

# ACHIEVING TRANSPARENCY AND FOOD WASTE REDUCTION FOR BUSINESSES THROUGH AMBITIOUS POLICIES AND REGULATION

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## › When there's no waste, there's a way (to net zero)

A call for policy for food waste prevention

### KEY TAKEAWAYS

- Food is a climate issue: food waste is both a hidden barrier and an untapped opportunity to help reach net zero UK emissions. Addressing food waste is a 'no regrets' policy option.
- Halving UK food waste and reforesting liberated domestic grassland could deliver roughly 4% of the emissions cuts the UK needs to reach net zero\* - plus contribute significantly to reducing the overseas emissions and land use from UK imports.
- While there have been some reductions in food waste through voluntary initiatives, the UK is not currently on track to halve food waste in line with an ambitious interpretation of SDG 12.3, and progress must accelerate: regulatory intervention will be necessary to realise the potential of food waste as a climate solution including binding targets and incorporating food waste reduction into climate change action frameworks, as well as into land use, agriculture and other policies.
- There is and has always been public support for government regulatory action on food waste. Addressing food waste from farm to fork, including in households, as part of an ambitious food and agriculture-focused climate policy is an opportunity for the UK to lead an international agenda to mitigate the environmental impacts of our food system.



## GREEN GAS WITHOUT THE HOT AIR

Defining the true role of biogas in a net zero future



## FARMERS TALK FOOD WASTE

Supermarkets' role in crop waste on UK farms



## FEEDING SURPLUS FOOD TO PIGS SAFELY

A win-win for farmers and the environment



## CAUSES OF FOOD WASTE IN INTERNATIONAL SUPPLY CHAINS

A REPORT BY FEEDBACK FUNDED BY THE ROCKEFELLER FOUNDATION

**An estimated**

**40%**

**of the world's food**

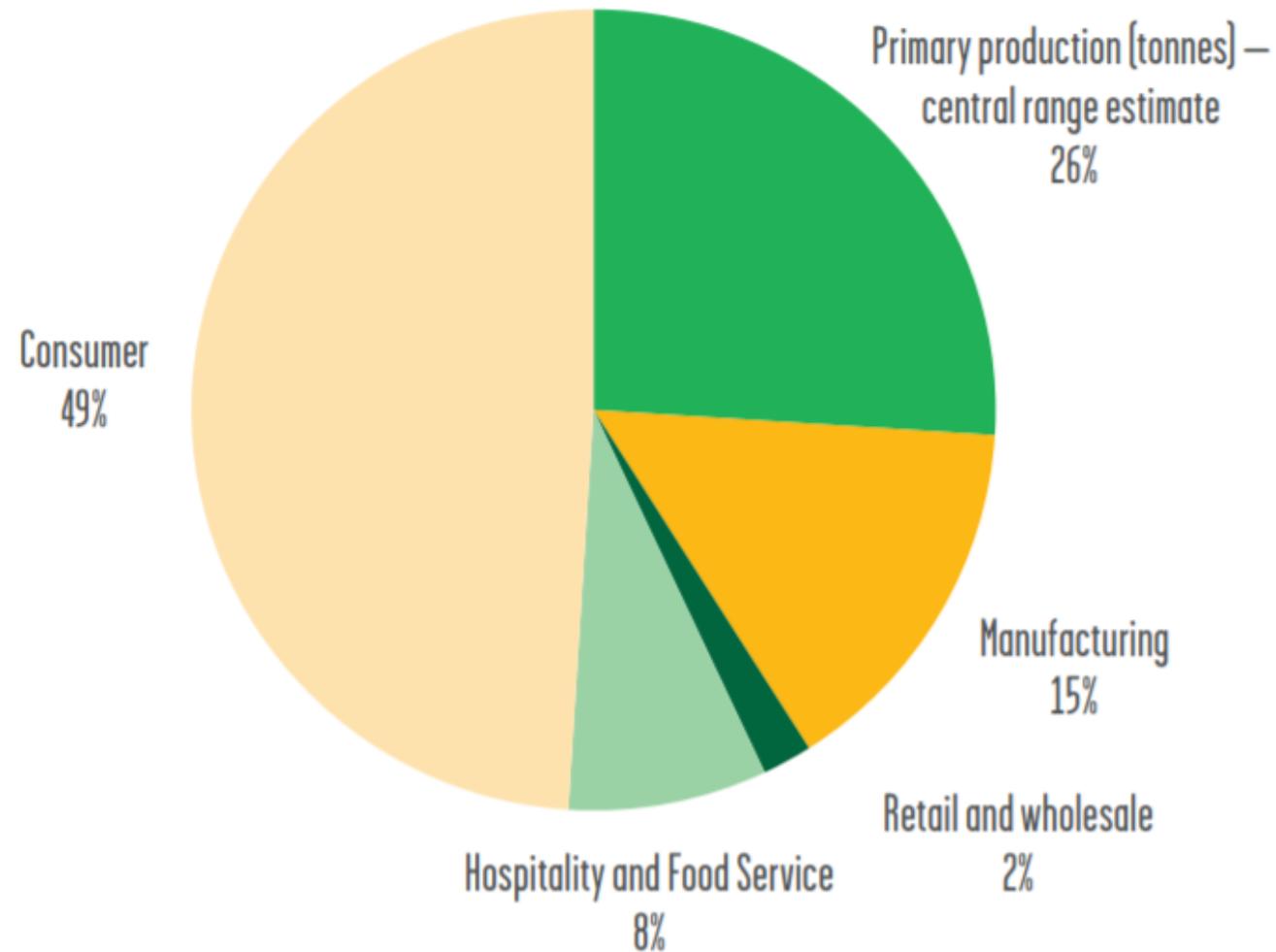
**is wasted**



- **Enough to feed everyone currently food insecure plus everyone expected on the planet by 2050**
- **Causes about 8% of total anthropogenic GHG emissions**
- **Uses land equivalent to China and India combined – which could be rewilded to restore biodiversity and mitigate climate change, and used to feed the world sustainably**

## FIGURE 5: BREAKDOWN OF UK FOOD WASTE ACROSS THE SUPPLY CHAIN, WITH ESTIMATES OF FARM-LEVEL WASTE INCLUDED

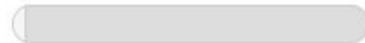
UK food waste and surplus 'not redistributed', by supply chain stage (tonnes)





# Consultation on improved reporting of food waste by large food businesses in England

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Closes 5 Sep 2022

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## Introduction

The government wants to leave the environment in a better condition for the next generation. The 25 Year Environment Plan<sup>[1]</sup>, the Clean Growth Strategy<sup>[2]</sup> and the Resources and Waste Strategy for England<sup>[3]</sup> (RWS) outlined the steps that will be taken in to achieve that goal. Chapter 5 of the RWS outlines the UK government's approach to food waste in England and in it we pledged to consult on annual reporting of food surplus and waste by food businesses. Sustainability is a key element of the Government Food Strategy White Paper which is a once in a

# **MANDATORY FOOD WASTE REPORTING**

**7. Do you have a preferred option? (Please see IA for more information in relation to the options)**

(Required)

- Do nothing
- Option 1
- Option 2
- Not sure/don't have an opinion

Option 1 – enhance current voluntary agreements by extending the Field Force, which is a team of sector specialists, to accelerate the take-up of voluntary measurement and reporting of food waste by businesses;

Option 2 - require food waste measurement and reporting for large food businesses.

Option 3 - require food waste measurement and reporting for large and medium-sized businesses.

## **WHY NOT “DO NOTHING”?**

- **70% of Food Waste Reduction Roadmap signatories were still not reporting data publicly in 2021**
- **Virtually no voluntary reporting by primary producers – meaning there is no baseline data for the sector and it is excluded from Courtauld.**
- **The UK has no accurate sense of whether HAFS food waste is changing over time, due to lack of HAFS measurement and reporting – making it impossible to accurately assess progress towards SDG 12.3. WRAP estimate that HAFS food waste increased 19% from 920,000 tonnes in 2011 to 1.1 million tonnes in 2018, but this not based on accurate data**
- **HAFS has been included in Courtauld for over 10 years since 2011 – over 10 years of voluntary agreement hasn’t yielded voluntary reporting.**

## WHY NOT OPTION 1? (ENHANCED VOLUNTARY REPORTING)

Doesn't address any of the fundamental barriers to reporting currently – just proposes hiring some more sector specialists to be hired to encourage businesses to report voluntarily.

But this won't work. 70% of Food Waste Reduction Roadmap signatories were still not reporting data publicly in 2021, showing even the businesses most engaged by WRAP are resistant to publicly publishing data. WRAP's capacity to engage businesses isn't the barrier.



The government's own impact assessment states that:

*“Under Option 1, WRAP expect a limited number of additional businesses to sign up to the enhanced voluntary agreement due to a number of barriers [...] The value for money calculation reveals that this option is more expensive than the other two options with significantly less food waste being targeted”*

# WHY MANDATORY REPORTING?

- WRAP called the fact that 70% of Food Waste Reduction Roadmap signatories were still not reporting data publicly in 2021 “disappointing” and concluded that “mandatory food surplus and waste reporting are essential if SDG 12.3 is to be achieved”.
- Regulation is necessary to remove the valid fear firms have of being a first-mover and risking negative publicity by providing a level playing field.
- It’s cost-effective, and will save businesses money
- Increased consumer awareness of a business’ food waste production and business’ desire to mitigate reputational risk will further drive food waste reduction.

# THE BENEFITS OF TRANSPARENCY

- **You can't manage what you don't measure**
- **Levels the playing field – so first movers are not penalised**
- **Saving waste will save businesses money, more than offsetting costs of measurement**
- **Will help target and test interventions to see what's effective**
- **Enables both sharing of best-practice and competition for improvements**
- **Will speed our progress to meet the Sustainable Development Goal 12.3 to halve food waste by 2030 – and enable the government to put policies in place to support businesses to achieve this**



House of Commons

Environment, Food and Rural  
Affairs Committee

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## Food waste in England

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**Eighth Report of Session 2016–17**

54. *We commend Tesco for publishing its food waste data from across the supply chain. Sainsbury's is moving in the same direction, but needs more transparency. The fact that no other retailers have followed their lead shows that a voluntary approach is inadequate. We recommend that the incoming Government requires food businesses over a particular size to publicly report data on food waste. This would create much more transparency.*



# UK will miss SDG on food waste unless mandatory reporting is introduced

24 September 2019

**Publishing food waste data is vital and must be mandatory if the UK is to achieve SDG 12.3 to halve food waste by 2030. The Government has indicated it will introduce mandatory reporting and we call on them to do this urgently.”**

**REPORT SEPARATELY BY  
DESTINATION IN FOOD  
WASTE HIERARCHY**

Statutory guidance

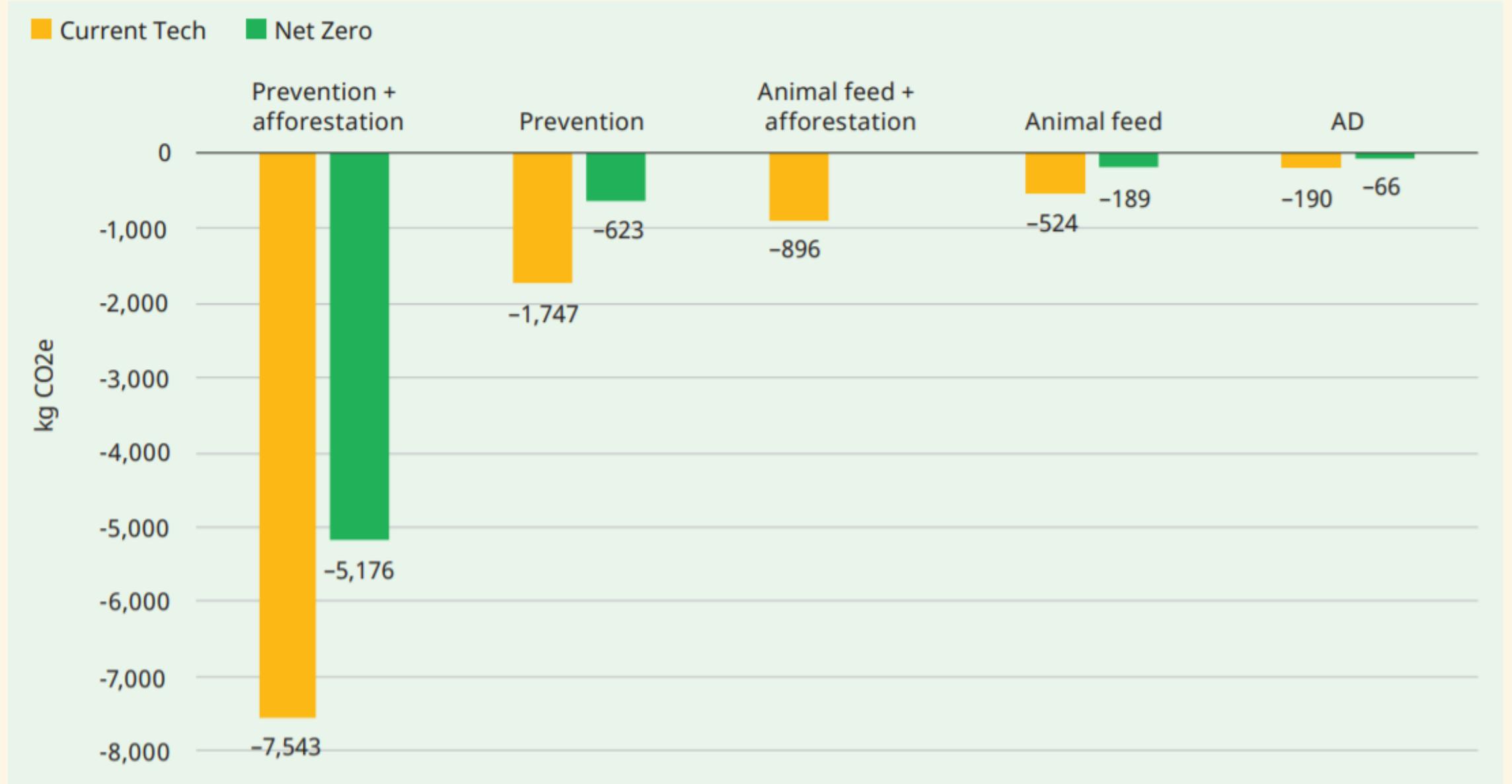
# Food and drink waste hierarchy: deal with surplus and waste

Updated 1 April 2021

You should deal with food and drink surplus and waste using the hierarchy's prioritised list of options. If you cannot use an option, move to the next one.

1. Prevent surplus and waste in your business.
2. Redistribute surplus food.
3. Make animal feed from former food.
4. Recycle your food waste - anaerobic digestion.
5. Recycle your food waste - composting.
6. Recycle your food waste - landspreading.
7. Incinerate to generate energy.
8. Incinerate without generating energy.
9. Send to landfill or sewer.

**Figure 9:** Emissions savings by food waste destination in current technology and net zero contexts (per tonne of food waste)



**INCLUDING MEDIUM-SIZED  
FOOD BUSINESSES**

**20. Do you agree that medium-sized businesses should be outside the scope for any regulations?**

- Yes
- No
- Neither/mixed
- Not sure/don't have an opinion

**21. Please briefly state your reasons for your response. Where available, please share evidence to support your view. (200 words max)**

# HOW DO THE GOVERNMENT DEFINE LARGE AND MEDIUM-SIZED BUSINESSES?

## Definition of large businesses and medium-sized businesses

Businesses will be considered large if at least two of the following criteria are satisfied:

- Turnover of £36m or more
- Balance sheet of £18m or more
- 250 employees or more

A business will be considered medium if at least two of the following criteria are satisfied:

- between 50 and 249 employees
- Annual turnover between £10.2 million and £35.9 million
- Annual balance sheet total between £5.1 million and £17.9 million

## **WHY INCLUDE MEDIUM-SIZED BUSINESSES IN MANDATORY REPORTING?**

- **Large businesses would only cover 47% of HAFS food waste (inadequate coverage) – including medium sized businesses too, this would rise to 60% (possibly more)**
- **No/very few primary producers count as large food businesses – the UK's largest primary producers which we examined qualified as medium-sized**
- **For manufacturing – better coverage (77%), but including medium-sized would boost this to 93%**
- **Medium sized businesses never measured before – big data gap to fill (might waste higher % of food)**

# **COSTS OF INCLUDING MEDIUM-SIZED BUSINESSES IN MANDATORY REPORTING?**

- **Government's impact assessment finds start-up costs for medium-sized businesses of about £1,600, an annual fee of about £140, and staff time of 2.5-12.5 days/year for different types of business.**
- **Government's own impact assessment finds would only cost £19.18 per tonne food waste**
- **Mandatory reporting will lower costs associated with labour, technical resources and profitability due to market forces**
- **Many businesses will have ready access to this data through their current waste management services**

# **BENEFITS OF INCLUDING MEDIUM-SIZED BUSINESSES IN MANDATORY REPORTING?**

- **A study of 1,200 companies across 17 countries found that 99% reported a positive return on investment in food waste reduction, with an average cost-benefit ratio for businesses of 14:1**
  - **For restaurants 8.3:1**
  - **For retail/manufacturing 5.1:1**
  - **For hospitality 22.7:1**
- **In the impact assessment, it states that only 8,818 tonnes of food waste would have to be reduced to offset the costs of Option 3 over 10 years - only 0.5% of 1,907,777 tonnes of food waste estimated in England's large and medium-sized businesses, certainly achievable.**
- **The impact assessment also shows that for each medium-sized business, if food waste measurement leads to food waste reduction of just over half a tonne, it will offset the costs of measurement**

**NO MORE DELAYS**

# Ministers accused of using pandemic as excuse to delay food waste reporting

Consultation with firms in England on mandatory reporting deferred to 2021

**Rebecca Smithers**  
*Consumer affairs correspondent*

Mon 16 Nov 2020 06.01 GMT



▲ Companies could be required to report on food waste in their supply chains as a result of postponed consultation with Defra. Photograph: Nick Ansell/PA

**44. Do you agree with the timeline for introduction proposed above for Option 2?**

- Yes
- No
- Neither/mixed
- Not sure/don't have an opinion

**45. If you answered no, please briefly state your reasons. (200 words max)**

## **A TIMELINE OF DELAY — THE GOVERNMENT’S PROPOSED TIMELINE:**

**May wait 3 years until 2025 to require businesses to report food waste**

## **OUR PROPOSED TIMELINE:**

- 2023 – Businesses who already have the data privately publish data immediately**
- 2024 – Businesses over certain size have to publish data for 2023/24 year**
- 2025 – Farms could be allowed an extra year, to develop template methodology**

# **INCLUSION OF FARMS IN REPORTING**

## Businesses in scope

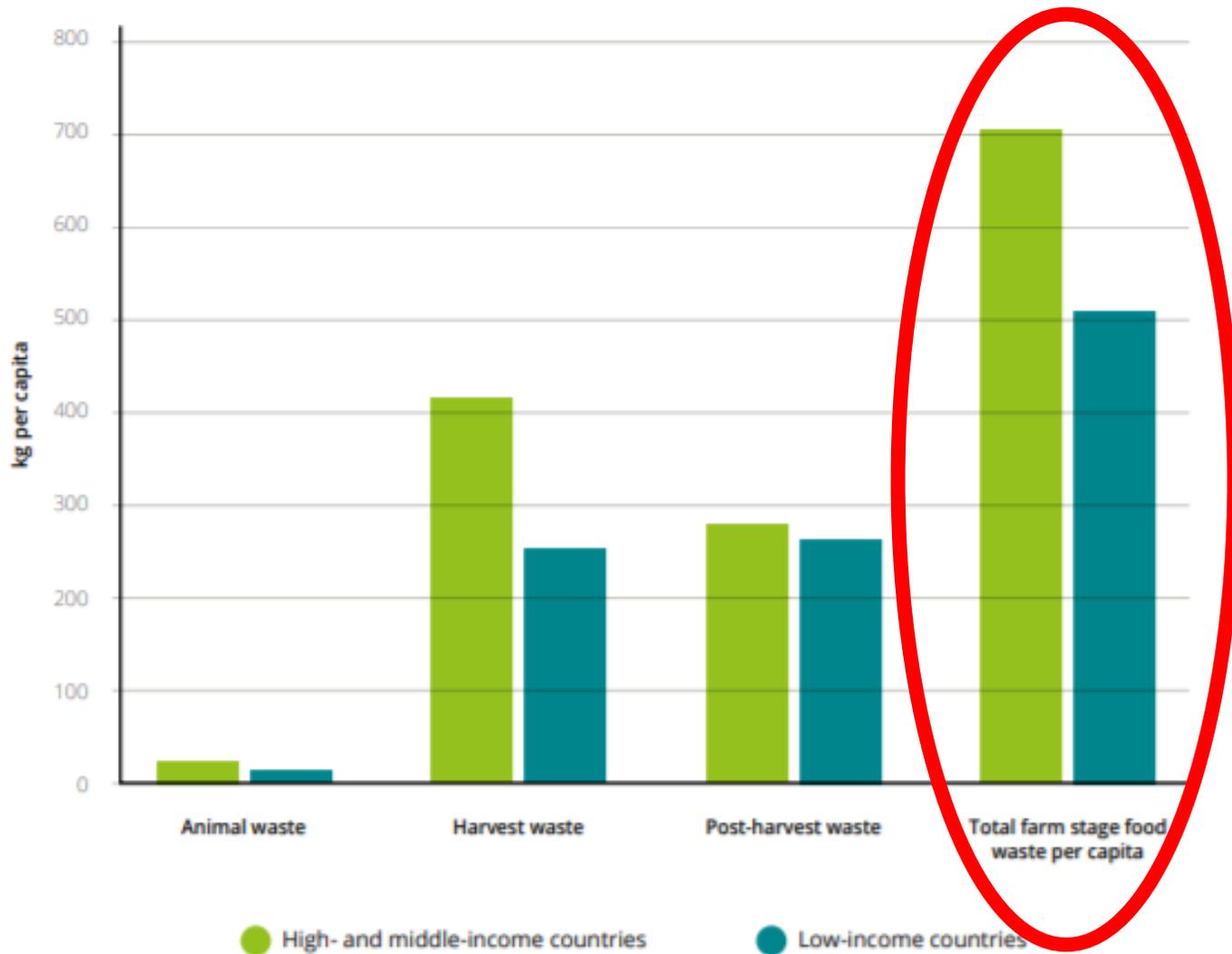
We would expect, subject to consultation, the following types of businesses would be required to measure and report food waste under Option 2, where they also meet the criteria for a large business:

- Food packing business
- Food manufacturers
- Food wholesalers
- Food retailers
- Caterers
- Hospitality and food service (restaurants, pubs, quick service restaurants, takeaways)
- Internet-based organisations that manage, distribute or produce food (for example, an internet-based organisation who manages food in a warehouse or arranges the distribution of food)
- Commercial food redistribution organisations

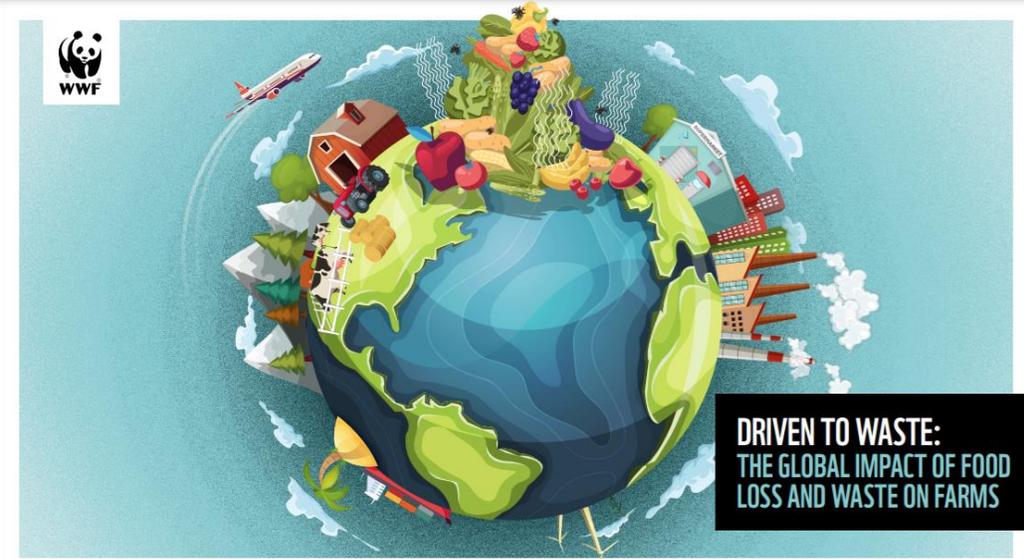
### 22. Do you agree with the list of businesses which would be required to report under Option 2?

- Yes
- No

If you answered 'No', please provide further detail of what changes you would make and why. (200 words max)

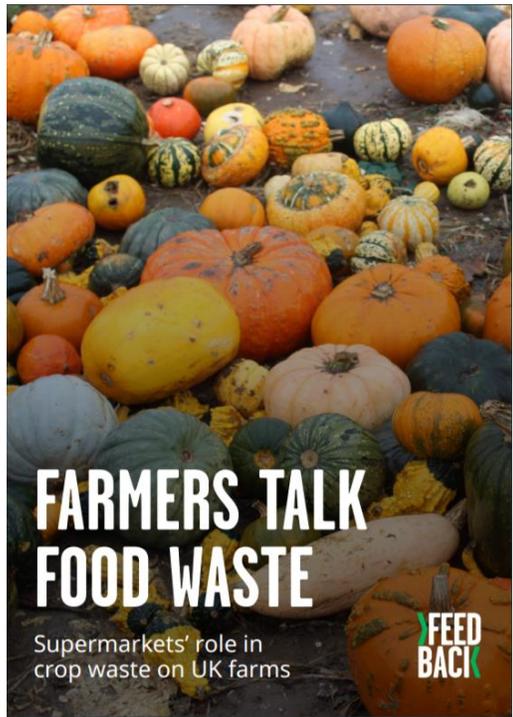


**Figure 3**  
Per capita farm stage food waste by region (kg/year)



**58% OF GLOBAL HARVEST STAGE WASTE** occurs in the high -and middle-income countries of Europe, North America and Industrialised Asia<sup>1</sup> – despite these countries having higher on-farm mechanisation and only 37% of the global population.

UK farmer had to waste about 25% of their carrots due to cosmetic rejections – nearly 22 million portions/year



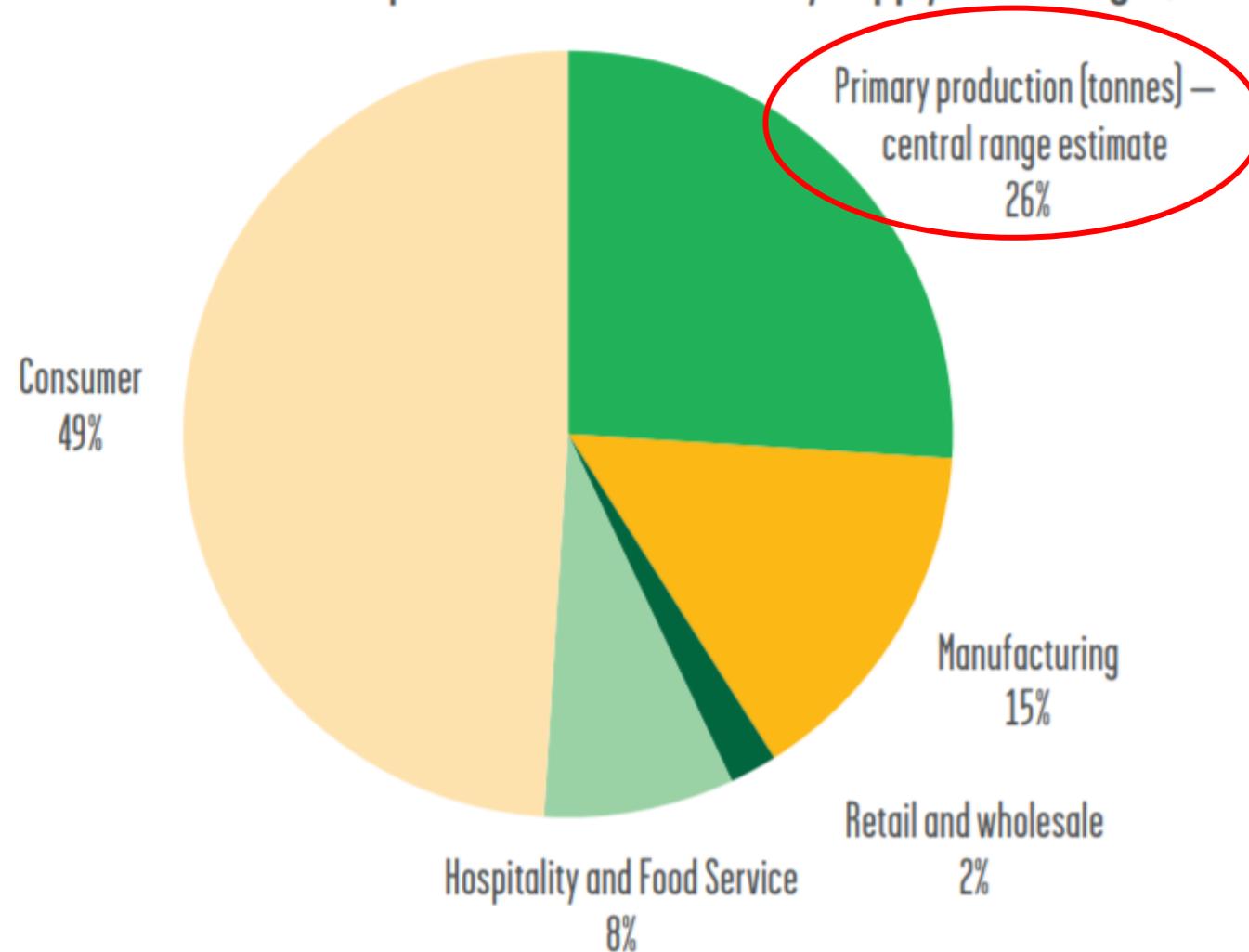
**FARMERS TALK  
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Supermarkets' role in  
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## FIGURE 5: BREAKDOWN OF UK FOOD WASTE ACROSS THE SUPPLY CHAIN, WITH ESTIMATES OF FARM-LEVEL WASTE INCLUDED

UK food waste and surplus 'not redistributed', by supply chain stage (tonnes)



## GUIDANCE ON INTERPRETING SUSTAINABLE DEVELOPMENT GOAL TARGET 12.3

12 RESPONSIBLE  
CONSUMPTION  
AND PRODUCTION



- 1. What sectors are covered?** One should interpret Target 12.3 as covering the *entire* food supply chain, from the point that crops and livestock are ready for harvest or slaughter through to the point that they are ready to be ingested by people (Figure 1). Entities should seek to reduce

# WHY INCLUDE PRIMARY PRODUCTION FOOD WASTE?

- **Excluding it would exclude 50-58% of business food waste and surplus from scope.**
- **It is inconsistent to cover other sectors but not at primary production**
- **It risks food waste being pushed onto farmers to disappear it from official statistics, harming farmers and accurate data collection.**
- **Lack of data on food waste in primary production is so severe that it is the only sector currently excluded from Courtauld due to lack of an accurate baseline.**
- **Lack of data on primary production food waste is a global issue – mandatory reporting provides the opportunity for the UK to be a global leader.**
- **Initiatives through WRAP and WWF have developed measurement methodologies for measuring food waste on farms, which already being used by companies like G's Fresh – these could be perfected by 2024 for 2025 reporting**

# OTHER POLICY POSITIONS

## **OTHER POLICY POSITIONS**

- **Include franchises – to ensure broader coverage**
- **Report food surplus directed to redistribution charities – to distinguish from prevention**
- **Rather than charge all businesses a flat fee to cover costs, charge large businesses and structurally powerful businesses like supermarkets a higher levy, to account for their policies causing more waste. Proceeds from this fee could help support medium-sized businesses and primary producers establish measurement systems.**

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**THANK YOU!**

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