from food sector to connect all components of the food chain in the EU to heighten awareness about the importance and impact of food waste prevention.

Type of data used: Personal data voluntarily provided by you during the workshop and/or questionnaires used in APP and/or other knowledge transfer actions. Furthermore, personal data provided by you upon registering (as part of the questionnaire) and data from smartphone apps.

Provision of data: Registering on the application, filling in project questionnaires or sending one's own personal data imply giving consent to the use of data for the above-mentioned purposes.

Mode of use

Universitat Jaume I (UJI) as the responsible consortium member for the data collection will ensure that identifying information (personal details) will be replaced by an identification number. The file that links the identification number to personal details is kept only by UJI in a secure place. Solely the pseudonymized data file will be shared among a select group of other consortium members (see section data controller) who will use the data as described above.

Rights of the parties

We inform you that you can exercise the rights of access, rectification, portability and deletion of your data and those of limitation and opposition to your treatment by addressing an email to UJI tonowaste@uji.es. If you consider that the treatment does not comply with current regulations, you can submit a claim to the competent supervisory authority, e.g. to the authority in Spain at www.agpd.es



4. Ethics review – Actions involving Data Protection and Privacy (DPP)

4.1 DPP aim

To ensure that data will be handled correctly within the bodies dealing with the participant's personal data in ToNoWaste. This deliverable will amongst all define some basic concepts of the General Data Protection Regulation (EU) 2016/679 (GDPR).

Regulation considered in ToNoWaste for POPD assessment

- Regulation (EU) 2016/679

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data on the free movement of such data, and repealing Directive 95/46/EC, will enter into force May 25 2018.

4.2 Data Protection Officer

- The beneficiary must confirm that it has appointed a Data Protection Officer (DPO) and the contact details of the DPO are made available to all data subjects involved in the research. For beneficiaries not required to appoint a DPO under the GDPR a detailed data protection policy for the project must be kept on file (to be specified in the grant agreement) and submitted to the Agency upon request. The confirmation for each beneficiary must be submitted as a deliverable.

According to Art 37 GDPR a controller shall designate a data protection officer if specific criteria are met. The project coordinator in ToNoWaste (UJI) has appointed Juana Maria Rivera-Lirio (jriviera@uji.es) as responsible person for data protection (DPR) of the project. The DPR shall deal with and coordinate all data protection topics and measures and shall also be the contact point for data subjects.

ToNoWaste DPR has contacted all the partners to certify that all the partners will accomplish with the GDPR and all the partners declared a specific contact person responsible for data protection for the project:

Table 2 DPO team in ToNoWaste

Name	Entity
Juan Jose Candel Bou (jcandel@zabala.es)	ZAB
Juana Maria Rivera-Lirio (jriviera@uji.es)	UJI
Fernando Gago Rey (dpo@eroski.es)	EROS
Ainhoa Alonso Vicario (ainhoa.alonso@deusto.es) & Mikel García Llorente (privacidad@deusto.es, dpo@deusto.es)	UD
Maria Barreiro <Maria.Barreiro@hig.se>	HIG
Ainara Llona (ainara_llona@eroski.es)	EROS
Fèlix Segarra Beltran (felix@cuinatur.com)	CUIN
Egon Cervera López (ecervera@agro-alimentariescv.coop)	CACV
Klas Tallvid <klas.tallvid@hufb.se>	HEA
Konstantina Papadopoulou (kpapado@chemeng.ntua.gr)	HAL
Roger Markgraf-Bye (personvernombud@uio.no)	UIO
Nicolas Katzer (nicolas.katzer@strat.eco)	STRA
Lorraine Wenzel (lorraine@zerowasteaustria.at)	ZWA

Julia Tauber-Lewisich <Julia.Tauber-Lewisich@caritas-wien.at>	CARI
Eva Rodrigues (Zenithwings)" <erodrigues@zenithwings.com>	ZEN
Lola Vicente Almazán <lola.valmazan@lasnaves.com>	LNV
Mahshid Sotoudeh (msotoud@oeaw.ac.at) ÖAW (contact: datenschutz@oeaw.ac.at)	OEAW
Franz Niederl niederl@akaryon.com	AKAR
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julia.tauber-lewisich@caritas-wien-at	CARI
Vicen Mañez Martínez <vmanez@mercavalencia.es>	MERC
manuela.maria.fischer@perspektive-handel.at wolfgang.scheidl@perspektive-handel.at	PERS

4.3 Relevance and technical organisation of data collected for the project

- The beneficiary must explain how all the data they intend to process is relevant and limited to the purposes of the research project (in accordance with the 'data minimisation 'principle).
- Description of the technical and organisational measures that will be implemented to safeguard the rights and freedoms of the data subjects/research participants, a description of the security measures that will be implemented to prevent unauthorised access to personal data or the equipment used for processing, including a description of the anonymisation/pseudonymisation techniques.

Personal data collected in the ToNoWaste project will come from three different sources:

- WP1- stakeholders participating in workshops
- WP2 – stakeholders participating in KPIs definition
- WP4- social research using interviews and questionnaires among consumers.
- WP5 – citizens participating in pilots demonstrative actions
- WP7 – citizens in dissemination and communication actions

All the actions will collect personal data about consumers as gender, age and opinions in specific issues related to food waste prevention. The custodian of the data will be the leading entity of each WP, if this information is transferred to other European partners, the personal data of the person participating in the study will be pseudonymized and where possible anonymized. If necessary, agreements concerning data protection shall be concluded among the consortium members beforehand.

The technical organisation of the data collected will be as follows:

1. Datasets that are collected anonymously (no identifying personal information in the dataset), and which could be shared among a select group of project partners who analyse the data (using the SharePoint folder for each WP).
2. Datasets that are pseudonymized. The action leader will identify information (personal details) to be replaced by an identification number. The file that links identification number to personal details is kept only by the leader in a secure place (e.g. partner who collected the data). The pseudonymized data file can be shared among a select group of project partners who analyse the data (using the SharePoint folder for each WP).

3. Sensitive data that cannot be pseudonymized. Such as video recordings that show the participant's face. This type of data will be safely stored in a secure place by the partner who collected the data (or the WP lead) and is not shared. Coded information from the images or videos could be shared under request by other researchers.

5. Ethics review – Actions involving the use of artificial intelligence

In ToNoWaste the use of artificial intelligence is aimed to automatise manual tasks during data management, and it does not involve the processing of personal data. AI is limited to:

1. Meta-analysis to combine, contrast and synthesise (in a systematic way) the results of different studies to reduce food waste. This will allow the identification of patterns between the results of European initiatives and projects on waste reduction within multiple contexts. In turn, this meta-analysis will facilitate the characterisation of the differences between the results achieved by the initiatives and will allow the suggestion of lines of action regarding the most effective strategies for waste reduction within different contexts with specific social, environmental and economic characteristics.
2. Data mining for the automatic identification of patterns and prediction of waste generation trends.
3. Data analytics for the identification of the intrinsic and extrinsic factors that are most determinant in the generation of waste within the supply chain.
4. Data mining for the prediction of future scenarios for the reduction of waste generation according to different reduction strategies.

It is not expected to process with artificial intelligence personal or sensitive data about those humans involved.

ToNoWaste platform and tools (in WP3) will be designed following Ethics By Design and Ethics of Use Approaches for Artificial Intelligence defined by the European Commission for ensuring:

- AI systems must not negatively affect human autonomy, freedom or dignity.
- AI systems must not violate the right to privacy and to personal data protection.
- AI systems must be developed with an inclusive fair, and non-discriminatory agenda.
- Steps must be taken to ensure that AI systems do not cause individual, social or environmental harm, rely on harmful technologies.
- AI systems should be as transparent as possible to their stakeholders and to their end-users.
- Human oversight and accountability are required to ensure conformance to these principles and address non-compliance.

6. Ethics review – Actions involving the participation of NON-EU COUNTRIES

6.1 Activities undertaken in non-EU countries

- In case activities undertaken in non-EU countries raise ethics issues, the applicants must ensure that the research conducted outside the EU is legal in at least one EU Member State. This must be specified in the grant agreement.

ToNoWaste project does neither involve the participation of children/minor nor vulnerable groups nor patients. Furthermore, the project does not involve physical interventions like medical interventions and collection of human biological samples.

Material that may be considered sensitive shall not be exchanged with Norway (UiO). The collaboration is limited to the exchange of public data (e.g. strategies and public policies) as well as research data from the social survey questionnaires or from the use of the software platform developed in the project to assess the food waste impact.

6.2 Data transference between EU and Non-EU countries

- In case personal data are transferred from the EU to a non-EU country or international organisation, confirmation that such transfers are in accordance with Chapter V of the General Data Protection Regulation 2016/679, must be submitted as a deliverable.

- In case personal data are transferred from a non-EU country to the EU (or another third state), confirmation that such transfers comply with the laws of the country in which the data was collected must be submitted as a deliverable.

In ToNoWaste project is not expected the personal data transference from the EU to a non-EU country or vice versa. Consortium will first anonymise personal data from consumers to facilitate research data to the professional staff of the beneficiaries and other external advisory boards who participate in the project actions.

In the case of needing to share other personal data, the beneficiaries involved will inform the data protection officer in advance about the scope of the information, the purpose and the mechanisms used to ensure compliance with the current POPD regulation.

The transferred research data will be grouped into labelled datasets to allow traceability and monitoring by the external ethics advisor.
