

MAKE FOOD WASTE COUNT

POLICY BRIEFING: THE CASE FOR MANDATORY FOOD WASTE REPORTING

FEED
BACK



Why food waste matters

An estimated 40% of food is wasted globally¹, with huge global impacts:

- Causes an estimated 8-10% of global emissions²
- Uses an estimated 28% of the world's agricultural land area, larger than China and India combined³, land which could help feed the nearly 1 billion people affected by hunger globally⁴.
- Costs an estimated \$1 trillion in economic losses per year⁵.

An estimated 10.4 to 13 million tonnes of food are wasted in the UK annually⁶ - equivalent to approximately 26-33% of the UK's 40 million tonnes of food imports per year⁷. UK food waste causes an estimated 36 million tonnes CO₂eq in emissions domestically and overseas⁸, costs businesses and citizens approximately £19 billion⁹, and UK on-farm food waste alone is estimated to use an area of agricultural land half the size of Wales¹⁰ - land which could be used to help sustainably feed the UK and restore nature to address the biodiversity and climate crises.

A Life Cycle Assessment from the University of Bangor and Feedback estimated that reducing UK food waste by 50% from farm to fork¹¹ could result in:

- Direct emissions savings of approximately 13.6 million tonnes CO₂e¹².
- Approximately 0.8 million hectares of cropland freed up domestically and overseas¹³, which Feedback estimate could produce enough potatoes and peas to feed 28% of the UK population with all the calories they need all year round¹⁴.
- Approximately 3 million hectares of grassland freed up domestically and overseas¹⁵ - which could be used for significant nature restoration to restore biodiversity and sequester carbon.

The case for: Mandatory food waste reporting, essential to halving food waste by 2030

There is broad consensus that mandatory food waste reporting is essential to halving UK food waste by 2030. WRAP, who oversee the UK's voluntary food waste commitments, have said that "mandatory food surplus and waste reporting are essential if SDG 12.3 is to be achieved"¹⁶. The House of Commons EFRA committee found that "a voluntary approach is inadequate" and advised that the government should "require food businesses over a particular size to publicly report data on food waste"¹⁷. Tesco have said "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", calling on the government to introduce this "urgently"¹⁸, and more recently said it remains "critical"¹⁹. More recently WWF and Tesco combined to call for "mandatory reporting of on-farm food waste, specifically for medium and large farm businesses"²⁰.

Mandatory reporting also has popular support from the public, businesses and civil society. Out of a total 3,852 responses to the government's Consultation on improved reporting of food waste by large food businesses in England²¹, we know that at least 3,728 were submissions via Feedback's email action calling for mandatory food waste reporting for large and medium-sized businesses, including at primary production level, for reporting by 2024²².

There is currently a damaging lack of data on UK food waste, which makes it impossible to accurately assess the scale of the problem and make progress in tackling food waste. We simply do not know how much food is being wasted – particularly:

- No reliable UK-wide data has ever been collected for food wasted at primary production beyond estimates²³ - lack of a baseline locks primary production out of UK food waste reduction targets.
- No reliable data on UK-wide hospitality and food service food waste has been collected since 2011²⁴. WRAP only have food waste data covering approx. 10% of food waste in this sector²⁵.

The UK government's claims to be a global leader in food waste are absurd when we don't even know how much food waste exists, let alone how much has been reduced in these key sectors.

There is over a decade of evidence to show that voluntary food waste reporting has failed. 70% of Food Waste Reduction Roadmap signatories were still not reporting data publicly in 2022²⁶, showing even the businesses most engaged by WRAP are resistant to voluntarily publishing data without a level playing field or penalties for non-compliance. WRAP have previously called the low rate of public reporting by businesses "disappointing"²⁷. The government's own impact assessment states that an "enhanced voluntary agreement" being considered as an alternative to mandatory food waste reporting, which would involve simply hiring more staff to do some more engagement to encourage businesses to report voluntarily, would be "more expensive" than mandatory food waste reporting for large and medium sized businesses "with significantly less food waste being targeted"²⁸.

This lack of data is having a damaging effect on the UK's reduction of food waste in businesses. Based on the patchy data that is available, extremely limited progress has been achieved in reducing food waste in UK businesses over the past decade. According to WRAP, retail, manufacturing and hospitality and food service food businesses collectively only reduced their food waste from 3.11 million tonnes in 2011 to 2.88 million tonnes in 2018, a 7% decrease overall or roughly 1% decrease per year²⁹. This excludes the 3.6 million tonnes of food waste and surplus estimates to occur at primary production, for which there are no accurate figures on scale or progress – meaning overall reductions for food waste in UK businesses could have been closer to 0.5% per year during this period. WRAP have since estimated that between 2018-21 total food waste for producers and manufacturers had *increased* by 9% (an additional 100,000 tonnes) and that "food waste as a percentage of total food handled has increased from 3% to 3.8%"³⁰.

A significant proportion of UK food waste occurs in businesses. Of the estimated 10.4 to 13 million tonnes of food wasted in the UK annually, approximately 37-49% of the UK's food waste occurs in UK businesses in primary production, manufacturing, retail and hospitality food service, equal to 3.8 to 6.4 million tonnes³¹. Factoring in food surplus too (much of which is human-edible food fed to animal feed), UK businesses cause about 7.24 million tonnes out of the UK's total 14.1 million tonnes of food waste and surplus – about 51%³².

The case for: Inclusion of primary production

It is essential that primary production is included in mandatory food waste reporting. Primary production is currently excluded from Courtauld due to lack of an accurate baseline, preventing meaningful action towards SDG 12.3 – mandatory reporting would rectify this. WRAP estimate that 7.2% of production is wasted in UK primary production (3.6 million tonnes of food waste and surplus – as much as wasted in the manufacturing, retail and hospitality and food service sectors combined), costing UK farmers £1.2 billion in potential lost revenue³³. A more recent study by WWF estimated that 3.3 million tonnes of food is wasted on UK farm per year, of which 2.9 million tonnes is edible food – this causes 6 MtCO₂e in emissions (equal to approx. 10% of UK agricultural emissions), uses land equivalent to almost half the size of Wales to produce (9.600km²), and is worth an estimated £1.8 billion³⁴.

Excluding farmers from mandatory food waste reporting will prolong these losses, and create perverse incentives to disappear food waste from official statistics by pushing it onto farmers via unfair trading practices, harming farmers and accurate data collection. Developing a methodology by 2024 ready for reporting by 2025 is achievable. WRAP have already created a Grower Guidance Field Record Sheet & Reporting Template³⁵. The SISC Food Loss Metric also provides a detailed model for measuring and reporting food waste on farm³⁶. WWF are also in the process of refining a new tool for UK on-farm food waste measurement, expected to be ready by Q1 2024³⁷, and have outlined a roadmap to prepare medium and large-sized farms for mandatory reporting by 2024 (alongside voluntary measurement and reporting by smaller farmers)³⁸. Several primary producers in the UK are already reporting their food waste – including G's Fresh, Vitacress Herbs and Glinwell plc³⁹.

WRAP have also estimated that UK farmers could achieve a potential 20% increase in profits by reducing surplus and wasted food if all farmers achieved best in class performance, and that improvements in data and measurement are key to waste reduction⁴⁰. Profit increases from reducing waste are even higher in some sectors – 33% for carrots, 24% for eggs and 23% for potatoes⁴¹. At its growing, packing and processing sites, G's Fresh achieved 43% food waste reduction between 2017/18 and 2019/20 after it started measuring and reporting its food waste, reducing over 20,000 tonnes food waste annually⁴².

Many farming organisations support mandatory food waste reporting for medium and large-sized farms – including the Nature Friendly Farming Network, the Landworkers' Alliance, CSA Network UK and Linking Environment and Farming (LEAF).

Policies like cosmetic standards, unfair trading practices like last-minute order cancellations, and contracts which incentivise overproduction can all affect supermarket suppliers. Measuring and reporting food waste data for primary production can help raise awareness of these issues with the public, policy makers and retailers – helping raise pressure for policy changes which enable more of primary producers' produce to make it to market, boosting farmer income. For example, many supermarkets launched wonky veg ranges in reaction to coverage of wonky veg rejections on primetime TV shows⁴³, though more needs to be done. WRAP's research also found that measuring food waste often reveals higher levels of wasted food than farmers realised⁴⁴ - helping farmers realise the scale of food waste, so this can be rectified.



Popular support for mandatory food waste reporting

99% of respondents to the government's consultation supported mandatory food waste reporting for large and medium-sized businesses⁴⁵. 99% of the consultation respondents supported the inclusion of medium-sized businesses in mandatory reporting, and 98% of the consultation respondents supported the inclusion of primary production food waste⁴⁶. The measure also had the support of the majority of businesses. 79% of retailers, 73% of the hospitality and 67% of primary producers responding to the consultation backed the introduction of mandatory food waste reporting⁴⁷. Manufacturers were about evenly split by the proposal. Tesco have said: "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"⁴⁸ and more recently said it remains "critical"⁴⁹. Reacting to news of the law being scrapped, Waitrose said they were "disappointed"⁵⁰, and Ocado also said they'd be been supportive of mandatory reporting⁵¹.

The case for: Inclusion of both large and medium-sized businesses

It is essential that medium-sized businesses be included in mandatory food waste reporting. Otherwise, coverage will be unacceptably limited, particularly in sectors which currently suffer from the lowest food waste reporting – food service and primary production. The government's impact assessment estimates that only 47% of hospitality and food service food waste occurs in large food businesses, inadequate coverage; including medium-sized businesses in mandatory reporting would boost this to 60%⁵². Since no medium-sized businesses currently report under the Food Waste Reduction Roadmap, their food waste may be higher – a valuable-to-fill data gap. For primary production, an even lower proportion of the sector would count as large food businesses, whereas including medium-sized businesses would significantly boost coverage. Cost-saving calculations for mandatory food waste reporting by large and medium-sized businesses show that measurement would be economical, resulting in considerable net savings.

We use the government's definition⁵³, which states that businesses will be considered large if at least two of the following criteria are satisfied: 1) Turnover of £36m or more, 2) Balance sheet of £18m or more, or 3) 250 employees or more. A business will be considered medium if at least two of the following criteria are satisfied: 1) between 50 and 249 employees, 2) Annual turnover between £10.2 million and £35.9 million, or 3) Annual balance sheet total between £5.1 million and £17.9 million.

Cost-saving calculations of mandatory food waste reporting

The government's impact assessment found that measurement of food waste by large and medium sized businesses (Option 3) would only cost £19.18/tonne of food waste targeted⁵⁴ – extremely good value compared to the savings of £1,200 to £3,100 per tonne of food waste reduced⁵⁵. The impact assessment states that only 8,818 tonnes of food waste reduction would offset the costs of Option 3 over 10 years⁵⁶ – this is only 0.5% of food waste estimated in England's large and medium-sized businesses. 0.5% reductions over 10 years seem extremely feasible. Other studies have found that costs would be outweighed significantly by savings: a study of 1,200 companies across 17 countries found that 99% reported positive return on investment in food waste reduction, with an average cost-benefit ratio of 14:1⁵⁷.

Based on figures in the government's impact assessment, Feedback have calculated that if mandatory food waste reporting in England led to just a 1% reduction in food waste in large and medium sized food businesses, this would result in net savings to food businesses of an estimated £24.4 million per year. These net savings would rise to an estimated £167 million a year with 5% reductions in food waste, and an estimated £703 million a year with a still relatively conservative 20% reduction in food waste – with potential savings of £120,000 to £460,000 per business annually. For more info, see Annex 1.

The government had defended scrapping the legislation by pointing to the costs to businesses of implementing the regulations potentially driving food inflation, saying "overall burden of regulation on businesses and is seeking to avoid measures that would drive inflation while cost of living challenges remain an issue for many consumers"⁵⁸. However, the government's own impact assessment found that food waste currently costs the UK £19 billion, and any costs from measurement and reporting of food waste would be offset by only 0.25% reductions in food waste, a similar conclusion to Feedback's analysis above. The impact assessment estimates that food waste measurement costs only an estimated £19 per tonne measured, compared to an average £1,189- £3,099 savings per tonne food waste reduced.

The case for: Urgent delivery of mandatory food waste reporting

Mandatory food waste reporting has already been significantly delayed. The consultation on mandatory food waste reporting was originally promised in mid-2019⁵⁹ - and was delivered a full three years late⁶⁰. This has wasted valuable time during which mandatory food waste reporting could have been introduced, with time ticking for the 2030 deadline for halving food waste under Sustainable Development Goal 12.3. Although the consultation closed in September 2022, the response was published nearly a year later in July 2023. Shamefully, the government responded to the consultation by scrapping plans for mandatory reporting, and saying it will continue voluntary reporting until at least mid-2025⁶¹. Civil society has patiently waited for the government to act, as again and again the process has been delayed – but now the time for delay is over, we need action now to tackle the urgency of the climate crisis.

The government had originally proposed food waste beginning from 2025, with measurement beginning in 2024⁶². There must be no further delay to this timeframe, which already leaves only 5 years until the deadline to meet SDG 12.3 to halve food waste by 2030. Legislation should therefore require that medium and large sized businesses in the retail, manufacturing, primary production and hospitality and food service sectors begin measurement from 2024, so that public reporting of this data can begin from 2025 at the latest. Companies who already have food waste data but have been sharing this in confidence with WRAP (in 2022, 221 businesses were reporting data for Food Waste Reduction Roadmap, but most privately⁶³) should be required to publish data immediately in 2024.

Feedback had previously recommended that most businesses report by 2024, but since the government has significantly delayed the consultation (and its response) we unfortunately believe that reporting will not be possible until 2025 for most businesses. We originally proposed that primary production sector be given an extra year until 2025 to give adequate time to develop a standardised methodology for this sector, which involves some extra complications – we stick by 2025 as a beginning for primary production businesses reporting data, particularly because WWF's Hidden Waste roadmap anticipates that the methodology and systems for measuring on-farm food waste will be ready by 2024⁶⁴.

Addendum: Mandatory targets for food waste prevention

Finally, it should be noted that in 2018, the government also promised to consult on “legal powers to introduce mandatory targets for food waste prevention”⁶⁵. This promise appears to have been either scrapped or kicked into the long grass until years after mandatory food waste reporting is implemented. This is unacceptable, and the government must also urgently deliver this consultation on mandatory food waste reduction targets.

Appendix 1: Food waste cost-saving calculations

| Sector | HAFS | Retail | Manufacturing | Total | Source |
|---|--------------|--------------|---------------|---------------------|---|
| Total food wasted per year in sector by large and medium food businesses (tonnes) | 549,535 | 226,378 | 1,131,864 | 1,907,777 | Table 6, impact assessment ⁶⁶ |
| Number of large and medium businesses per sector in England | 2601 | 301 | 789 | | Table 2, impact assessment ⁶⁷ |
| Cost saved per tonne food waste reduced | £2,775 | £3,099 | £1,189 | | Table 17, impact assessment ⁶⁸ |
| 1% reduction in food waste (tonnes) | 5,495 | 2,264 | 11,319 | 19,078 | |
| Est. savings of 1% food waste (£) | £15,249,596 | £7,015,454 | £13,457,863 | £35,722,913 | |
| Est. net savings of 1% food waste minus £11.3 million annual measurement costs (£) | | | | £24,422,913 | |
| 5% reduction in food waste (tonnes) | 27,477 | 11,319 | 56,593 | 95,389 | |
| Est. savings of 5% food waste (£) | £76,247,981 | £35,077,271 | £67,289,315 | £178,614,567 | |
| Est. savings of 5% food waste minus £11.3 million annual measurement costs (£) | | | | £167,314,567 | |
| 20% reduction in food waste (tonnes) | 109,907 | 45,276 | 226,373 | 381,555 | |
| Est. savings of 20% food waste (£) | £304,991,925 | £140,309,084 | £269,157,259 | £714,458,269 | |
| Est. savings of 20% food waste minus £11.3 million annual measurement costs (£) | | | | £703,158,269 | |
| Estimated savings per business with 20% reductions in food waste (£) | £117,259 | £466,143 | £341,137 | | |

NOTE: Where sources are not provided, figures are calculated by Feedback on the basis of the figures in the first three rows sourced from the government's impact assessment.

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