



Department  
for Environment  
Food & Rural Affairs

# Summary of responses and government response

Improved food waste reporting by large food  
businesses in England

Date: July 2023

We are the Department for Environment, Food and Rural Affairs. We are responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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## Contents

Summary of responses and government response .....	1
Improved food waste reporting by large food businesses in England .....	1
Introduction .....	4
Executive summary and next steps .....	5
Scope of the consultation .....	5
Respondents .....	5
Executive summary of responses on key proposals .....	6
Analysis of responses .....	7
Government Response .....	7
Summary of responses .....	9
The case for action .....	9
UK Food Waste Reduction Roadmap (FWRR) .....	12
Scope – Size of business .....	18
Scope - Types of business .....	24
Material .....	39
Proposals for reporting process .....	44
Timeline for introduction under Option 2 .....	52
Analysis on the impact of the reporting requirements .....	54
Enforcement Action .....	66
Appendix A – Receipt and analysis of responses .....	69
Appendix B – List of respondents .....	72

# Introduction

The government wants to leave the environment in a better condition for the next generation. The [25 Year Environment Plan](#), the [Clean Growth Strategy](#) and the [Resources and Waste Strategy for England](#) (RWS) outlined the steps that will be taken 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.

Food waste is a financial and environmental burden. Unnecessary food waste is inefficient, pushing up the price of food for consumers and businesses. Reducing food waste can help food businesses cut costs and identify food that could be redistributed to the most vulnerable. Furthermore, globally, [one third of edible food produced for human consumption is lost or wasted](#). A fifth of territorial UK greenhouse gas emissions are associated with food and drink, mostly created during production (agriculture and manufacturing). These are needless emissions if the food and drink are subsequently wasted.

This is why the government has funded a holistic programme to reduce food waste since 2005, administered by the Waste and Resources Action Programme (WRAP). We have seen good progress with the voluntary approach to date with 221 businesses measuring and reporting food waste in 2022. WRAP's [Food Waste Reduction Roadmap Progress Report 2021](#) reports that businesses measuring and reporting data year-on-year collectively saved 251,000 tonnes of food from going to waste in 2021, worth £365 million.

On 13 June 2022 the government's Food Strategy announced the launch of a consultation on improved food waste reporting by large food businesses in England. This document provides the government's response and summary of responses to that consultation. The response considers the proposals in the consultation in the context of the current pressures on the cost of living and the need to avoid measures which would drive food price inflation.

# Executive summary and next steps

## Scope of the consultation

The consultation was open to all to respond and sought views and evidence on:

- preferred option for improving food waste reporting
- size and type of business in scope
- material in scope
- reporting process
- compliance and enforcement

## Respondents

In total 3,851 respondents participated in this consultation. 105 responded via the online survey on Citizen Space and the remaining 3,746 responded via email.

Of the total, 3,728 were individuals participating in a campaign organised by Feedback, a non-governmental organisation (NGO) who campaign to improve the food system based in London. Responses received by individuals participating in the Feedback campaign were all identical.

Besides the 3,728 responses from individuals participating in the Feedback campaign, 123 responses were received from other respondents. 2 other lots of identical responses were submitted for this consultation. One was led by the Sustainable Restaurant Association (SRA), which produced 6 identical responses from hospitality or food service providers. Another produced 5 identical responses from individuals, but the organiser is unknown. These responses have been included in the analysis with all other responses.

A breakdown of the respondents (excluding those from the Feedback campaign) is provided in table 1. Appendix A – Receipt and analysis of responses includes our approach for designating organisations to these categories of respondent types. A list of organisations who participated in this consultation is provided in . This excludes individuals who responded and respondents who requested anonymity.

**Table 1. Breakdown of respondents participating in the consultation (excluding those who responded in line with the Feedback campaign)**

<b>Respondent type</b>	<b>Number of respondents</b>	<b>Percentage of total responses</b>
<b>Individuals</b>	27	22%
<b>Hospitality</b>	22	18%
<b>Charities and social enterprise</b>	21	17%
<b>Manufacturing</b>	20	16%
<b>Retailers</b>	14	11%
<b>Others</b>	11	9%
<b>Primary production business</b>	6	5%
<b>Local government</b>	2	2%
<b>TOTAL</b>	123	100%

## **Executive summary of responses on key proposals**

Overall, respondents were generally positive regarding government’s intent to ensure that more food businesses are engaged and taking action to reduce food waste. The consultation document proposed options for how to go about ensuring this action, outlined in the section ‘The case for action’. These options underpin many of the questions in the rest of the consultation document.

The predominant view from respondents (80%) was in favour of Option 2, requiring food waste measurement and reporting for large food businesses. This view was primarily shared amongst individuals as well as respondents from the charities and social enterprises, hospitality and retail sectors, signalling general widespread support amongst respondents for Option 2. Indeed, many businesses responding to this consultation indicated that they already collect data on their food surplus and waste.

Another of the key elements of this consultation was understanding whether medium-sized business (MSB) should be outside the scope for any regulations. [Advice from the Waste and Resources Action Programme \(WRAP\)](#) states that food waste reporting regulations are less suited to MSBs at this time, and in many cases, it may be possible to achieve the majority of intended benefits even if MSBs are exempted. Despite this advice, most respondents (64%) did not agree that MSBs should be outside the scope for any regulations (Question 20). However, it must be noted that very few MSBs participated in this consultation (only 4% of respondents responding to Question 18 qualified as MSBs, compared to 39% of respondents which qualified as large-sized businesses in Question 15). The majority of respondents who thought that MSBs should be in scope for any regulation represented views from individuals, and organisations in the hospitality, charity and social enterprise sectors. Of the 5 MSBs that provided responses, 3 also thought that they should be in scope of regulations, 1 was not sure, and 1 agreed that they should not be in scope.

## Analysis of responses

Our approach to the analysis of responses is described in Appendix A. The report uses the following terminology to describe the frequency of responses to individual questions:

- predominant: more than 80% of respondents
- majority: 50 to 80% of respondents
- mixed or range: when there is no majority
- large minority: 20 to 50% of respondents
- small or some or a number: less than 20% of respondents

The responses provided by individuals participating in the Feedback campaign were analysed and reported on separately due to the volume of their response compared to the rest of the respondents. The individuals participating in the Feedback campaign did not provide responses for all questions. Where they have provided a response, we have summarised their response in the text (for both quantitative (closed) and qualitative (open-ended questions)). If there is no mention of the Feedback campaign in a particular question, it is because they have not provided a response.

## Government Response

We are very grateful for the interest we have had in this consultation and want to thank all who responded.

We know the voluntary approach to food waste reporting has been broadly successful to date with almost half of large food businesses in England measuring and reporting voluntarily in 2022. WRAP's [Food Waste Reduction Roadmap Progress Report 2021](#) reports that 140 businesses with year-on-year data made a 17% overall reduction in food

waste in 2021, worth £365 million. These businesses also reported increased efficiency with a 13 to 15% reduction in waste per tonne of food handled.

However, as identified at consultation, the number of businesses voluntarily reporting food waste has stalled and is expected to plateau. That is why the government is considering options to increase the number of businesses reporting, in order to incentivise action from businesses to make reductions to food waste in their operations.

We recognise and welcome that 99% of respondents (80% when removing campaign responses) were in support of Option 2, a regulatory approach to food waste reporting for large food businesses in England being considered by the government. We recognise that those respondents were in support of Option 2 because they consider a regulatory approach to lead to an increase in the number of businesses reporting and reducing food waste, levelling the playing field and bringing financial savings for business and environmental benefits, including minimising the resources used to producing food and reducing greenhouse gas emissions from waste management.

However, we also note that only 39% of respondents to the consultation identified as a large business. This means that the majority of respondents would not be directly impacted by the regulatory policy option outlined in the consultation. We therefore acknowledge that, although the majority of respondents indicated support for Option 2, a regulatory approach to food waste reporting, most of those responding would not be required to measure and report food waste themselves.

Furthermore, there are costs to large businesses associated with introducing regulation for food waste reporting. Although any action to reduce food waste taken as a result of regulation would bring financial savings to business, there are set up and operational financial costs associated with complying with regulation. In our [impact assessment](#) we estimate the total average annual reporting costs to business to be £5.3 million (compared with £0.3 million for Option 1). This equates to up to £32,362 per year for a business new to food waste reporting. Total cost across the 12-year appraisal period is estimated at £11.7m for Option 1 against £63.8m for Option 2. There are also significant costs to the public sector involved in setting up the regulations. These are estimated to be over £1 million across 2023 and 2024 and 2024 and 2025. Option 1 as proposed in the IA would result in similar costs to the public sector (£1.2m per annum) and this was modelled to continue as the annual cost for the option in the IA.

As Option 2 has much greater total costs to business and the public sector than Option 1, the government must be assured that regulation is the optimal option. The government is sensitive to the 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. Therefore, the government currently considers the costs of introducing regulation for food waste reporting to be too high. If the savings from such reporting outweigh the costs, this will still provide a strong commercial incentive for firms to reduce their food waste. After careful consideration of the responses to the consultation the



government has decided that a regulatory approach is not suitable at this time, especially when any additional costs may be passed on to consumers.

The government will instead be looking at options to improve the number of food businesses reporting through a voluntary approach.

The voluntary approach will remain in place until mid-2025 at a minimum at which point a review will be undertaken. Subsequently, and in order to provide businesses with the certainty they need, any changes to this approach will be made after a minimum of 12 months following that review in mid-2025 or later.

## Summary of responses

The first 6 questions of the consultation capture details of the respondent (such as name and organisation). Questions gathering their views on the consultation topic start at Question 7, under 'the case for action'.

### The case for action

The [consultation document](#) presented the policy options for consideration amongst respondents. These were also explored further in the corresponding [impact assessment](#). The options underpin the discussion in the remaining questions in this summary document, and so have been presented here as well to aid in the understanding and analysis.

The policy options presented were:

- a. **Do-nothing option** – this would mean maintaining current measures
- b. **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
- c. **Option 2** - require food waste measurement and reporting for large food businesses

### Q7. Do you have a preferred option?

The [Impact Assessment](#) shows more information in relation to the options.

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

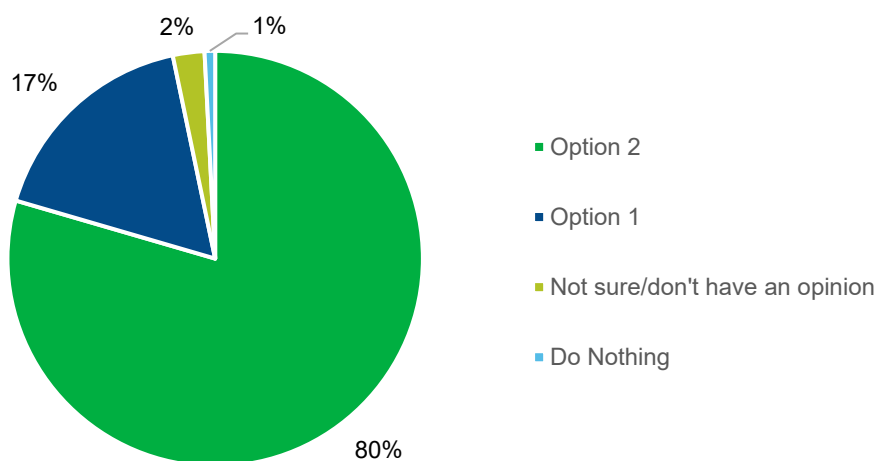
A total of 3,850 responses were received for Question 7.

Of these, 3,728 were from individuals participating in the Feedback campaign. The Feedback campaign response responded that Option 2 is the preferred option.

From the remaining 122 responses:

- A majority (80%,97) of the responses chose Option 2
- 17% (21) preferred Option 1
- 2% (3) were not sure or did not have an opinion
- 1% (1) responded 'Do nothing'

**Figure 1. Percentage of 122 responses to Question 7 (excluding the Feedback campaign responses)**



**Table 2. Breakdown of respondents responding to Question 7**

Respondent type	Option 1	Option 2	Do nothing	Not sure or don't have an opinion	Total number of respondents
Individuals	1	25	0	0	26
Hospitality	5	16	0	1	22
Charities and social enterprise	2	19	0	0	21

Respondent type	Option 1	Option 2	Do nothing	Not sure or don't have an opinion	Total number of respondents
Manufacturing	8	9	1	2	20
Retailers	3	11	0	0	14
Others	0	11	0	0	11
Primary production business	2	4	0	0	6
Local government	0	2	0	0	2
<b>Total</b>	<b>21</b>	<b>97</b>	<b>1</b>	<b>3</b>	<b>122</b>

The majority of respondent types chose 'Option 2' as their preferred choice, except for those representing manufacturing where the responses were split between 'Option 2' (9 responses) and 'Option 1' (8 responses) (Table 2).

### **Q8. How do you think the proposals under Option 1 (enhance current voluntary approach) could be improved? (200 words max)**

A total of 3,823 responses were received for Question 8.

Of these, 3,728 were from the Feedback campaign, and 95 responses were provided by other respondents.

The majority of respondents used this question to clarify that food waste reporting must be made mandatory, preferring Option 2 (with certain exemptions). Comments noted this was to ensure fairness, to enable consistent and robust reporting across businesses and sectors, as well as specifying that implementation within England is aligned with the Scotland, Wales and Northern Ireland.

It was stated that legislation and regulation will also ensure transparency and accountability. One respondent from the hospitality sector stated: "Regulation is necessary to remove the fear businesses have about being a 'first-mover' and risking negative publicity, by providing a level playing field; ensuring transparency, accountability."

A large minority of respondents expressed the inadequacy of Option 1 and that it 'will not spread mass adoption of food waste measurement.' Respondents in this group felt similarly to the above. However they qualified it further by stating they felt that a voluntary

approach is not enough and has been ineffective as there are currently low levels of business reporting.

The Feedback Campaign response provided 3,728 responses to this question. Their response strongly opposed Option 1. They stated that the government should instead deliver on an alternative which includes both large and medium sized businesses (included in impact assessment, but not taken forward in the consultation) and introduce legally binding food waste reporting for both large and medium sized businesses. The Feedback campaign response stated that “A decade of failed voluntary reported [sic] shows that a legal requirement is needed to break the current deadlock.”

## **UK Food Waste Reduction Roadmap (FWRR)**

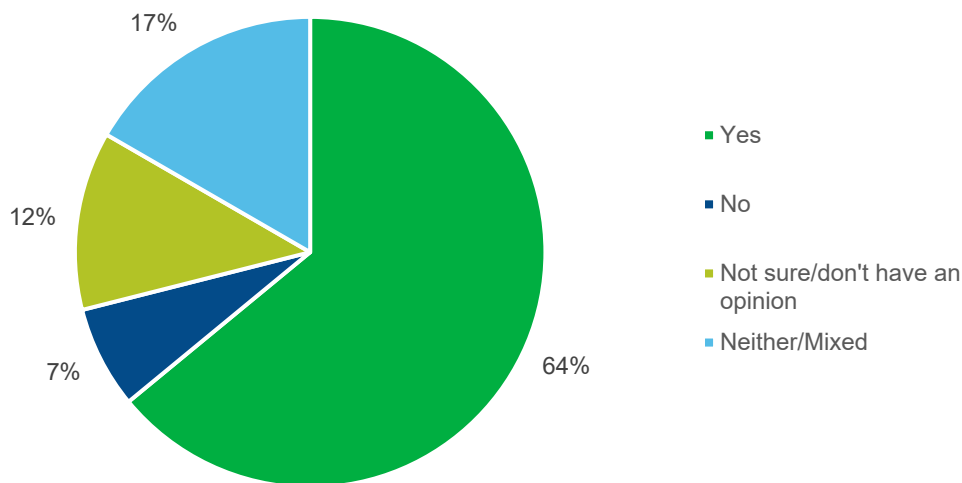
**Q9. Do you think reporting should be based on the FWRR including use of a reporting template (similar to the one at Annex A)?**

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

A total of 114 responses were received for Question 9. 3,735 did not provide a response to this question (such as 'Not Answered' or blank responses). Of these, 3,728 were from the Feedback campaign.

The figure 2 chart shows the split in responses from the 114 responses received.

**Figure 2. Percentage of 114 responses to Question 9 (excluding the Feedback campaign responses)**



A majority (64%, 73) agreed that reporting should be based on the FWRR including use of a reporting template. 17% (19) were mixed in their views, 12% (14) were not sure or did not have an opinion, and 7% (8) responded 'No', they did not believe that reporting should be based on the FWRR.

**Table 3. Breakdown of respondents responding to Question 9**

Respondent type	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Hospitality	18	0	1	3	22
Individuals	10	3	1	7	21
Charities and social enterprise	9	8	2	1	20
Manufacturing	18	1	0	0	19
Retailers	11	3	0	0	14
Others	5	2	3	1	11

Respondent type	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Primary production business	1	2	1	1	5
Local government	1	0	0	1	2
<b>Total</b>	<b>73</b>	<b>19</b>	<b>8</b>	<b>14</b>	<b>114</b>

Most respondent types agreed that reporting should be based on the FWRR including use of a reporting template, except for charities and social enterprises who were split between agreeing (9) and 'neither/mixed' (8) and primary production businesses who did not have a clear preference.

**Q10. Please briefly state your reasons for your response. Where available, please share evidence to support your view.**

Of the 114 people providing responses to Q9, 96 provided further reasoning to support their response. The Feedback Campaign response did not provide a response to this question, as they did not provide an answer in Q9.

Of those responding 'Yes' (74), several key themes emerged. These are described in this document.

A large minority were supportive of reporting being based on the FWRR, including the use of a reporting template. This was largely because it would align with existing reporting requirements under the FWRR, thereby offering a consistent approach that is already well established. The respondents stated that the template is familiar for many businesses already voluntarily reporting food waste, and thus would offer consistency and comparability.

Some respondents selecting 'Yes' for Question 9 were generally supportive of using the FWRR template but suggested that further detail and more granularity be required. Firstly, they suggested the [Data Capture Sheet](#) would benefit from including alternative metrics (such as greenhouse gas emissions) alongside the use of weight-based metrics. This group of responses also stressed the importance of definitions such as edible vs. inedible food waste.

In addition, specific comments focused on how the 'destination' of food waste is reported. These comments included:

- removing the option to say 'not known' for the destination of food waste
- having the destinations shown in Annex A of the [consultation document](#) align with the government's waste hierarchy such as incorporating recycling into the destination list
- for hospitality and food sector businesses, some destinations are out of scope (for food safety reasons) and so should be out of scope of reporting as well

Of those responding, 'No', a majority stated that the template could be more detailed. For example, optional reporting on tonnes or percentage of food waste broken down by different food product types to provide greater granularity where possible. This group had similar reservations regarding the way destinations were reported as those expressed by the group responding 'Yes', outlined in bullets above. Some also stated anaerobic digestion should be listed as a destination in its own right.

A large minority expressed the sentiment that the template should be adapted for primary producers, similar to WRAP's [Grower Guidance Field Record Sheet and Reporting Template](#)

Of those that were mixed in their views, a large minority also believed that more granularity of data was needed in order to achieve reductions and track environmental impacts of food waste. Several respondents also believed that the template should be adapted for primary producers (for example to allow for reporting where vegetables remain unharvested or are plough-in).

The reasoning provided in responses for this question were more or less aligned, irrespective of their multiple-choice option selected in Q9.

### **Q11. Does your business currently measure its food surplus and waste?**

- **Yes**
- **No**
- **Only food surplus**
- **Only food waste**
- **Not sure**

A total of 64 responses were received for Question 11. 3,787 respondents did not provide a response to this question (that is 'Not Answered' or blank responses). 3,728 of these were from the Feedback Campaign.

Of the 64 responses:

- a majority (48) responded 'Yes' signalling that their businesses do currently measure food surplus and food waste
- 10 responded 'No'
- 1 responded 'Only food surplus'

- 3 responded 'Only food waste'
- 2 were not sure

Most respondent types responded 'Yes'. The majority of respondents from charities and social enterprises responded 'No' (4).

## **Q12. Did your business require direct support to implement the guidelines in the FWRR?**

- **Yes, from WRAP**
- **Yes, from another organisation. Please state which organisation**
- **No**

A total of 58 responses were received for Question 12. 3,800 respondents did not provide a response to this question (that is 'Not Answered' or blank responses). 3,728 of these were from the Feedback Campaign.

Respondents were able to choose more than one option to indicate the support they received from WRAP or other organizations. In our analysis, we summed the number of times each selection was chosen.

24 respondents had support from WRAP to implement the guidelines in the FWRR. These were mainly from hospitality, manufacturing or retail.

A smaller group (12) responded that support was required from other organisations. Organisations mentioned included Anthesis, Green Eco Technologies, Winnow, and Neighbourly.

22 responded 'No', meaning they did not require direct support.

## **Q13. How long did it take your business to establish a baseline for food waste measurement?**

- **Less than 1 year**
- **Between 1 and 2 years**
- **Between 2 and 3 years**
- **More than 3 years**

Of those businesses who already record food waste, a total of 37 responses were received for Question 13.

The majority of responses (19) said that their businesses took less than 1 year to establish a baseline for food waste measurement. 12 responded 'Between 1 and 2 years', 4 responded 'Between 2 and 3 years', and 2 responded 'More than 3 years' were required to establish a baseline.



Most respondents from manufacturing responded, 'less than 1 year' whilst respondents from hospitality and retailers were split between 'less than 1 year' and 'between 1 and 2 years'.

**Q14. How does your business report and/or publish food waste data?  
(Select one or more options)**

- Report to WRAP
- Report to a different body
- Publicly publish data
- None of the above

A total of 71 responses were received for Question 14.

Respondents were able to choose more than one option to indicate how they report or publish their food waste data. In our analysis, we summed the number of times each selection was chosen.

Most (34) indicated that their business reports/publishes food waste data to WRAP. Of those responding 'Report to WRAP', a majority represented views from the manufacturing, hospitality and retail sectors.

A small group (7) indicated that they report to a different body, another 18 responded that they publicly publish their data, and some (12) responded 'None of above'. Of those responding 'Publicly publish data', there was a fairly even split between the manufacturing, hospitality, and retail sectors.

Table 4 shows the split in responses received for Question 14.

**Table 4. Breakdown of respondents responding to Question 14**

Respondent type	Report to WRAP	Report to a different body	Publicly publish data	None of the above	Total
Manufacturing	14	5	6	1	25
Hospitality	13	1	6	2	20
Retailers	6	0	6	3	12
Charities and social enterprises	0	0	0	3	3

Respondent type	Report to WRAP	Report to a different body	Publicly publish data	None of the above	Total
Primary production business	1	0	0	1	1
Others	0	1	0	2	1
<b>Total</b>	<b>34</b>	<b>7</b>	<b>18</b>	<b>12</b>	<b>71</b>

## Scope – Size of business

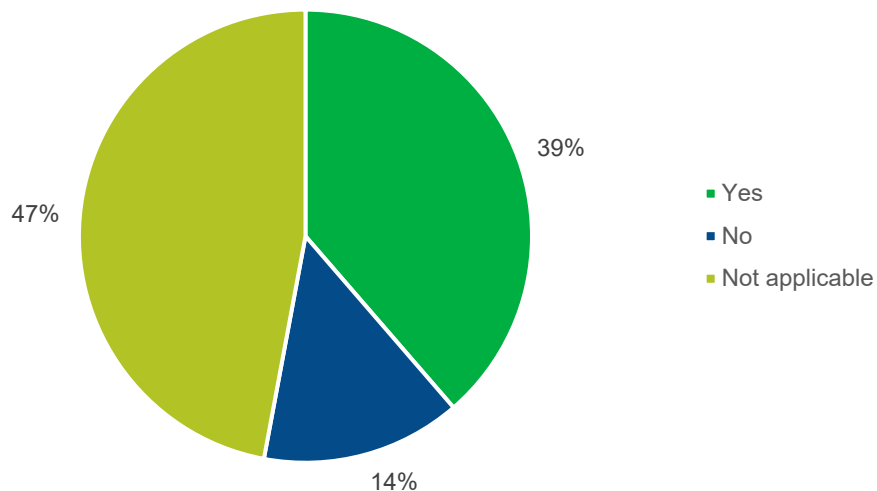
**Q15. Based on the criteria above, does your organisation or business qualify as a large-sized business? (If you are responding as an individual, please select not applicable)**

- Yes
- No
- Not applicable

A total of 3,847 responses were received for Question 15. Of these, 3,728 were from the Feedback campaign, and 119 were other respondents. Only 4 did not provide a response to this question.

The figure 3 chart shows the split in responses from all but the Feedback campaign who answered not applicable.

**Figure 3. Percentage of 119 responses to Question 15 (excluding the Feedback campaign responses)**



A large minority (39%, 46) responded ‘Yes’, that their organisation did qualify as a large-sized business. These respondents reflected the majority of businesses from hospitality, manufacturing, primary producers and retail sectors.

A small group (14%, 17) responded that their organisation did not qualify as a large-sized business. These were responses from charities, social enterprises and other businesses.

**Table 5. Breakdown of respondents responding to Question 15**

Respondent type	No	Yes	Total
Hospitality	2	18	20
Manufacturing	0	15	15
Retailers	3	9	12
Charities and social enterprise	6	1	7
Others	4	1	5
Primary production business	1	2	3
Individuals	1	0	1

Respondent type	No	Yes	Total
Total	17	46	63

**Q16. If you answered yes to question 15, how many premises does your business operate in England?**

Of the 46 people responding ‘Yes’ to Question 15, all 46 provided a response in Question 16.

The 22 organisations categorised as having between one and 49 premises in England were mainly manufacturers (14), with most responding that they had under 30 sites. One organisation (a manufacturer) had 40 sites, which was the highest number of premises for this group (1 to 49).

For the 15 organisations categorised as having over 1000 premises in England, these were from hospitality (11), retail organisations (3), and primary production business (1). These ranged from 1,000 to 4,300 premises, with most concentrated around the 1,300 to 2,300 range.

**Q17. If you do not agree with the definition of large businesses or the thresholds indicated under Option 2, please provide an alternative definition explaining why that is preferable. If possible, please also provide evidence of the source of the definition and number of food businesses that would be captured under the alternative definition. (200 words max)**

For this question, 25 responses were provided.

Most respondents did not directly answer Question 17, (to provide an alternative definition of large business and why it is preferable,) but instead used the opportunity to expand on which businesses should be included within the scope of Option 2 and why. These themes have been summarised to capture the overarching view of respondents:

- a majority of respondents used this space to agree with the definition of a large business
- a large minority, though a small number, did not provide an alternative definition; however, they believed that mandatory reporting should be expanded to include medium size business, small business, and eventually all business regardless of size.

It was stated that this expansion of scope should be conducted over a longer implementation period, with support, however large business should be prioritised as the immediate target. The reasoning for this view was that *'all food waste should be recycled'* and, once embedded, the reporting systems are manageable

**Q18. Based on the criteria above, does your organisation or business qualify as a medium-sized business? (If you are responding as an individual, please select not applicable)**

- Yes
- No
- Not applicable

A total of 119 responses were received for Question 18.

A majority (50%,59) responded 'Not applicable'. 46%(55) responded 'No', that is their organisation or business did not qualify as a medium-sized business. Only 4%(5) responded 'Yes', that their business did qualify as a medium-sized business. These were from hospitality (2), retail (1) and other (2).

**Q19. If you answered yes to question 18, how many premises does your business operate in England?**

Of the 119 number of people responding 'Yes' to Question 18, only 4 provided further reasoning in Question 19. 2 respondents (one from the hospitality sector and another from the retail sector) indicated that they operate 10 and 3 premises respectively in England. The remaining 2 respondents did not clearly indicate the number of premises that their business operates in England.

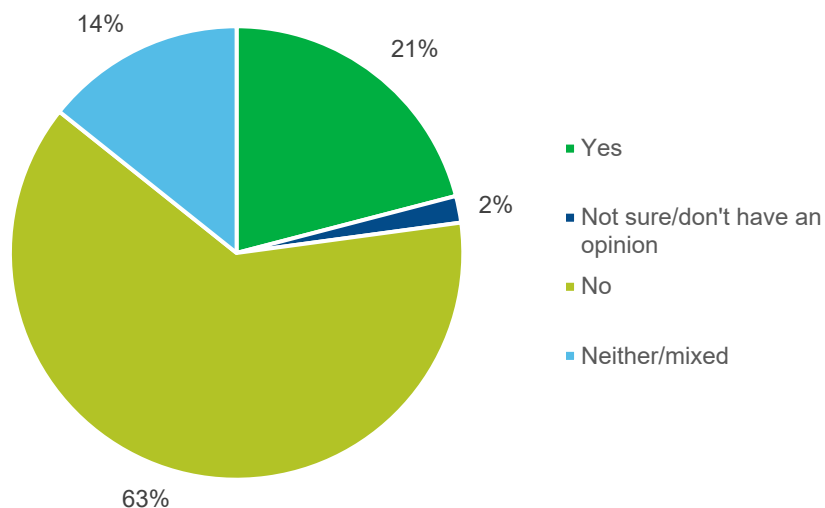
**Q20. Do you agree that medium-sized businesses should be outside the scope for any regulations?**

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

There was a total of 3,833 responses to Question 20. Of these, 3,728 were from the Feedback Campaign, and 105 were other respondents. 18 did not provide a response to this question (that is 'Not Answered' or blank responses).

The figure 4 chart shows the split in responses from the 105 other responses received.

**Figure 4. Percentage of 105 responses to Question 20 (excluding the Feedback campaign responses)**



A majority of respondents (63%,66) did not agree that medium-sized businesses should be outside the scope for any regulations.

21% (22) responded 'Yes', agreeing that medium-sized businesses should be outside the scope for any regulations. 14% (15) of were mixed in their views, and the remaining 2% (2) were not sure or did not have an opinion.

**Table 6. Breakdown of respondents responding to Question 20**

Respondent type	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Individuals	0	1	19	0	20
Charities and social enterprise	2	3	14	0	19
Hospitality	5	3	10	1	19
Manufacturing	8	4	4	0	16
Retailers	4	1	8	0	13
Others	2	1	6	1	10

Respondent type	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Primary production business	1	1	4	0	6
Local gov	0	1	1	0	2
<b>Grand Total</b>	<b>22</b>	<b>15</b>	<b>66</b>	<b>2</b>	<b>105</b>

The majority of all respondent types, except manufacturing, responded 'No'. The majority of the respondents representing manufacturing businesses said 'Yes'. The Feedback Campaign response (3,728 total responses) all responded 'No' to this question.

**Q21. Please briefly state your reasons for your response. Where available, please share evidence to support your view. (200 words max)**

Of the 105 respondents from Question 20, 95 provided further reasoning to support their response in Question 20.

Of those that responded 'No' (that medium-sized business should not be outside the scope for any regulations), several key themes emerged. These are summarised as follows:

A majority believed that:

- all food waste has an impact and therefore all businesses should be required to report on food waste, regardless of business size
- Data reporting should thus be mandatory for medium-sized businesses - this was felt mostly by individuals and respondents from hospitality, charities and social enterprise and retail sectors

A large minority shared a figure from the impact assessment that medium-sized businesses generate 14% of total food waste and failure to include them would represent a significant gap in reporting. This was felt mostly by individuals and respondents from the hospitality sector.

A large minority mentioned that medium size businesses should also measure food waste efficiently and cost-effectively as waste management is a fundamental part of managing a successful business in the food supply chain.

Of those that responded "Yes", several key themes emerged:

- a majority agreed with WRAP's findings presented in the [consultation document](#), which found that mandatory food waste reporting regulations are less suited to medium-sized businesses due to the financial consequences - this was felt mostly by individuals and respondents from the hospitality sector
- related to this view, a majority expressed that food waste reporting is a challenging task for medium-sized businesses due to a lack of adequate resources (such as infrastructure, staff, finance, skills) which would need to be improved to implement a well-functioning system
- a majority believed that medium-sized businesses should be encouraged to voluntarily measure and report on their waste in order to reduce the related climate impacts - this was felt mostly by individuals and respondents from the hospitality sector

The Feedback Campaign response provided 3,728 responses to this question. They said that medium-sized businesses must be included. Otherwise, coverage will be limited, particularly in sectors that currently suffer from the lowest food waste reporting – such as food service and primary production. According to Defra, including both large and medium-sized businesses would cost £19.18 per tonne of food waste targeted. This was identified by Feedback as 'extremely good value' and thus it was suggested that costs to include medium-sized businesses would be outweighed significantly by savings.

## Scope - Types of business

**Q22. Do you agree with the list of businesses which would be required to report under Option 2?**

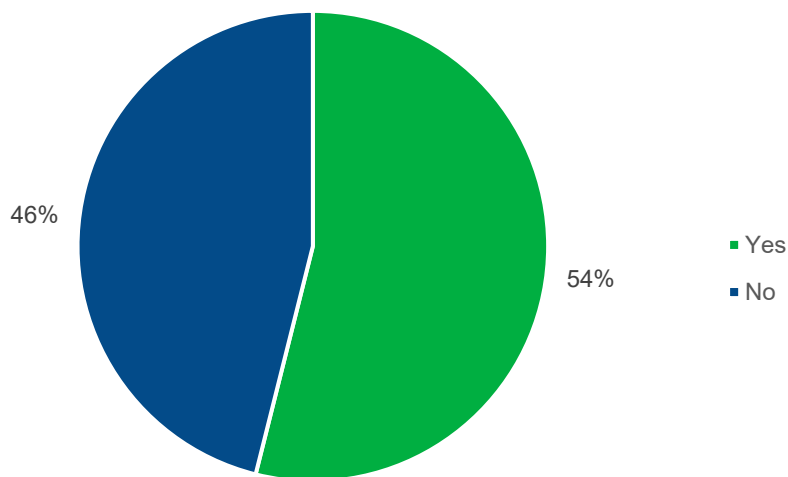
- Yes
- No. Please provide further detail of what changes you would make and why. (200 words max)

A total of 3,843 responses were received for Question 22. Of these, 3,728 were from the Feedback campaign, and 115 were other respondents.

The figure 5 chart shows the split in responses from all but the Feedback campaign; these have been counted separately due to the number of responses received.



**Figure 5. Percentage of 115 responses to Question 22 (excluding the Feedback campaign responses)**



A majority (54%, 62) agreed with the list of businesses which would be required to report under Option 2. All other respondents (46%, 53) responded 'No'- they did not agree with the list of businesses required to report under Option 2.

**Table 7. Breakdown of respondents responding to Question 22**

Respondent type	Yes	No	Total
Individuals	16	9	25
Hospitality	9	12	21
Charities and social enterprise	9	11	20
Manufacturing	14	4	18
Retailers	4	8	12
Others	7	4	11
Primary production business	2	4	6
Local government	1	1	2

Respondent type	Yes	No	Total
<b>Total</b>	<b>62</b>	<b>52</b>	<b>115</b>

Of those responding ‘Yes’, this was the majority view from individuals or the manufacturing sector. Of those responding ‘No’, this was the majority view of charity and social enterprises, retail or hospitality sectors.

Of the 53 respondents selecting ‘No’, 52 provided further reasoning, and several key themes emerged:

### **Pre-farm gate waste**

A majority expressed the sentiment that pre-farm gate waste from farms or primary producers must be included within scope under Option 2. This was due to the volume of food waste that occurs on UK farms, they expressed that missing this would not provide a clear picture of food waste in the UK.

One respondent from the primary production business sector stating: “There is a risk that if primary production food waste and surplus is not included in mandatory reporting that farmers will continue to suffer the costs of waste. The exclusion of mandatory reporting at this part of the supply chain could also create a greater risk that more food waste will be pushed onto farmers via unfair trading practices and that the full picture regarding food waste will remain hidden from view. Given that current estimates suggest that up to 7.2% of food is wasted in primary production, costing farmers £1.2 billion in potential lost revenue it is critical that farm level waste is addressed”.

This sentiment closely aligns with the Feedback campaign response.

### **Third-party businesses**

A small number also expressed the view that third party business should be excluded from Option 2, as they do not prepare or produce food so do not have oversight or control of food waste. They also expressed that this would allow for consistency with other policies which exclude transport, haulage, and distribution as this does not form part of the business’ own operations.

### **Public sector services**

A further few respondents expressed the need for public sector services such as hospitals, prisons, and universities to be included within scope of Option 2, citing the large quantity of food waste produced and concurrency with other policies.

One respondent from the manufacturing sector stating: “...The NHS’s own data (NHS Digital’s annual infrastructure data collection) shows the organisation sent 6,228 tonnes of

food waste for anaerobic digestion or composting in 2019-20. Therefore, we would encourage government to take a more holistic approach and include large-scale public sector organisations in its thinking.”

### **Other views**

There were a small number of respondents who did not answer Question 22 but did provide further detail in the free-text space provided. These views were aligned with points already expressed by responses summarised above, focussed on the need to consider pre farm gate waste, as well as how to consider waste from takeaways.

### **Feedback campaign responses**

The Feedback campaign (3,728 total responses) responded ‘No’ to this question. Their response can be summarised as follows:

- primary production food waste and surplus must be included in mandatory reporting, if not reported there is a risk that a large portion of food waste is completely missed
- not reporting could leave a loophole for waste to be pushed onto farmers through unfair trading practice

The Feedback campaign expressed a need for consistency across sectors, stating that: “mandatory reporting would enable meaningful action towards SDG 12.3. Some farmers have already demonstrated measuring their food waste is possible in collaboration with WRAP and WWF – developing a methodology by 2024 is achievable.”

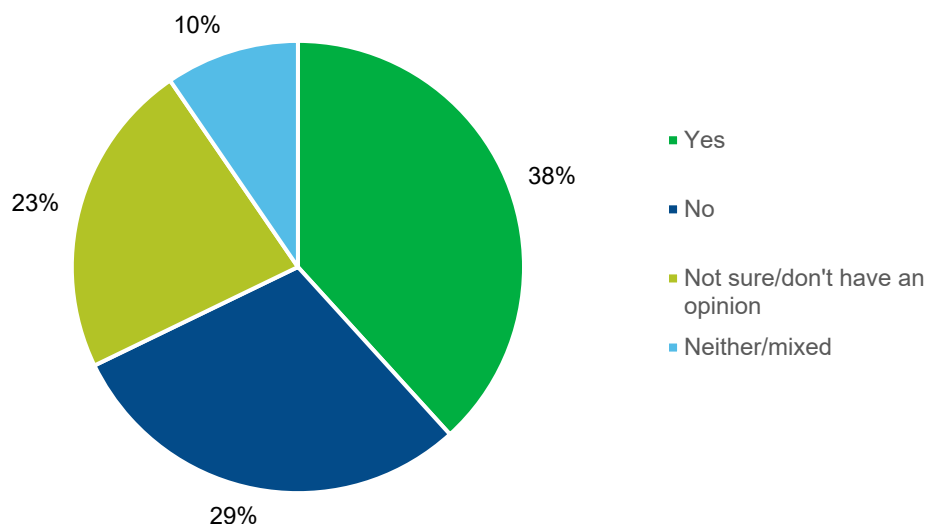
### **Q23. Do you think not-for-profit organisations, co-operatives and community benefit societies registered under the Co-Operative and Community Benefit Societies Act 2014 should be required to report their food waste?**

- **Yes**
- **No**
- **Neither or mixed**
- **Not sure or don’t have an opinion**

A total of 115 responses were received for Question 23. 3,736 respondents did not provide a response to this question, including the Feedback Campaign.

The figure 6 chart shows the split in the 115 responses received for Question 23.

**Figure 6. Percentage of 115 responses to Question 23 (excluding the Feedback campaign responses)**



There was no majority answer for this question, with most answers making up a large minority.

38% (44) respondents responded 'Yes', that is agreeing that these organisations should be required to report their food waste. 29% (34) responded 'No', while 23% (26) were not sure or did not have an opinion. The remaining 10% (11) were mixed in their views.

**Table 8. Breakdown of respondents responding to Question 23**

Respondent type	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Individuals	13	4	6	3	26
Charities and social enterprise	11	3	5	2	21
Hospitality	2	0	9	9	20
Manufacturing	5	1	5	7	18
Retailers	6	0	3	4	13

Respondent type	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Others	3	2	6	0	11
Primary production business	4	0	0	1	5
Local government	0	1	0	0	1
<b>Total</b>	<b>44</b>	<b>11</b>	<b>34</b>	<b>26</b>	<b>115</b>

The majority of individuals, charities and social enterprises, retailers and primary production businesses responded 'yes'. Most of the hospitality, manufacturing or other businesses responded 'No' or 'No opinion'.

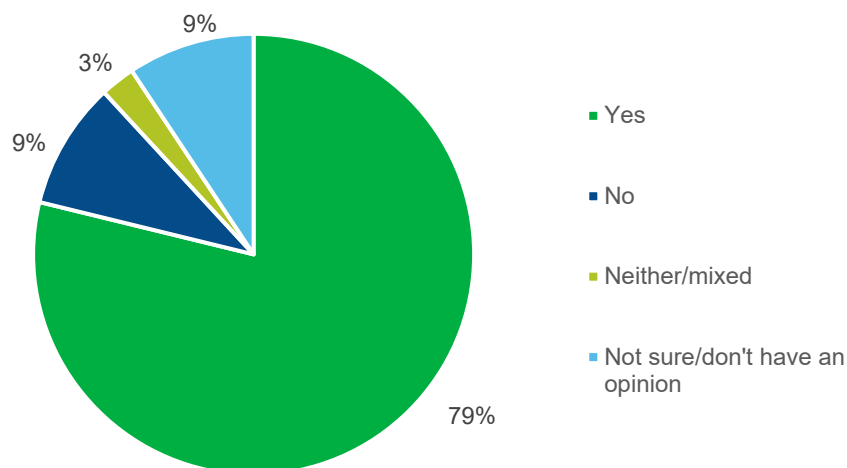
**Q24. Do you think that businesses in scope which operate with a franchise model should be required to measure and report food waste in this manner?**

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

A total of 3,847 responses were received for Question 24. Of these, 3,728 were from the Feedback campaign, and 119 were other respondents.

The figure 7 chart shows the split in responses from all but the Feedback campaign. These have been counted separately due to the number of responses received.

**Figure 7. Percentage of 119 responses to Question 24 (excluding the Feedback campaign responses)**



A majority (79%, 93) agreed businesses in scope which operate with a franchise model should be required to measure and report food waste in the manner described. This was the most frequent response from all respondent types. A small group (9%, 11) believed that they shouldn't, another small group (9%, 11) were not sure or did not have an opinion, and some (3%, 3) were mixed in their views.

The Feedback Campaign response (3,728 total responses) all responded 'Yes' to this question.

**Table 9. Breakdown of respondents responding to Question 24**

Respondent type	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Individuals	22	2	0	2	26
Hospitality	14	1	5	2	22
Charities and social enterprise	18	0	1	2	21
Manufacturing	14	0	1	3	18

Respondent type	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
<b>Retailers</b>	12	0	2	0	14
<b>Others</b>	8	0	2	1	11
<b>Primary production business</b>	4	0	0	1	5
<b>Local government</b>	1	0	0	0	1
<b>Grand Total</b>	<b>93</b>	<b>3</b>	<b>11</b>	<b>11</b>	<b>119</b>

The Feedback Campaign response (3,728 total responses) all responded 'Yes' to this question.

**Q25. Please briefly state your reasons for your response. Where available, please share evidence to support your view. (200 words max)**

Of the 3,847 people providing responses to Question 24, 85 'other' respondents provided further reasoning in Question 25.

Of those responding 'Yes', several key themes emerged:

- many respondents felt that all businesses should be obligated, as food waste is still waste regardless of the business model, and it would not be appropriate to separate the reporting requirements as the intention should be for all sites to comply
- many believed franchise model businesses should be required to measure and publish waste data as it would improve reporting systems - by doing so it would ensure a level playing field and deliver a clearer picture of the problem

Of those responding, 'No', several themes emerged:

- a majority expressed that the individual franchisees should be responsible for food waste reporting rather than the franchisors - it was felt that franchisees should be treated as the individual businesses that they are
- many respondents felt that franchisors shouldn't be mandated to report food waste as it would be impractical to have a separate reporting structure for franchisees
- many respondents felt that mandatory reporting would not be compatible with the franchisor-franchisee relationship as the level of centralisation is significantly lower

in a franchise model, and it is difficult for head offices to receive information from the store level

The Feedback Campaign provided 3728 'Yes' responses to Question 24. Their response to Question 25 warned that if franchises are not included within scope, a significant proportion of businesses would be excluded, and this would limit coverage. This is particularly important for the hospitality, food service and primary production sectors, which are more fragmented and currently have the lowest food waste data reporting and coverage.

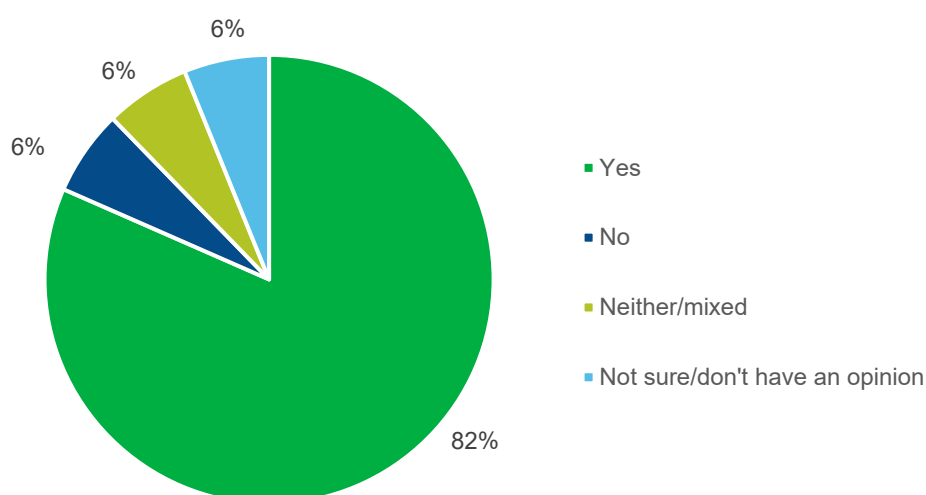
### **Q26. Do you agree that food contract packers and caterers should report food waste in their own operations as described?**

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

A total of 114 responses were received for Question 26. 3,730 did not provide a response to this question, including the Feedback Campaign.

The Figure 8 chart shows the split in responses from the 114 responses received.

**Figure 8. Percentage of 114 responses to Question 26 (excluding the Feedback campaign responses)**



A predominant group (82%, 93) agreed that food contract packers and caterers should report food waste in their own operations as described. This was the most frequent



response from all respondent types. A small group (6%, 7) disagreed, another small group (6%, 7) were mixed in their views, and another small group (6%, 7) were not sure.

**Table 10. Breakdown of respondents responding to Question 26**

Respondent type	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Individuals	23	2	0	1	26
Hospitality	13	2	2	3	20
Charities and social enterprise	19	1	0	1	21
Manufacturing	13	1	2	2	18
Retailers	11	0	2	0	13
Others	9	1	0	1	11
Primary production business	4	0	1	0	5
Local government	1	0	0	0	1
<b>Total</b>	<b>93</b>	<b>7</b>	<b>7</b>	<b>7</b>	<b>114</b>

**Q27. Please briefly state your reasons for your response. Where available, please share evidence to support your view. (200 words max)**

Of the 114 people providing responses to Question 26, 62 provided further details.

Of those responding 'Yes', several key themes emerged:

- a number of respondents believed that food contract packers and caterers should report food waste in their own operations as this would drive awareness of the issue and reduce the volume of food waste
- some respondents claimed that implementing this measure it would improve food waste reporting and provide an accurate record of food waste in England
- food contract packers and caterers were considered best placed to measure and report waste in their own operations to avoid double counting
- it was [predicted](#) that it would drive efficiencies in the supply chain and sector: “having a site based system to collect waste data drives efficiencies ... the data captured through [their scheme] ... enables impact-based focus to understand where efficiencies and reductions can be made at a site. This has resulted in operational changes preventing 437 tonnes of food waste from occurring.”

Of those responding, ‘No’, several key themes emerged:

- a majority of respondents felt by placing reporting responsibility on the product owner it would add ‘unnecessary complexity’ - it was considered resource intensive and without further clarity, a risk of either double counting or lost volumes
- additionally, for global businesses that buy and sell across countries, issues with accessing data from supply chains if production and packing occurs outside England could apply
- a number of respondents who answered ‘No’ disagreed with the proposal as they felt that reporting should be at the point of waste generation
- it was noted that brand owners have little control over waste generated within their supply chains and instead it makes sense for the reporting responsibility to lie where waste is created

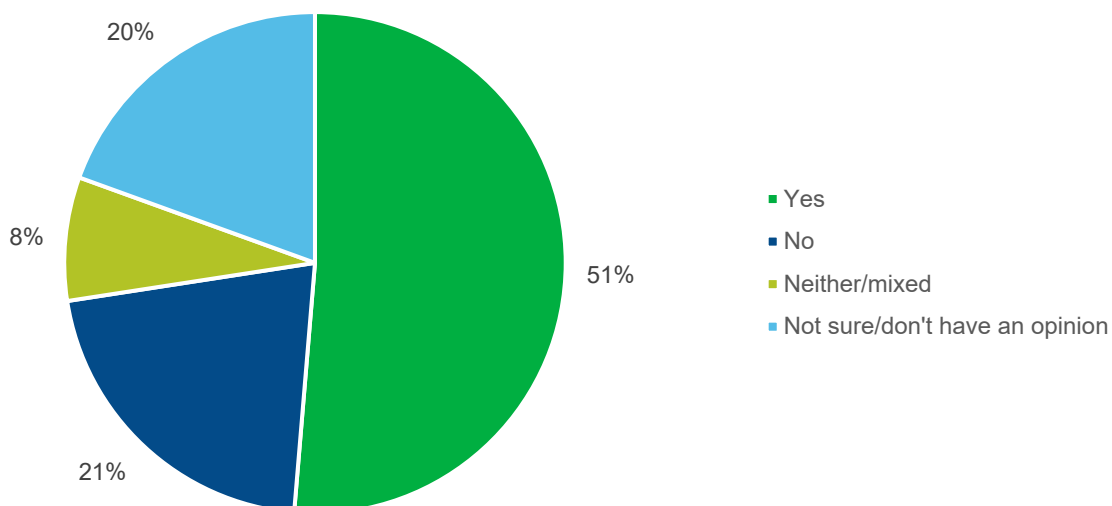
**Q28. Do you think that transport, distribution, and haulage businesses should be required to report food waste which occurs in transit?**

- **Yes**
- **No**
- **Neither or mixed**
- **Not sure or don’t have an opinion**

A total of 113 responses were received for Question 9. 3,738 did not provide a response to this question (that is ‘Not Answered’ or blank responses), of these 3,728 were from the Feedback campaign.

The figure 9 chart shows the split in the 113 responses received.

**Figure 9. Percentage of 113 responses to Question 28 (excluding the Feedback campaign responses)**



A majority (51%, 58) agreed that transport, distribution, and haulage businesses should be required to report food waste which occurs in transit. However, another 21% (24) did not agree with the inclusion of these businesses in food waste reporting. A further, 20% (22) did not have an opinion, and 8% (9) were mixed in their views.

**Table 11. Breakdown of respondents responding to question 28**

Respondent type	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Individual	21	1	3	1	26
Charities and social enterprise	8	2	5	6	21
Hospitality	10	2	2	4	18
Manufacturing	6	2	7	3	18
Retailers	6	0	5	2	13

Respondent type	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Others	4	2	1	4	11
Primary production business	3	0	1	1	5
Local government	0	0	0	1	1
<b>Total</b>	<b>58</b>	<b>9</b>	<b>24</b>	<b>22</b>	<b>113</b>

The majority of respondents from individuals, hospitality and primary production businesses responded 'Yes' whilst respondents from charities and social enterprises, manufacturing and retail were more divided.

**Q29. Please briefly state your reasons for your response. Where available, please share evidence to support your view. (200 words max)**

Of the 113 responses provided to Question 28, 61 respondents provided further reasoning to support their response in Question 29.

Of those responding 'Yes' several key themes emerged:

- a large minority agreed that transport and haulage should be included in food waste reporting, as this is a current gap in data - reporting on this would provide an accurate overall picture of food waste, with the relevant data allowing for targeted action. One hospitality sector respondent stated: "The transport & transit are a critical part of the value chain, therefore excluding this important stakeholder group may lead to under reporting at a local or national level and impact the sectors' ability to identify hotspots."
- a further minority expressed the need for transport and haulage to be included in reporting so that there are no gaps or loopholes to exploit - reporting on this would provide an incentive for haulage companies to minimise waste due to spoilage in transit. One hospitality sector respondent stating, 'If there is a gap in the food system businesses will exploit it in order to reattribute the food waste to that gap.'

Of those responding 'No' several key themes emerged:

- a small number did not think transport and haulage should be included in reporting, as they believed that this data would already be captured by the relevant

customer/owner of the food. One respondent from the charities and social enterprise sector stated 'Any food waste arising in this part of the supply chain would typically be recorded by a haulier/distribution business and reported back to the customer.'

- a further few felt that transport should be excluded from reporting, as this sector accounts for a small proportion of food waste and the resources needed to report this data would not be proportionate to the potential benefits

Of those who responded 'Not sure' or 'Neither or mixed' opinion, 13 provided further detail in Question 29. The majority of the views expressed aligned with those detailed above.

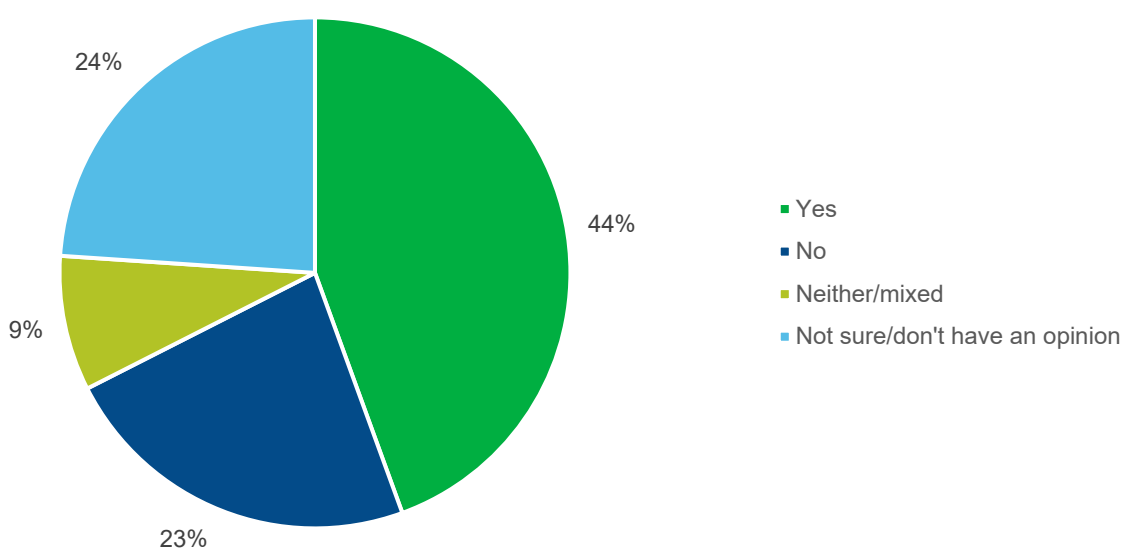
### **Q30. Do you think that third party delivery businesses should be required to report food waste which occurs in their operations?**

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

A total of 117 responses were received for Question 30. 3,734 did not provide a response to this question, of these 3,728 were from the Feedback campaign.

The figure 10 chart shows the split in the 117 responses provided.

**Figure 10. Percentage of 117 responses to Question 30 (excluding the Feedback campaign responses)**



A large minority (44%, 52) agreed that third party delivery businesses should be required to report food waste which occurs in their operations. Conversely, 24% (28) were not sure

or did not have an opinion. A further 23% (27) responded 'No' - they do not think third party delivery businesses should be required to report food waste which occurs in their operations. A smaller number, 9% (10) were mixed in their views.

**Table 12. Breakdown of respondents responding to Question 30**

Respondent type	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Individuals	18	2	2	4	26
Charities and social enterprise	8	4	1	8	21
Hospitality	11	3	4	3	21
Manufacturing	5	1	7	5	18
Retailers	4	0	7	2	13
Others	4	0	4	3	11
Primary production business	2	0	1	2	5
Local government	0	0	1	1	2
<b>Total</b>	<b>52</b>	<b>10</b>	<b>27</b>	<b>28</b>	<b>117</b>

The majority of respondents from individuals and hospitality responded 'Yes'. The majority of manufacturers and retailers responded 'No'. Respondents from charities and social enterprises and primary production businesses were more divided between "Yes" and having no opinion.

**Q31. Please briefly state your reasons for your response to Q30. Where available, please share evidence to support you view. (200 words max)**

Of the 117 responses given to Question 30; 57 respondents provided further reasoning to support their response in Question 31.

Of those responding 'Yes' several key themes emerged:

- a large minority expressed the sentiment that the entire supply chain, all businesses, and organisations, regardless of type and size, should be required to report on food waste. This is because food waste is important to capture from all points in the supply chain, with one individual respondent stating: ‘food waste is food waste, regardless of the business size and where they handle food in the food production process.’ Failure to capture all food waste, could lead to under reporting and a risk of creating loopholes which can be exploited. Multiple respondents from the hospitality sector stating: ‘There cannot be gaps in the system otherwise businesses will use this gap to redistribute food waste to that gap.’
- a small number of respondents highlighted the need to include third party delivery businesses to get the full picture from data, and the potential ease in collecting this data through the technology and platforms used by these delivery services. Multiple respondents from the hospitality sector stated: ‘Delivery firms can use technology and data capture surveys, that they currently utilize for customer satisfaction, to collect data’

Of those responding, ‘No’, several key themes emerged:

- a small number expressed the sentiment that third party delivery services should be out of scope due to the limited oversight or control over the food that they are delivering - these businesses do not prepare or produce food so would be limited in the data they could capture and the interventions they could put in place
- respondents also stated that this would be consistent with the policy of excluding transport, distribution, and haulage businesses as the business doesn’t have ownership over the food material
- a further few also expressed the sentiment that food waste from third party delivery services will be negligible due to the ‘just in time’ nature of the business - meaning that most third-party delivery services are picking up food, may this be takeaway or raw ingredients, to immediately deliver to the customer. The food is stored for a minimal amount of time, meaning spoilage is unlikely, food waste should only be a result of spillage, or incorrect fulfilment - any waste that is produced is likely to already be captured by the business which owns the food

Of the ‘not sure’ responses, a small number expressed the view that third party delivery services are best approached through voluntary measures.

## Material

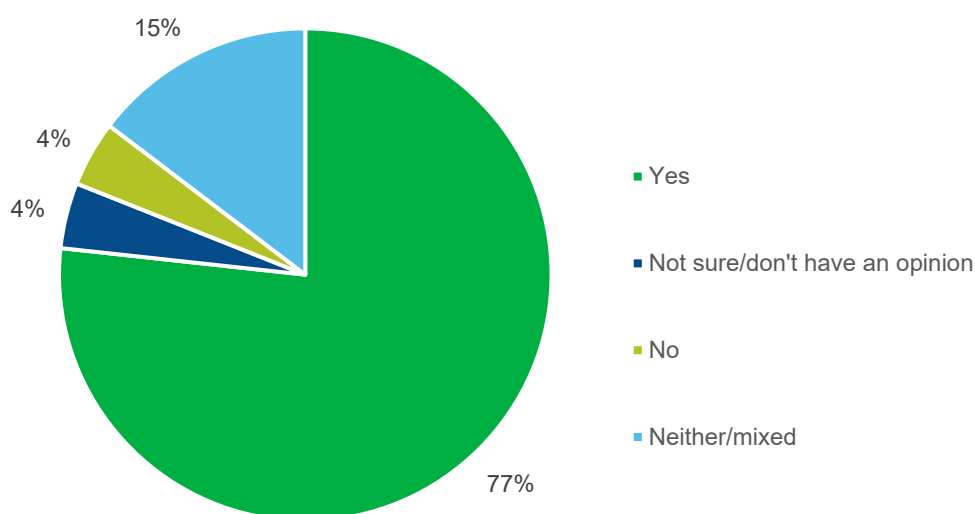
### Q32. Do you agree with the list of destinations or processes above?

- Yes
- No
- Neither or mixed
- Not sure or don’t have an opinion

There was a total of 3,844 responses to Question 32. Of these, 3,728 were from the Feedback Campaign, and 116 were other responders.

The figure 11 chart shows the split in 116 other responses received for Question 32.

**Figure 11. Percentage of 116 responses to Question 32 (excluding Feedback campaign responses)**



A majority (77%,89) agreed with the list of destinations or processes mentioned above. This was consistent across all respondent types.

15% (17) were mixed in their views while 4% (5) were 'Not sure' or 'did not have an opinion'. The remaining 4% (5) responded 'No' - they did not agree with the list of destinations/processes.

**Table 13. Breakdown of respondents responding to Question 32**

Row Labels	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Individual	16	8	0	2	26
Hospitality	14	4	2	2	22
Charities and social enterprise	16	3	0	1	20



Row Labels	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
<b>Manufacturing</b>	15	1	2	0	18
<b>Retail</b>	13	0	0	0	13
<b>Other</b>	9	1	1	0	11
<b>Primary production business</b>	5	0	0	0	5
<b>Local gov</b>	1	0	0	0	1
<b>Total</b>	<b>89</b>	<b>17</b>	<b>5</b>	<b>5</b>	<b>116</b>

The Feedback Campaign provided 3,728 'Yes' responses to this question.

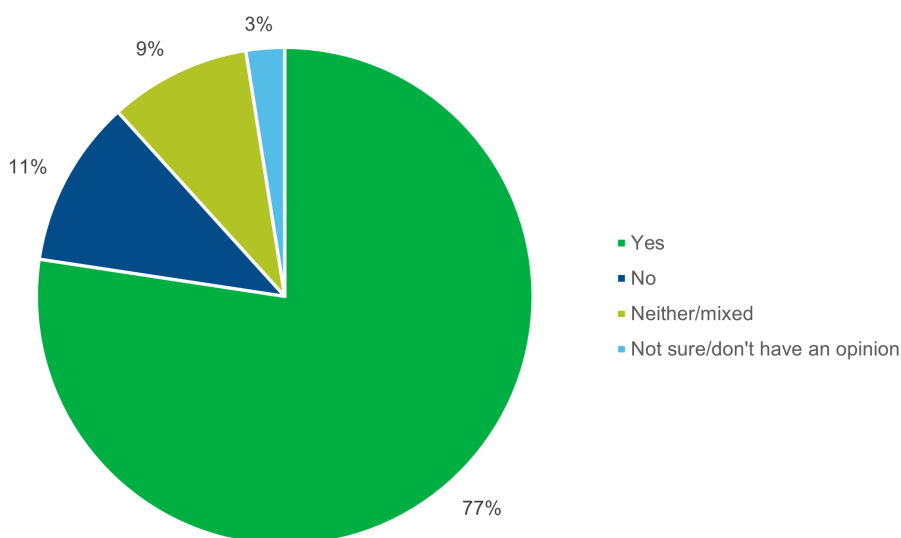
**Q33. Do you think that the reporting of redistributed food surplus should be mandatory for businesses in scope? - redistributed food in scope?**

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

There was a total of 3,848 responses to Question 33. Of these, 3,728 were from the Feedback campaign, and 120 were other respondents.

The figure 12 chart shows the split in responses from all but the Feedback campaign. These have been counted separately due to the number of responses received.

**Figure 12. Percentage of 120 responses to Question 33 (excluding Feedback campaign responses)**



The majority of respondents (77%, 93) agreed that the reporting of redistributed food surplus should be mandatory for businesses in scope. This was consistent across all respondent types.

Some respondents (11%, 13) responded 'No' - they did not agree that this reporting should be mandatory. A small number (9%, 11) were mixed in their views, and the remainder (3%, 3) were not sure/did not have an opinion.

**Table 14. Breakdown of respondents responding to Question 33**

Row Labels	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Individual	18	6	1	1	26
Hospitality	12	1	8	1	22
Charities and social enterprise	19	1	1	0	21
Manufacturing	17	0	2	0	19
Retail	12	2	0	0	14

Row Labels	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Other	9	0	1	1	11
Primary production business	4	1	0	0	5
Local gov	2	0	0	0	2
<b>Total</b>	<b>93</b>	<b>11</b>	<b>13</b>	<b>3</b>	<b>120</b>

The Feedback Campaign provided 3,728 'Yes' responses to this question.

**Q34. Please briefly state your reasons for your response. Where available, please share evidence to support your view. (200 words max)**

Of the 120 respondents from Question 33, 96 provided further reasoning to support their response in Question 34.

Of those that responded 'Yes', several of the key themes emerging from these reasonings were:

- a large minority expressed the sentiment that the redistribution of surplus food is something to be encouraged as it serves a social benefit and moves food up the Food Surplus and Waste Hierarchy, and therefore the reporting of it should also be encouraged. One retailer commented “by including food surplus redistribution in Option 2, businesses would be pushed to maximise food redistribution over less beneficial alternatives and address the growing cost of living crisis at the same time.”
- a minority believed that the reporting of redistributed food would benefit businesses as it could be good for their reputations and in holding companies to account
- another minority expressed the view that many companies are already reporting redistributed food as surplus so making the practice mandatory may not be necessary but is also unlikely to effect on how businesses operate

Of those that responded 'No', the following themes were identified:

- a majority of respondents stated that mandatory reporting of food waste surplus would lead to increased costs in terms of time, labour, and administration

- a minority group expressed the view that the reporting of redistributed food surplus should be voluntary, as opposed to mandatory, as it is not relevant for understanding the scale of food waste

**Q35. Do you consider there to be any additional costs or burdens associated with measuring and reporting redistributed food surplus in addition to those identified for food waste sent to other destinations?**

A total of 60 responses were received for Question 35. 3,789 did not provide an answer to this question, including the Feedback campaign.

Several of the key themes emerging from these responses were:

- a majority of respondents believed that there should not be any additional burden or cost associated with measuring and reporting of food surplus, as this should be aligned with standard practice
- any additional cost should only be during implementation and will be offset by savings as a result of better stock management
- one respondent from the charities and social enterprise sector stating: “There are potential benefits to measuring and reporting surplus as it can help identify drivers of repetitive surplus (such as poor forecasting) which in turn drives over production. The process itself should result in minimal additional labour cost if integrated into the process of measurement of waste.”
- a large minority of respondents believed that the stated reporting would result in additional burden and additional costs, mainly associated with labour and resources
- there was a lack of consistency as to the anticipated scale of this burden, with many citing the particular pressures that the charity sector may feel as their reporting tends to be more manual
- one respondent from the retail sector stating: “Whether internal or from a third party there is a cost and resource required on additional administration and reporting tasks, especially if they need to reconcile their own records of redistribution with the reporting from the redistribution organisations.”

## Proposals for reporting process

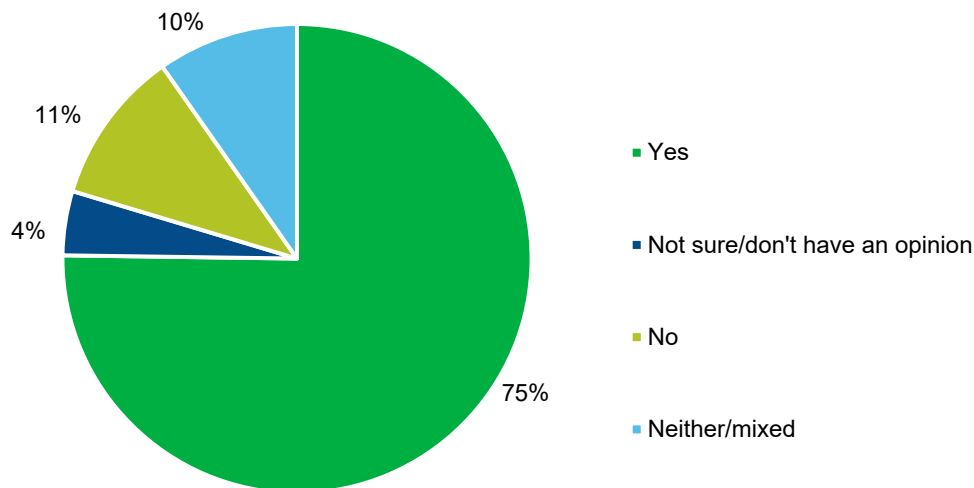
**Q36. Are you content with the proposal to amend the Environmental Permitting (England and Wales) Regulations 2016 (the EPRs) to require food businesses of a certain size to report their food waste data?**

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

A total of 113 responses were received for Question 36. 3,738 respondents did not provide a response to this question, including the Feedback Campaign.

The figure 13 chart shows the split in responses received for Question 36.

**Figure 13. Percentage of 113 responses to Question 36 (excluding Feedback campaign responses)**



A majority (75%,85) responded 'Yes' - they were content with the proposal to amend the EPRs to require food businesses of a certain size to report their food waste data. This was consistent across all respondent types, except local government with one response for 'neither/mixed'.

11% (12) responded 'No', while 10% (11) were mixed in their views. The remaining 4% (5) were 'not sure or did not have an opinion'.

### **Q37. Is your business currently required to obtain permit(s) for Installation sites?**

- Yes
- No
- Not sure
- No applicable

A total of 84 responses were received for Question 37. 3,767 respondents did not provide a response to this question, including the Feedback Campaign.

There was no majority answer to this question. A minority (40) responded that this question was not applicable to them. 17 responded 'No', they were not required to obtain permit(s) for installation sites, while 16 of were 'Not sure'. The remaining 11 responded 'Yes', their businesses are currently required to obtain permit(s) for Installation sites.

The majority of responses representing manufacturing stated 'not sure' (8) or 'yes' (6). The majority of responses representing hospitality stated 'not sure' (5) or 'no' (5). The majority of responses representing retailers (5), charities and social enterprises (2) and primary production businesses (2) responded 'no'.

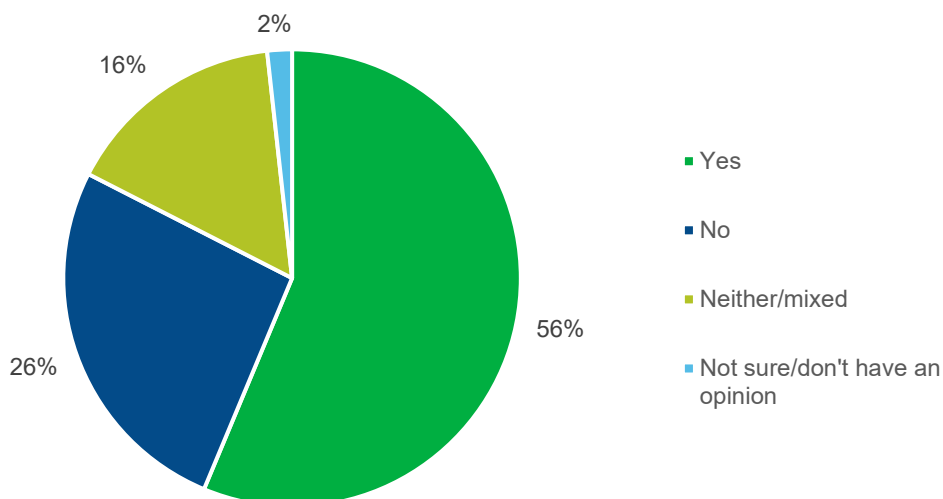
### Q38. Do you agree with the measurement and reporting requirements outlined?

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

There was a total of 115 responses to Question 38. 14 respondents did not provide a response to this question.

The figure 14 chart shows the split in responses:

**Figure 14. Percentage of 115 responses to Question 38 (excluding Feedback campaign responses)**



The majority (56%, 65) of respondents agreed with the measuring and reporting requirements outlined. A large number (26%, 30) responded 'No' - they did not agree with the measuring and reporting requirements. A small number (16%, 18) were mixed in their views, and the remaining 2% (2) were not sure or did not have an opinion.

**Table 15. Breakdown of respondents responding to Question 38**

<b>Respondent types</b>	<b>Yes</b>	<b>Neither or mixed</b>	<b>No</b>	<b>Not sure or don't have an opinion</b>	<b>Total</b>
<b>Individuals</b>	14	4	6	0	24
<b>Hospitality</b>	14	5	2	1	22
<b>Charities and social enterprise</b>	15	2	4	0	21
<b>Manufacturing</b>	8	2	8	0	18
<b>Retailers</b>	6	0	7	0	13
<b>Other</b>	6	1	2	1	10
<b>Primary production business</b>	2	3	1	0	6
<b>Local government</b>	0	1	0	0	1
<b>Total</b>	<b>65</b>	<b>18</b>	<b>30</b>	<b>2</b>	<b>115</b>

The majority of all respondent types stated 'yes', except for those representing manufacturing and retailers (split between 'yes' and 'no') and primary production businesses (split between 'yes' and 'neither or mixed').

**Q39. Please briefly state your reasons for your response. Where available, please share evidence to support you view. (300 words max)**

Of the 115 respondents from Question 38, 76 provided further reasoning to support their response in Question 39.

Of those that responded 'Yes', several of the key themes emerging from these responses were:

- a large minority agreed with the measurement and reporting requirements but expressed the sentiment that these requirements need to be fair and accommodating to all sizes of business. There was concern over the costs for small businesses and a preference for a representative sample being taken

- another large minority agreed, while expressing the view that there needs to be a unified database for all food waste data, and that companies should also be encouraged to publish this data on their own websites. One respondent from the hospitality sector wrote “data for all businesses should be published on a unified website collating all businesses reporting (the EA or FWRR). Brands should then be required to publish a link to that website on their own website to allow consumers access to their data.”
- another large minority agreed with the requirements but emphasised the need for reporting and measurements to be conducted in a representative, stringent and detailed manner

Of those that responded ‘No’, the following themes were identified:

- a small minority of respondents stated that businesses should be able to choose their own reporting schedule to align with other reporting commitments
- another small minority of respondents highlighted the increased financial, time and administrative burdens third party quality assessment requirements would cause if made mandatory. One manufacturer stated, “mandatory third-party assessment is an unnecessary financial burden on business and as we have stated that recording this data should be across all businesses then the cost for all foodservice and supply chain businesses there would be a compound cost to the supply chain which is unwelcome.”

**Q40. Where do you think that food businesses should be required to publish their data? (Please select one or more options)**

- **Own website**
- **Other website or platform. Please provide further detail**
- **Not sure or don’t have an opinion**

A total of 155 responses were received for Question 40. 3,728 Feedback Campaign responders did not provide a response to this question.

Respondents were able to choose more than one option to indicate where they think businesses should be required to publish their data. In our analysis, we summed the number of times each selection was chosen.

There was no majority answer for this question, with most answers making up a large minority. 46% (71) respondents view was that food businesses should be required to publish their data on their ‘Own website’. Many (39%,60) believed that food businesses should be required to publish their data on ‘Other website’, while the remaining 15% (24) were ‘Not sure’ or did not have an opinion on where to publish their data.



**Table 16. Breakdown of respondents responding to Question 40**

Row Labels	Own website	Other website	Not sure or No opinion	Total
Hospitality	16	11	5	32
Individual	14	12	6	32
Charities and social enterprise	14	15	2	31
Manufacturing	10	6	4	20
Retail	10	5	3	18
Other	3	7	2	12
Primary production business	3	3	2	8
Local gov	1	1	0	2
<b>Total</b>	<b>71</b>	<b>60</b>	<b>24</b>	<b>155</b>

Of the 60 respondents that believed food businesses should be required to publish their data on 'Other website', 46 respondents provided further reasoning to support their response and named the 'other websites and platforms' to publish their data.

A large minority (16) believed that the Environment Agency's website should be used to publish data as it can be one accessible place, easily searchable, and easy to input the data.

Another large minority (16) felt that a single point of data entry and reporting would significantly reduce data administration and reporting time and therefore an official 'Central site' should be used to publish data where it can be viewed and accessible easily. However, these respondents did not mention the name of any responsible organization or authority that should be responsible for managing the 'central site'.

Number of respondents (5) identified the 'The Food Waste Atlas' as a common website or platform for food waste data to be shared.

**Q41. If you do not agree that businesses in scope should be required to employ an independent third-party consultant to provide quality assurance checks for food waste data reports, please briefly state the reason for your response and how you would suggest data submitted by businesses is quality assured. (200 words max)**

There was a total of 59 responses to Question 41. 64 respondents did not provide a response to this question ('Not Answered' or blank responses).

From these responses, several of the key themes emerging were:

- a large minority expressed concern that this would place an unnecessary financial burden on businesses, particularly medium-sized businesses
- another large minority preferred other methods for quality checking reports, for example, through internal audits or by sampling a proportion of businesses. One manufacturer stated, “any third-party auditing should be carried out on a representative sampling basis (so the scheme owner would select on a sensible basis) - this should not be mandatory for all - that would be overkill and take resource away from the principle focus of reducing waste.”
- another large minority highlighted that many companies already perform quality checking of their reports, often through third-party consultants or WRAP, and questioned why it should be mandatory for all

**Q42. If your business currently measures its food waste, does it currently publicly publish its data?**

- Yes
- No
- Not sure

A total of 58 responses were received for Question 42. 3,728 Feedback Campaign respondents and 65 other respondents did not provide a response to this question.

A majority (33) responded 'No', indicating that they currently do not publicly publish their data. Another 22 responded 'Yes', and the remaining (3) were 'Not sure'.

**Table 17. Breakdown of respondents responding to Question 42**

Row Labels	Yes	No	Total
Hospitality	4	15	19
Manufacturing	9	6	15

Row Labels	Yes	No	Total
Retailers	7	4	11
Other	0	3	3
Primary production business	1	2	3
Charities and social enterprise	0	2	2
Individuals	1	1	2
<b>Total</b>	<b>22</b>	<b>33</b>	<b>55</b>

The most frequent response for all respondent types was 'No' apart from manufacturing and retailers where 9 and 7, respectively, responded 'Yes'.

**Q43. If you answered no to Question 42, does your business plan to publish its food waste data in the future, even if any regulations are not introduced?**

- **Yes. Please provide further detail of when.**
- **No**
- **Neither or mixed**
- **Not sure or don't have an opinion**

A total of 37 responses were received for Question 43.

A majority (20) plan to publish their food waste data in the future regardless of regulations. These were responses from hospitality (13), manufacturing (5) and retailers (2). 4 responded 'No', 6 were mixed in their views and 7 were not sure or did not have an opinion.

9 respondents (representing hospitality businesses) did not commit to a timeframe for publishing food waste data. 3 respondents said they would publish data in 2022, 2 would in 2023, and 2 would by 2024. 1 respondent said they would publish between 2023 to 2024.

## Timeline for introduction under Option 2

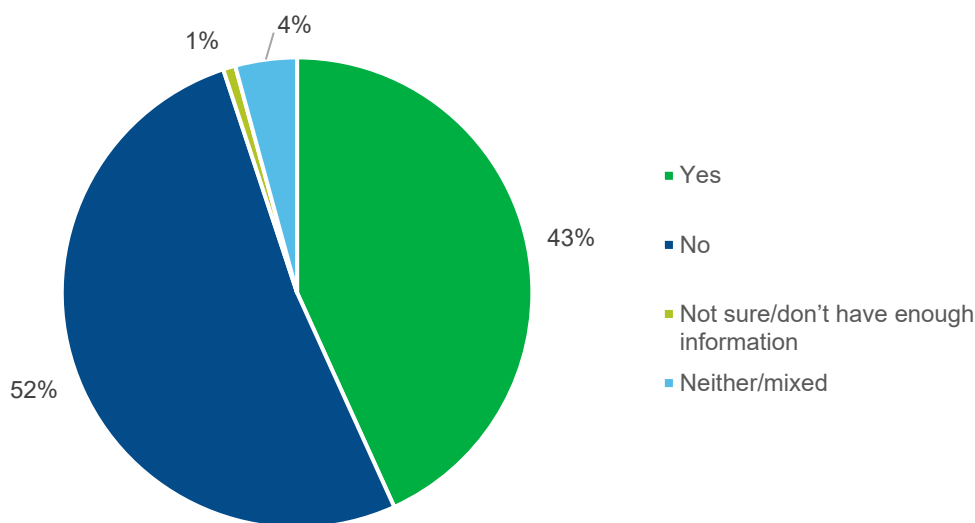
### Q44. Do you agree with the timeline for introduction proposed above for Option 2?

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

A total of 3,848 responses were received for Question 44. Of these, 3,728 were from the Feedback campaign. 3 did not provide a response to this question.

The figure 15 chart shows the split in responses from all but the Feedback campaign. These have been counted separately due to the number of responses received.

**Figure 15. Percentage of 118 responses to Question 44 (excluding Feedback campaign responses)**



A majority (52%, 61) did not agree with the timeline proposed for Option 2. 43% (51) did agree with the timeline, while a small number (4%, 5) were mixed in their views. Just 1% (1 respondent) responded 'Not sure'.

**Table 18. Breakdown of respondents responding to Question 44**

Respondent types	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Individuals	15	0	11	0	26
Hospitality	7	2	13	0	22
Charities and social enterprise	9	0	11	0	20
Manufacturing	10	2	6	1	19
Retailers	3	0	11	0	14
Other	5	1	5	0	11
Primary production business	2	0	3	0	5
Local government	0	0	1	0	1
<b>Total</b>	<b>51</b>	<b>5</b>	<b>61</b>	<b>1</b>	<b>118</b>

The majority of respondents representing hospitality (13), charities and social enterprises (11) and retailers (11) responded 'No'. The majority of respondents representing manufacturing (10) and individuals (15) responded 'Yes'.

The Feedback Campaign response (3,728 total responses) all responded 'No' to this question.

**Q45. If you answered no, please briefly state your reasons. (200 words max)**

Of the 3,789 people responding 'No' to question Q44, all provided further reasoning to support their response in Q45. The majority view did not agree with the timeline for introduction proposed for Option 2 because they believed it should be sooner. They point to 3 main reasons to justify a sooner timeline:

- 1) The delay since the 2018 Resources and Waste Strategy in publishing the consultation.
- 2) Perception that the UK would miss Sustainable Development Goal 12.3 to halve food waste by 2030, due to the shortened time for mandatory reporting.
- 3) Businesses already collecting food waste data, so no need to delay further.

This was also the sentiment expressed by the Feedback campaign responses.

A small number also disagreed with the timeline proposed for Option 2 but for the opposite reason presented above. This group believed the timelines should start later. This group believed that the timeline would largely depend on the timescales proposed for other consultations and policies within the Resources and Waste Strategy and the Government Food Strategy. This was because if timescales converged with other future requirements, this would be overly burdensome and put a lot of pressure on businesses.

## Analysis on the impact of the reporting requirements

### **Q46. Do you agree with the types of cost government has identified? - If no, why and evidence**

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

A total of 104 responses were received for Question 46. 19 did not provide a response to this question.

The majority response (53%, 55) agreed with the types of cost that the government have identified. Some (17%, 18) respondents were mixed in their views, while some (26%, 27) were not sure/did not have an opinion. A small number (4%, 4) responded 'No' - they did not agree with the types of cost that the government have identified.

The majority of all respondent types responded 'Yes', except for hospitality who were split between 'Yes' (8) and 'Neither or Mixed' (8), primary producers split between 'Yes' (2) and 'Not sure/No opinion' (3) and 'Other' who stated, 'Not sure or No opinion' (6) as the majority response.

Of the 49 respondents who answered 'No' or 'Neither or mixed' to Question 46, only 5 expanded on their answer.

The themes of these responses were:

- 3 respondents highlighted the additional costs for staffing and recruitment associated with measuring and reporting food waste

- respondents also emphasised the need for a more accurate cost-benefit analysis in terms of the money saved through reducing food waste, as well as quantifying the social and environmental advantages - this could be used to justify the increase in cost to businesses and incentivise engagement with reporting practices

**Q47. Do you agree with the assumptions, calculations and magnitude of the costs identified? (Further information is provided in the key assumptions section of the impact assessment) - agree with assumptions, calculations and magnitude of costs?**

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

**If you have answered 'No' or 'Neither or mixed', please provide an explanation and evidence if available to suggest why a different assumption or calculation should be used and for which cost**

A total of 3,827 responses were received for Question 47. Of these, 3,782 were from the Feedback campaign.

The majority response (40 respondents) was not sure or don't have an opinion. A small minority (25) of respondents agreed, while a small number (18) were mixed in their views. A small number (16) responded 'No' - they did not agree with the assumptions, calculations and magnitude of the costs identified.

Charities and social enterprise, individuals, other and local governments chose not sure/don't have an opinion as the most popular response. For hospitality and manufacturing this was mixed between not sure or don't have an opinion and no. For retailers the most frequent response was not sure or don't have an opinion and yes.

The Feedback Campaign provided 3,728 'Yes' responses to this question.

Of the 99 respondents in Question 46, 33 respondents provided further reasonings.

Of those who responded 'No', several of the key themes emerging were:

- one predominant theme expressed concern that businesses already have multiple reporting responsibilities and deadlines that could compound time and financial burdens, especially if required outside of the normal corporate reporting cycle
- another predominant theme suggested that the predicted costs for businesses had been greatly underestimated and the reporting requirements would be a more significant financial burden

- a majority of respondents presented an opposing view and highlighted that the cost estimates were calculated based on assumptions that were out of scope of the proposal and that the costs would likely not be as severe as predicted based on a representative sample

Of those who responded 'Neither or mixed' or 'Not sure or don't have an opinion', several of the key themes emerging were:

- a small number of respondents expressed concern that there would be disproportionate costs on different types or sizes of business
- a small number of respondents suggested that more resources need to be allocated to the regulators to ensure that they are properly funded. One respondent expressed the concern that "this scheme must receive adequate funding to avoid stretching the EA even further"

**Q48. Are there any other types of cost you can identify and, if available, please can you provide evidence of their magnitude per business or per premise or local outlet?**

A total of 18 responses were received for this question.

A majority of respondents did not provide any additional insight through their free-text responses. For example they answered with 'not sure', 'not at this stage', 'I don't know'.

Of the responses that did detail additional costs, very few of them provided specific figures or evidence, as the question requested – many simply referenced figures from the impact assessment. A few factors that were picked out include, transport, third-party consultancy costs, external staff costs, and the time needed to complete the reporting.

**Q49. What, if any, barriers would your business have to overcome in order to measure and report food waste?**

- **Cost**
- **Lack of experience**
- **Lack of staff**
- **Lack of skills**
- **Other**

**If 'Other' please provide further detail.**

A total of 52 respondents answered Question 49. The majority of respondents were from hospitality (18) and manufacturing (14). 8 were from retailers, 6 from charities and social enterprises, 3 individuals, 2 primary production businesses and 1 other respondent. As respondents could choose multiple choices, there were 100 responses received in total.



A majority (33) chose 'Other', 24 chose 'Cost' while 17 chose 'Lack of staff'. 15 chose 'Lack of experience' and 11 chose 'Lack of skills' as a barrier to measuring and reporting food waste.

Of those responding 'Other' several key themes emerged.

- a majority of respondents cited having different processes in UK nations as barriers to reporting food waste data. Many felt that as there are different ways of reporting food waste there needs to be one system with specific reporting guidance
- a small minority of respondents regarded time as a barrier, saying businesses needed a chance to adjust to these policies - "voluntary uptake has been relatively high during an exceptionally challenging time for the sector and we would urge the Government to provide the sector with further time to implement voluntary measures before placing regulation upon them"
- a large minority highlighted a financial barrier, however, many of these respondents did not choose 'Cost' as their response option to Question 49, instead selecting 'Other'
- an alternative view cited the socio-political context, such as COVID-19 and the energy crisis, as an obstacle to their food waste reporting

**Q50. What were the first year set up costs (for example staff time and investment in IT systems) for measuring food waste for your business?**

- £0-£500
- £501-£1,000
- £1,001-£5,000
- £5,001-£10,000
- £10,001-£15,000
- £15,001-£20,000
- £20,001-£30,000
- £30,000+

A total of 36 responses were received for Question 50. 13 from hospitality, 11 from manufacturing, 5 from retailers, 3 from charities and social enterprises, 2 primary production businesses and 1 individual. 3,728 individuals participating in the Feedback Campaign and 87 other respondents did not provide a response to this question ('Not Answered' or blank responses).

Table 19 shows the split in responses received for Question 50.

**Table 19. Responses to Question 50**

Respondent types	£0 - £1500	£501 - £1,000	£1,001 - £5,000	£5,001 - £10,000	£10,001 - £15,000	£30,000 +	Total
Charities and social enterprise	1	0	0	1	0	1	3
Hospitality	1	6	2	0	1	3	13
Individual	1	0	0	0	0	0	1
Manufacturing	0	1	2	1	4	3	11
Primary production business	1	0	1	0	0	0	2
Retail	2	0	0	0	0	4	6
<b>Total</b>	<b>6</b>	<b>7</b>	<b>5</b>	<b>2</b>	<b>5</b>	<b>11</b>	<b>36</b>

It should be noted that there is an overlapping of the range of costs given due to an error in the online survey (£0 - £1500 overlaps with £501 - £1,000 and £1,001 - £5,000 ranges). There was no majority view in response to this question, but the largest group, (11), responded that first year set up costs for measuring food waste was more than £30,000.

A small group (7) indicated that their first year set up costs ranged between £501 - £1,000, 6 stated £0 - £1500, 5 stated £1,001 - £5,000, another 5 stated £10,001 - £15,000 and the remaining 2 respondents stated between £5,001 - £10,000.

**Q51. In the first year of measuring food waste, how many staff hours did it take per premise and per businesses (head office level) to familiarise with reporting requirements? \_\_\_\_\_ staff hours**

A total of 33 responses were provided to Question 51. 11 from hospitality, 6 from manufacturing, 3 from retailers and 2 from charities and social enterprises. The Feedback campaign did not provide a response to this question.

Table 20 shows the average staff hours for the different respondent types. The average for all responses was 259.1 staff hours per premise and per business to measure food waste in the first year.

**Table 20. Responses to Question 51**

<b>Respondent types</b>	<b>Average per premise per business (hours)</b>	<b>Count of Responder type</b>
<b>Charities and social enterprise</b>	70	2
<b>Hospitality</b>	248.3	13
<b>Manufacturing</b>	89.2	9
<b>Other</b>	Not applicable	2
<b>Primary production business</b>	Not applicable	2
<b>Retail</b>	708	5
<b>Average</b>	<b>259.1</b>	<b>33</b>

Most, though a small number, of respondents (9) stated a requirement for less than 25 hours of staff time to familiarise themselves with reporting requirements in the first year of food waste reporting.

The majority of responses (17) were concentrated between 0 and 100 hours. Few organisations stated that over 101 hours of staff time would be required to familiarise with reporting in the first year, with 1 organisation stating 240 hours, another stating 500 hours, a further 2 stating 1060 hours and one stating 2000 hours.

**Q52. Since your first year of measuring food waste, what are the average ongoing annual costs of measuring food waste?**

- £0-£500
- £501-£1,000
- £1,001-£5,000
- £5,001-£10,000
- £10,001-£15,000
- £15,001-£20,000
- £20,001-£30,000
- £30,000+

A total of 33 responses were received for Question 52. 13 from hospitality, 11 from manufacturing, 5 from retailers, 2 from charities and social enterprises and one primary production business. 3,728 Feedback Campaign responders did not provide a response to this question.

Table 21 shows the split in 33 responses received for Question 52.

**Table 21. Responses to Question 52**

Respondent types	£0 - £500	£501 - £1,000	£1,001 - £5,000	£5,001 - £10,000	£10,001 - £15,000	£15,001 - £20,000	£30,000 +	Total
Charities and social enterprise	1	0	0	1	0	0	0	2
Hospitality	1	7	1	1	0	0	3	13
Manufacturing	1	3	1	1	1	2	2	11
Primary production business	1	0	0	0	0	0	0	1
Retail	1	1	0	0	0	2	2	6
<b>Total</b>	<b>5</b>	<b>11</b>	<b>2</b>	<b>3</b>	<b>1</b>	<b>3</b>	<b>7</b>	<b>33</b>

There was no majority view across all respondents. The largest group represented a large minority (11) who indicated that the average ongoing annual cost of measuring food waste ranged between £501 - £1,000. A small group (7) responded that their annual cost was more than £30,000 per year, while another small group (5) responded £0 - £500.

**Q53. How many hours a week on average does it take to measure food waste data per business premises? (Please answer based only on time taken to measure food waste, excluding any time taken to familiarise with or set up the process)**  
**\_\_\_\_\_ hours**

A total of 29 responses were received for Question 53. 11 from hospitality, 9 from manufacturing, 5 from retailers, 2 from charities and social enterprises and one from other and one primary production business. 3,728 Feedback Campaign responders did not provide a response to this question.

From these 29 responses, there was no majority views across all respondents regarding the average time (hours) required to measure the food waste data per premise. The average for all responses was 4.15 hours a week to measure food waste data per business premises.

**Table 22. Responses to Question 53 – Average hours a week split by respondent type**

Respondent types	Average (hours)	Count of Respondent type
Charities and social enterprise	2	1
Hospitality	2.33	3
Manufacturing	2.16	8
Other	0	1
Retail	13.37	3
<b>Average</b>	<b>4.146875</b>	<b>16</b>

**Q54. What are the average staff costs per hour for food waste measuring and reporting per business premise?**

A total of 25 responses were received for Question 54. 11 from hospitality, 9 from manufacturing, 2 from retailers, 2 from charities and social enterprises and one from other. The Feedback Campaign respondents did not provide a response to this question.

There was no majority view across responses received. An average of 8 quantitative staff costs provided was £19.75 per hour.

**Q55. How many days per year does it take in your head office to compile food waste data? If your business is UK wide, please respond in relation to your operations in England if possible. (Please answer based only on time taken to measure food waste, excluding any time taken to familiarise with or set up the process)?**

A total of 31 responses were received for Question 55. 12 from hospitality, 11 from manufacturing, 5 from retailers, one from charities and social enterprises, one from primary production business and one from other. The Feedback Campaign responders did not provide a response to this question.

There was no majority view across all respondents. The average reported by respondents was that it took the head office 9.51 hours per year to compile food waste data.

**Table 23. Responses to Question 55 – Average days per year split by respondent type**

Respondent types	Average (Days per year)	Count of Respondent type
Charities and social enterprise	30.5	1
Hospitality	5.3	5
Manufacturing	8.86	9
Retail	11.50	3
<b>Average</b>	<b>9.51</b>	<b>18</b>

**Q56. What are the average staff costs per day in your head office to compile food waste data for food measuring and reporting?**

A total of 27 responses were received for Question 56. 10 from hospitality, 10 from manufacturing, 2 from retailers, 2 from charities and social enterprises, one from primary production business and one from other. 3,728 Feedback Campaign responders and 96 other respondents did not provide a response to this question ('Not Answered' or blank responses).

There was no majority view across all respondents. The reported average costs per day in head office to compile food waste data was £152.27.

**Table 24. Responses to Question 56**

Respondent types	Average costs per day	Count of Respondent type
Charities and social enterprise	£250	1
Hospitality	£135	2
Manufacturing	£144.38	8
<b>Average</b>	<b>£152.27</b>	<b>11</b>

**Q57. Do you agree with the types of indirect benefits government has identified?**

- Yes

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

**If not, please briefly state your reasons.**

A total of 85 responses were received for Question 57. The Feedback Campaign did not submit any responses.

Table 25 shows the split in responses from those who answered.

A majority (62) agreed with the types of indirect benefits that the government have identified. This was across all respondent types. A small number (11) were not sure or did not have an opinion, some (8) were mixed in their views, and a few (4) responded 'No'.

**Table 25. Breakdown of respondents responding to Question 57**

Row Labels	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Hospitality	15	0	1	3	19
Manufacturing	10	2	2	2	16
Charities and social enterprise	12	2	1	0	15
Individual	10	1	0	3	14
Retailers	8	1	0	2	11
Other	3	2	0	0	5
Primary production business	4	0	0	0	4
Local government	0	0	0	1	1
<b>Total</b>	<b>62</b>	<b>8</b>	<b>4</b>	<b>11</b>	<b>85</b>

A majority (62) agreed with the types of indirect benefits that the government have identified. This was across all respondent types. A small number (11) were not sure or did not have an opinion, some (8) were mixed in their views, and a few (4) responded 'No'.

Of the 12 people providing the responses 'No' or 'Neither/mixed' to Question 57, 9 provided further reasoning to support their response. Half of respondents expressed the sentiment that there are additional wider social benefits from mandatory food waste measurement and reporting. One response noted the 'impact on poverty in feeding hungry people with good surplus food'.

### **Q58. Please can you provide evidence of whether and how the policy options presented in this document, can directly and indirectly affect the benefits described above in a qualitative and/or quantitative way.**

There were 43 responses received for Question 58. Of those who responded to the question, robust evidence from various studies were highlighted and several key themes emerged.

#### **Financial benefits**

A large minority felt that food waste reduction would be a financial benefit to businesses and those that have invested in food waste reduction have seen positive returns on investment. Respondents commented that food waste has a financial cost due to the raw materials, cost of production, labour, packaging and distribution so by measuring, reporting and taking action on food waste businesses can save financially.

The evidence from one project demonstrated that mandatory measurements save medium-sized businesses money as 76 SMEs in the hospitality and food service sector who took part in a 4-week food waste audit obtained an estimated annual saving of £6,063 per annum for each business.

A large minority expressed the sentiment that redistributing food has the potential to save carbon emissions. The [Fareshare report](#) noted that "for every 1 tonne of food that [we] redistributed in 2019 to 2020, we prevented the waste of 1.6 tonnes of embedded CO<sub>2</sub>e."

A large minority of respondents discussed the financial benefit to farmers from food waste reduction. WRAP's report [Food waste in primary production in the UK](#) estimated that food waste and surplus on UK farms has a value of £1.2 billion and that UK farmers could achieve a potential 20% increase in profits.

#### **Improve efficiency**

A large minority of respondents claimed that the policy options presented in Defra's document would increase understanding, efficiencies, and transparency across the sector. Many businesses are unaware of the severity of impacts and mandatory reporting would make them better understand food waste.



A focus on increasing efficiency of production and minimising waste would aid businesses to improve performance, identify problem areas and set targets. One respondent noted “today's disjointed approach and (a lack of) data availability means it is hard to identify hotspots and/or truly understand the performance of a value chain.”

### **Environmental benefits**

A large minority felt that food waste reduction would provide environmental benefits. This was felt mostly by charities and social enterprises. A [Life Cycle Assessment study](#) from a UK university found that reducing UK food waste by 50% from farm to fork through ambitious regulation would result in direct emissions savings of 13.6 million tonnes CO<sub>2</sub>e.

Additionally, the United Nation's Sustainable Development Goal 12.3 was referenced by various respondents and the need to ‘maximise the number of businesses implementing Target, Measure, Act’ in order to halve global food waste by 2030.

### **Other views**

A large minority of respondents expressed that mandatory measurement and reporting is not enough to tackle food waste, and it was warned that this policy alone will not go far enough.

A large minority felt that having a detailed awareness campaign across the sector is crucial for driving public awareness to meet targets. Measuring food waste allows customers to monitor and measure their food waste and community engagement is an additional benefit of carrying out and communicating this activity.

## **Q59 Are there any other benefits from food waste measurement and reporting that should be identified? Can you provide any evidence to support this?**

There were 52 responses to Question 59. Of those who responded, several key themes emerged:

### **Enhance innovation and efficiencies**

A large majority felt that food waste measurement and reporting would innovate businesses' own internal systems and improve data collection. Measuring and reporting encourages the development of solutions towards cost savings, resource efficiencies, employee motivation and the adoption of new innovative ways of working.

Benchmarking the industry will be a key tool for accurate and impactful carbon reduction initiatives and ‘mandatory reporting will result in much better data collection for food waste’. Therefore, mandatory reporting would provide a key opportunity for companies to review business models and make strategic changes to drive progress. Another respondent commented that public reporting ‘ensures companies are driving towards reducing food waste, net zero and overall sustainability’.

## **Raising awareness of food waste**

A large minority felt that another benefit would be a raised awareness of the issue with the public, policy makers and retailers. Food waste is a tangible sustainability topic that can be broadly understood by employees, customers and investors, so reporting would provide greater environmental awareness.

## **Social benefits**

A large minority of respondents felt that there are social benefits of food surplus redistribution to local communities and felt that redistribution should be prioritised over less impactful solutions further down the food waste hierarchy such as recycling and energy recovery.

Respondents, regarding surplus food redistribution sector, also raised the challenges over the cost of living among the citizens who use their services.

## **Enforcement Action**

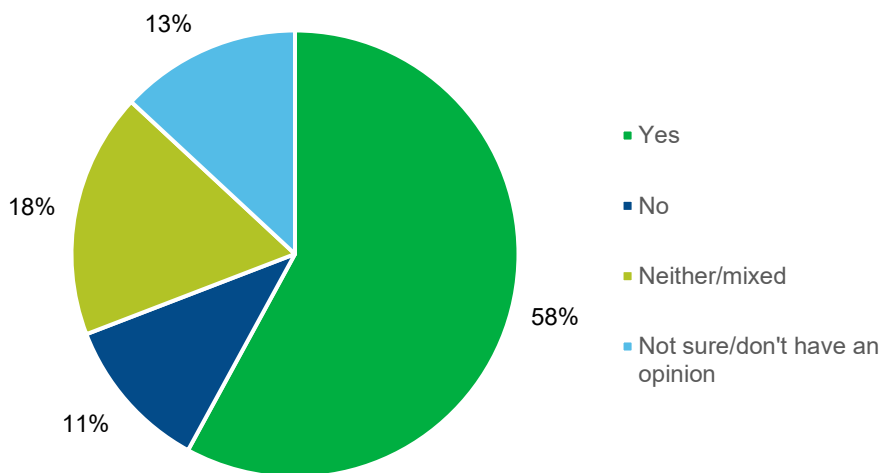
### **Q60. Do you agree with the enforcement actions proposed above?**

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

There was a total of 3,835 responses to Question 60. Of these, 3,728 were from the Feedback campaign and 107 were other responders. 16 did not provide a response to this question.

The figure 16 chart shows the split in responses from all but the Feedback campaign; these have been counted separately due to the number of responses received.

**Figure 16. Percentage of 107 responses to Question 60 (excluding Feedback campaign responses)**



The large majority (58%, 62) agreed with the proposed enforcement actions. A small number (18%, 19) of respondents were mixed in their views, and 13% (14) were not sure/did not have an opinion. A small number (11%, 12) responded 'No' - they did not agree with the proposed enforcement actions.

**Table 26. Breakdown of respondents responding to Question 60**

Respondent types	Yes	Neither or mixed	No	Not sure or don't have an opinion	Total
Hospitality	4	11	2	5	22
Charities and social enterprise	13	5	1	0	19
Individual	15	1	1	2	19
Manufacturing	13	0	4	1	18
Retail	6	0	3	4	13
Other	7	2	1	0	10

<b>Primary production business</b>	4	0	0	1	5
<b>Local gov</b>	0	0	0	1	1
<b>Total</b>	<b>62</b>	<b>19</b>	<b>12</b>	<b>14</b>	<b>107</b>

The majority of all respondent types agreed with the proposed enforcement actions, except for the majority of respondents from the hospitality sector who stated “neither or mixed” (11). The Feedback Campaign provided 3,728 ‘Yes’ responses to this question.

**Q61. Please briefly state your reasons for your response. Where available, please share evidence to support your view. (200 words max)**

Of the 123 respondents from Question 60, 66 provided further reasoning in Question 61.

Of those that responded ‘Yes’, several of the key themes emerging from these reasonings were:

- a majority of respondents believed that the enforcement measures outlined seemed to be sufficient, fair and reasonable
- another majority emphasised the need for the enforcement measures to be proportional and fairly distributed - they must also be consistent in terms of deadlines, standards and aligning with other reporting legislation. One respondent from the retail sector commented ‘enforcement should be undertaken in a proportionate and timely manner.’
- another majority agreed with the enforcement measures provided that businesses are given formal warnings and chances to improve
- the need for enforcement measures to be clearly published was also seen as important for avoiding ambiguity. One individual commented ‘as long as warnings, formal cautions, as well as prosecutions, were published in the public realm.’ This sentiment was also echoed by The Feedback Campaign responses
- yet another majority emphasised the importance of strict enforcement measures for ensuring compliance with the reporting requirements. One charity stated that ‘action needs to be taken against those who do not fulfil their commitments.’

Of those that responded ‘No’, the following themes were identified:

- a majority of respondents believe that the cost to regulators would be an unnecessary use of resources as many businesses are already measuring and reporting, and so there is no need for enforcement. One respondent commented that ‘enforcement is a significant cost in time and resources’

- a large minority believed that a scoring system would be more effective than financial penalties and that these scores could be published in a centralised place and on individual company websites
- another large minority suggested that reporting should not be mandatory and should therefore not be subject to enforcement measures - one manufacturer stated, 'we do not believe a system of mandatory reporting is justified.'

A small minority of respondents were 'not sure' or had 'mixed views.' The reasons for their answer were varied but can be grouped into the following themes:

- a majority emphasised the need for communication and warnings for those who are not complying to allow them time to adapt their practices before enforcement measures are implemented. One charity summarised this by saying 'prior to taking any formal action, enforcement officers should discuss issues with businesses on a case-by-case basis.'
- a small minority expressed the view that the enforcement measures need to be scalable, and fair based on the size of the business and their ability to comply with the reporting requirements - this closely reflects ideas expressed by The Feedback Campaign responses
- a small minority believe that penalties need to be enforced in a strict manner in order to reduce food waste and ensure compliance with the reporting requirements - one manufacturer went so far as to state that 'sanctions should be as tough as possible, for example x% of revenue to disincentivise food waste.'

Responses from The Feedback Campaign also spoke of the need for transparency about where the money raised through sanctioning non-compliant companies would be spent. There were also suggestions that this should be invested into food waste charities or put towards resources to assist businesses that may be struggling to meet their targets.

## Appendix A – Receipt and analysis of responses

### Responses received

In total, 3,851 respondents participated in this consultation. 105 responded via the online survey on Citizen Space and the remaining 3,746 responded via email. Of the total, 3,728 were individuals participating in a campaign organised by Feedback, a non-government organisation (NGO) who campaign to improve the food system based in London

Respondents were encouraged to submit an online response by completing an online survey hosted on Defra's consultation website, Citizen Space. A link to the Citizen Space survey was widely advertised online.

The online survey followed the questions asked in the consultation paper, featuring both closed (for example, tick-box questions), and open questions (asking for respondents to detail their views). 6 questions were mandatory. Apart from these, respondents were able to answer as many or as few questions as they wanted.

In total 3,851 separate responses to the consultation were received. This comprised 105 responses submitted via the Citizen Space online questionnaire and 3,746 responses submitted by email. Of the 3,746 responses submitted by email, 3,742 followed the structure of the Citizen Space questionnaire and answered all or some of the consultation questions directly. 4 responses did not answer the consultation questions directly, these contributions have been summarised under the most relevant questions.

In Question 4 of the consultation document, respondents could choose from a list of 21 categories that best describes them (such as primary producer, food manufacturer, distributor, individual). In this report, we have grouped these categories of respondents into larger groups in order to aid in the analysis. The groups have been designated as follows:

<b>Categories used in this report</b>	<b>Match with categories from Question 4 of consultation document</b>	<b>Number of respondents</b>
<b>Retail</b>	Retailer, distributor, wholesaler, commercial food redistribution organisation, retail trade bodies (for example British Retail Consortium, Association of Convenience Stores)	14
<b>Manufacturing</b>	Food manufacturer or producer, manufacturing trade bodies	20
<b>Hospitality</b>	Hospitality or food service provider, independent food haulier, food delivery business, hospitality trade bodies (for example UK Hospitality, British Beer and Pub Association)	22
<b>Individuals</b>	Individuals	3,756 in total, including those

Categories used in this report	Match with categories from Question 4 of consultation document	Number of respondents
		participating in the Feedback campaign
<b>Charities and social enterprise</b>	Charitable food redistribution organisation, community group, internet-based company, non-governmental organisation, charity or social enterprise, consultancy, academic or research	21
<b>Local government</b>	Local government	2
<b>Other</b>	Other	11
<b>Primary production business</b>	Primary producer (for example those involved in farming, fishing), primary production trade bodies (for example Dairy UK, Landworkers Alliance, National Farmers Union)	6

While the allocations are not an exact match in some cases, they have been grouped into the category that best fits, in order to draw conclusions and trends from the responses received.

## Analysis

Quantitative analysis of closed questions was conducted in Excel. Figures shown are based on the numbers of responses received for each question, which differ between questions. Not all respondents answered every question.

The responses provided by individuals participating in the Feedback campaign were analysed and reported on separately, due to the volume of their response compared to the rest of the respondents.

Quantitative analysis for closed questions receiving 100 responses or more is summarised in a pie chart. The quantitative analysis for closed questions receiving less than 100 responses is summarised in a table. Due to the low number of responses received for the

questions summarised in a table (less than 100), analysis for these questions is done by counts, not proportions.

Qualitative responses were analysed using keywords. Groups of keywords were used to categorise text responses received for each open-ended question, and then reviewed to establish common themes and the number of respondents agreeing with a certain sentiment. This means that one response could count towards several different themes, if it was a robust or substantial response covering several different points. For this reason, for some open-ended questions it is possible to have more than one view expressed by a majority of respondents, for example a majority of responses received shared opinion Y and another majority shared opinion X. Themes have been described in this summary report for each question if it represented at least 10% of the responses received for that question.

Selected quotes from organisations were reproduced in the report where the response reflected wider themes or accurately summarised the sentiment of others within that group.

## Appendix B – List of respondents

This list does not include those respondents that asked for their response to be kept confidential (20 additional organisations) or responses from individuals.

Keenan Recycling	Compass Group UK & Ireland
Climb the Green Ladder	Wealmoor
Agrial Fresh Produce Ltd	Sodexo Limited
COOK	British Retail Consortium
RW Stokes	Worldwide fruit
TowFood	Foodservice Equipment Association
Singleton Birch	Nestlé UK
Good Food Leicestershire	Magnete Ltd
Friends of Wish Park and Friends of Hove Lagoon	School of Law, University of Leeds
Getir	Industry Council for Packaging and the Environment



Brighton and Hove Food Partnership	Associated British Foods plc
Danone UK and Ireland	Rubies in the Rubble
The Compleat Food Group	IGD
Hampshire County Council	Too Good To Go
The Community Supported Agriculture Network UK	FareShare UK
Hawksmoor	Feeding Liverpool / Good Food Liverpool Policy Group
Dairy UK	Green Eco Technologies Ltd
Oddbox	OLIO Exchange Limited
The Co-operative Group	Premier Foods plc
PizzaExpress	Tesco
Bakkavor food group	Nature Friendly Farming Network
Just Eat	Waitrose & Partners
Ocado Retail Ltd	National Farmers Union (England & Wales)
Nutritics Ltd	LEAF Linking Environment And Farming
Sustainable Restaurant Association with signatories from: CH&CO, Peach Pubs, Rare Restaurants, Oxo Tower Restaurant Bar and Brasserie, The Restaurant Group	Suez Recycling & recovery UK limited
CH&CO Catering Company	Association of Convenience Stores (ACS)
Peach Pubs	British Beer and Pub Association
Rare Restaurants	
OXO Tower Restaurant Bar and Brassarie	
The Restaurant Group	
Kellogg's	
Costa Limited	

Veolia UK & Ireland

Association for Renewable Energy and  
Clean Technology (REA)

Sainsbury's

Landworkers Alliance

Asda Stores Ltd

Marks & Spencer plc

Feedback Global

UK Hospitality

National Trust - Food and Beverage  
Directorate

McDonald's UK & Ireland