Development of best practice on food date labelling and storage advice

This information sheet provides additional background on the labelling guidance published by WRAP, and written in conjunction with the Food Standards Agency (FSA; in conjunction with FSA in Wales, FSA Northern Ireland and Food Standards Scotland) and Defra Labelling. It also describes the process by which input was gathered from those to whom the guidance is aimed at (food producers and retailers, hospitality and food services businesses, charitable and commercial redistribution organisations and those involved in the enforcement of labelling-related regulations), and contains a list of frequently asked questions and answers.

Overview
WRAP worked with Defra Labelling and the FSA (including FSA Wales, FSA NI and Food Standards Scotland) to develop updated guidance on the application of date and related (for example storage and freezing) advice on pack. A draft was consulted on in summer 2017, and a final version published in late 2017. This guidance aims to enable further reductions in food waste at home and remove key barriers to increased redistribution.

Scope of the guidance:
- What the different date labels mean;
- How to decide what date to apply (and the consequences of this decision);
- Highlighting the importance of maximising both ‘closed’ and ‘open’ life, whilst ensuring quality and safety are maintained;
- Highlighting the importance of correct storage guidance, including fridge temperature and freezing advice;
- What can (and cannot) be done as the date approaches / is past (at home and for sale / redistribution); and
- Responsibilities (both for food sold through normal channels and food redistributed).

Important note: The new guidance developed by WRAP with Defra and the FSA did not involve changes to any existing legislation, nor does it anticipate the introduction of new legislation/regulation, nor any fundamental changes to the technical approach to setting durability dates.
**Context**

Around 2 million tonnes of food is thrown away from households due to ‘not being used in time’, and for a third of this, the date label is cited as a factor. Giving consumers longer to make use of the food they buy has the potential to significantly reduce household food waste. There are also significant barriers relating to redistribution and date labels on surplus food, and confusion around what can or cannot be done as dates approach or are passed. This guide aims to remove some of those barriers.

In relation to labelling practice, WRAP’s ‘Helping Consumers Reduce Food Waste – Retail Survey 2015’ (‘Retailer Survey, 2015’)

1 report provided a snapshot of relevant aspects of key products to assess the degree of progress since 2011, and identified where the focus going forwards should be to ensure maximum impact on household food waste. This research confirmed that good progress was being made, but that more needed to be done. Discussions with stakeholders suggested that one action that could help accelerate change was to update and consolidate the guidance on the application of date labelling and related advice, both in terms of what was legally required and also what was best practice to help reduce food waste.

Key audiences for the guidance include:

- Large grocery and hospitality businesses;
- Grocery and hospitality SMEs;
- Redistribution organisations (charitable and commercial);
- Enforcement officers; and
- Consumer groups and campaigns (to align messages).

The guidance was written with the participation of key industry and charity stakeholders. A draft version of the report was sent to a wide range of businesses, charity and consumer representatives as part of a consultation exercise and the guidance was modified and improved as a result of this consultation.

More detail is provided in the rest of this document, including how stakeholders helped to shape the guidance, and a set of relevant Q&As.

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1 Helping Consumers Reduce Food Waste: Retail Survey 2015
Background
Around a fifth of food brought in to UK homes ends up as waste. Of this 7.3 million tonnes, 4.4 million tonnes is defined as avoidable, and has a retail value of £13 billion. Previous research commissioned by WRAP identified not only how much food is thrown away from UK households but key insights into why this happens. The reasons for food waste at home are many and often interrelated. Aspects of food product labelling, design and functionality combined with consumers understanding of how to make best use of these can be key contributors.

In addition to changes in behaviour reducing food waste, technical changes in food products, packaging and labelling can also lead to less food being wasted, through enabling consumers to buy the most appropriate amounts of food and make greater use of what is bought (for example through having longer to eat the food bought). Around 2 million tonnes of food are thrown away from households due to it ‘not being used in time’. For a third of this, the date guidance on the pack is cited as a factor. Giving consumers longer to make use of the food they buy has the potential to significantly reduce household food waste. This can be influenced by, for example, the choice of date mark applied (‘Best Before’ rather than ‘Use By’), the length of time between purchase and the date expiring (so called ‘closed life’), guidance on how long a product can be consumed once it has been opened (‘open life’) and optimal storage/freezing guidance.

Although it is challenging to separate out the potential impacts of specific technical changes, it was estimated by WRAP that around 15% of the 1 million tonne reduction in household food waste from 2007 to 2015 was the result of such innovations (preventing around £400 million of food from being wasted). WRAP also estimated the potential further impact of technical changes, and this analysis suggested that around 350,000 tonnes of avoidable food waste (with a value of around £1 billion a year) could be prevented through technical changes, an 8% reduction in avoidable food waste or a 5% reduction in total food waste, compared to 2015 levels.

WRAP research also identified that in 2015, 270,000 tonnes of surplus food could have been suitable for redistribution, whilst only 47,000 tonnes was actually redistributed. There is the opportunity to increase redistribution four-fold by 2025, the equivalent of at least 360 million meals. There are significant barriers relating to date labels on surplus food, and confusion around what can or cannot be done as dates approach or are passed. This guide aims to remove some of those barriers.

Based on an extensive evidence base, and in consultation with the food industry, WRAP has developed a series of recommendations for how changes to products, packaging and labelling can help consumers buy the right amount of food and waste less of what they buy. The Retailer Survey, 2015 report provided an updated snapshot of relevant

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2 Household Food Waste in the UK, 2015; WRAP 2016
3 See Household Food and Drink Waste Resource Listing
4 Household Food and Drink Waste- A Product Focus 2014; WRAP 2014
5 UK food waste – Historical changes and how amounts might be influenced in the future; WRAP 2014
6 Quantification of food surplus, waste and related materials in the supply chain
7 Solutions to prevent household food waste and Concept to Consumer
aspects of the key products at a particular point in time. The aim of this work was to a) assess the degree of progress since 2011, and b) identify where the focus going forwards should be to ensure maximum implementation of industry guidance. It informs WRAP's work with retailers and manufacturers through the Courtauld Commitment 2025, in order to enable change and widespread adoption of good practice, with the aim of further reducing household food waste.

In 2009 a retail survey was conducted to review approximately 10,000 individual items across 19 product categories. In 2011 data was collected for approximately 12,000 individual items from 20 product categories. The retail survey was repeated in 2015 to assess key changes across the same product categories since the surveys were conducted in 2009 and 2011. Data was collected for approximately 9,000 individual items. A total of 78 stores were surveyed, across England, Wales and Scotland, including 5 online orders. The main areas of interest were changes to date labels, storage guidance, freezing and defrosting guidance and the availability of a range of pack sizes.

Key findings from the Retailer Survey, 2015 are shown in the box below.

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8 See http://www.wrap.org.uk/category/initiatives/courtauld-commitment for more information.
9 Helping consumers reduce food waste – a retail survey; WRAP, 2009.
10 Helping Consumers Reduce Food Waste: Retail Survey 2015
Areas of good progress:

- Simplification of date labelling - from 40% of packs having two dates (A ‘Display Until’ date used in combination with either ‘Use By’ or ‘Best Before’), which caused consumer confusion and the premature throwing away of food, to less than 3%
- Two high-volume products (hard cheese and pasteurised fruit juice) have moved away from predominantly carrying a ‘Use By’ to overwhelmingly carrying ‘Best Before’ dates. This gives consumers more flexibility to consume products after the date, but also illustrates that industry can reassess what date mark products should carry and make significant changes [94% of fruit juice had a ‘Use By’ date in 2009, only 4% in 2015]
- Good progress has been made in moving away from ‘Freeze on day of purchase’, following the publication of new guidance from WRAP/FSA in 2010, particularly in categories such as pre-prepared foods. This gives consumers more opportunity to preserve (and eat at a later date) food that might otherwise have ended up as waste. [100% of the branded and own brand chilled ready meals assessed in WRAPs 2015 research had the new guidance; as did 41% of bread and 65% of fresh chicken]

Priorities for action by retailers and manufacturers:

- Reviewing the choice of date label on products that carry a ‘Use By’ date and are wasted in high volumes, to establish whether this is justified from a food safety perspective. If not, moving to a ‘Best Before’ could help reduce food waste at home, and also in the supply chain: [WRAPs latest Retailer Survey revealed that 57% of multi-pack yogurts had a ‘Use By’ date in 2011, which had risen to 91% in 2015]
- Reviewing both ‘closed’ and ‘open’ life set for products that are wasted in large amounts due to not being used in time (for example fresh meat, milk and pre-prepared foods), and assessing the potential to extend the time available for consumers to make use of food at home. [There are several food types where the duration of open life guidance has reduced over time (and none where it had increased between 2011 and 2015);
  - Chilled chicken, 42% of packs had ‘use immediately’ in 2015 compared to 0% in 2011 whilst 43% of packs gave between 1 – 3 days in 2015, compared to 100% in 2011;
  - Chilled cooking sauces. 38% had 2 days or less in 2011, which had increased to 75% in 2015, whilst 63% had 3 days in 2011 which had fallen to only 15% in 2015]
- Reviewing refrigeration guidance - WRAP (and FSA) recommend that ‘store in the fridge below 5°C’ guidance should be used where temperature information is stated on-pack, and that this statement should be used in full where guidance is given to keep refrigerated [Cheese and yogurts showed the greatest variety in terms of temperature ranges, with six different ones observed in 2015]
- Continuing to implement WRAP/FSA Guidance on freezing advice¹, across all products that can be frozen at home, including maintaining or reinstating use of the snowflake logo (e.g. 50% of bacon still says ‘freeze on date of purchase’)
- Review the availability and relative pricing of smaller packs / split packs for products that are wasted in high volumes and primarily due to not being used in time (bread being a priority).
This research confirmed that good progress was being made in a number of areas, but that more needed to be done. Discussions with stakeholders suggested that one action that could help accelerate change was to update and consolidate the guidance on the application of date labelling and related advice, both in terms of what was legally required and also what was best practice to help reduce food waste.

**Guidance on date labelling and related advice**

Guidance to industry on applying date labels was last updated in 2011\(^1\), and was informed by WRAP research\(^2\). Related guidance from WRAP was published on storage and freezing advice, and sector-specific guidance has been developed by Dairy UK, the British Soft Drink Association (BSDA), the British Sandwich Association (BSA) and British Frozen Food Federation (BFFF) for example.

The primary focus was to help reduce food waste at home.

The new guidance has the wider objectives to enable further reductions in food waste at home and remove some of the key barriers to increased redistribution.

Scope of the guidance:

- Reiterate what the different date labels mean;
- How to decide what date to apply (and the consequences of this decision);
  - A 'Use By' should only be applied where there is a food safety issue; foods should not be consumed at home after midnight on this date, nor can they be redistributed or sold.
  - Food can be frozen up until the ‘Use By’ date for use at a later date (importance of defrosting and subsequent usage – e.g. ‘defrost thoroughly and use within 24 hours’).
  - Food can be eaten after the ‘Best Before’ date, and it is permissible to sell or donate foods past a ‘Best Before’ date, as long as they ‘meet the quality demanded by the purchaser’ (i.e. have been properly stored) and are safe to eat.
  - Therefore, having a ‘Best Before’ date gives more flexibility for consumers and food businesses / redistribution organisations to make use of food and reduce the likelihood of it being wasted.
- Importance of maximising both ‘closed’ and ‘open’ life, whilst ensuring quality and safety are maintained;
  - WRAP research suggests that there is potential to achieve this without new innovations, although new processes and packaging technologies could deliver additional benefits\(^3\).

\[A 1 \text{ day extension to product life across all types of foods currently}\]

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\(^{1}\) Guidance on the application of date labels to food, Defra 2011

\(^{2}\) Consumer insight: date labels and storage guidance, WRAP 2011; Helping consumers reduce food waste - a retail survey 2011, WRAP 2011

\(^{3}\) Reducing food waste by extending product life, WRAP 2015 and Extending product life to reduce food waste (guidance on reviewing product and open life), WRAP 2015
wasted could prevent 250,000 tonnes a year of food being thrown away in home].

- Importance of correct storage guidance, including fridge temperature and freezing advice;
  - Correct storage is essential to ensure that products maintain quality and are safe to eat up until the ‘Use By’ date or beyond the ‘Best Before’ date
  - WRAP (and FSA) recommend that ‘store in the fridge below 5°C’ guidance should be used where temperature information is stated on-pack, and that this statement should be used in full where guidance is given to keep refrigerated (this will help reinforce the importance of checking fridge temperatures, as up to 70% of fridges are operating at higher than recommended temperatures).
  - Continue to implement WRAP/FSA Guidance on freezing advice, across all products that can be frozen at home, including maintaining or reinstating use of the snowflake logo.

[WRAP has estimated that at least 800,000 tonnes of food is thrown away each year that could have been frozen to eat at a later date. This is associated with over 3 million tonnes of CO$_2$e and has a value of over £2 billion].

- What can (and cannot) be done as the date approaches / is past;
  - At home (‘Use By’, freeze before the date if possible; ‘Best Before’, safe to eat after the date).
  - Retail & redistribution (‘Use By’, potential to freeze and redistribute; or test and re-label food for redistribution; ‘Best Before’, can be sold/redistributed after the date).

- Responsibilities (both for food sold through normal channels and food redistributed).

**Consultation that informed the development of the new guidance**

Prior to developing the new guidance, WRAP consulted with a range of stakeholders, from business and those involved with the redistribution of surplus food. This took place through existing Courtauld 2025 channels. Key questions asked included:

- The scope of the guidance (what should be included?).
- The structure of the guidance (what would be most useful?).
- The process for consulting.
- Recommendations on format/tailored versions for different audience.

A series of key principles were agreed, based on the above discussions and learnings from the development of, and feedback on, the 2011 guidance:

- The guidance must address the key areas of uncertainty and not be limited to mandatory requirements;
- Materials produced need to be concise and tailored to relevant audiences
- Needs to be more ‘visible’ and easy to make use of;
- Must be consistent with current legislation, and backed up by relevant technical documentation; and
• It should be consulted on with industry, but avoiding a long and potentially bureaucratic process.

It was agreed that the following would be outside of the scope of the new guidance:
• Recommending changes to date labelling terminology (i.e. alternatives to ‘Use By’ or ‘Best Before’ terms); and
• Challenging which foods are exempt from requiring any date label
Both of the above are being discussed at a European level.\(^\text{14}\)

A draft of the guidance was developed by WRAP, FSA and Defra Labelling, and refined through discussions with business and redistribution organisation representatives.

The consultation was launched with a press release in July 2017 (see Annex 2), seeking input from a wide range of individuals and organisations, which received significant coverage in the mainstream and trade press. WRAP, FSA and Defra also made use of a range of other channels to ensure there was a high level of awareness of the consultation. A draft of the guidance was available to download, and a survey enabled respondents to provide both structured and freeform input (see Annex 3).

More than 60 responses were received, from across the sector - retailers, manufacturers, hospitality and food service businesses, trade associations, redistribution organisations, those involved in enforcement, academics and consumer/campaign groups. More than 30 responses came from food businesses and sector trade bodies, around 10 each from those involved in redistribution or enforcement, and around 10 from other groups and individuals. In parallel to the consultation, feedback was also received through a series of discussions with sector groups (including Courtauld 2025 working groups).

Feedback was received on both the content of the guidance and how best to design the final materials to ensure they were as accessible and as relevant as possible to the intended audiences.

Tables 1 and 2 provide details of the responses to some of the key consultation questions regarding the content of the guidance.

Some of the broader feedback was that:
• The guidance should not be limited to mandatory requirements, but include other areas where changes to labelling could make a difference
• The materials need to be concise and tailored to relevant audiences
• The guidance should be structured in to discrete sections
• Summary information should be provided and hyperlinks used
• There should be more use of images and diagrams and less text
• The materials need to be more ‘visible’ and easy to make use of / accessible

\(^{14}\) See https://ec.europa.eu/food/safety/food_waste/eu_actions/date_marking_en
Table 1 – Results from the consultation relating to the guidance content and structure

<table>
<thead>
<tr>
<th>Overall, how useful do you think the Guidance will be to your organisation?</th>
<th>Not useful</th>
<th>Slightly useful</th>
<th>Moderately useful</th>
<th>Very useful</th>
<th>Extremely useful</th>
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<tr>
<td></td>
<td>0%</td>
<td>17%</td>
<td>39%</td>
<td>41%</td>
<td>2%</td>
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<table>
<thead>
<tr>
<th>Does the Guidance include all the information your organisation needs to make decisions on labelling and guidance, which help consumers reduce food waste?</th>
<th>None</th>
<th>Some</th>
<th>Most</th>
<th>All</th>
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<tr>
<td></td>
<td>0%</td>
<td>22%</td>
<td>63%</td>
<td>15%</td>
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<tr>
<th>Does the Guidance follow a logical structure?</th>
<th>No opinion</th>
<th>No</th>
<th>Yes</th>
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<td></td>
<td>7%</td>
<td>2%</td>
<td>91%</td>
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<th>Does the Guidance contain the right level of detail?</th>
<th>Insufficient detail</th>
<th>About right</th>
<th>Too much</th>
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<td></td>
<td>13%</td>
<td>83%</td>
<td>5%</td>
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<tr>
<th>How useful is the Summary, Introduction, Legal status, definitions section?</th>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
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<td></td>
<td>0%</td>
<td>8%</td>
<td>50%</td>
<td>42%</td>
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<tr>
<th>How useful is Section 1 (date labelling)?</th>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
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<td></td>
<td>0%</td>
<td>8%</td>
<td>59%</td>
<td>32%</td>
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<tr>
<th>How useful is Section 2 (setting product life)?</th>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
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<tr>
<td></td>
<td>0%</td>
<td>31%</td>
<td>51%</td>
<td>17%</td>
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<tr>
<th>How useful is Section 3 (storage guidance)?</th>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
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<tr>
<td></td>
<td>0%</td>
<td>11%</td>
<td>57%</td>
<td>31%</td>
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<tr>
<th>How useful is Section 4 (freezing guidance)?</th>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
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<tr>
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<td>0%</td>
<td>17%</td>
<td>51%</td>
<td>31%</td>
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<th>How useful is Section 5 (responsibilities through the life of a product)?</th>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
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<th>How useful is the decision trees in Annex B?</th>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
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<td>3%</td>
<td>12%</td>
<td>59%</td>
<td>26%</td>
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</table>
WRAP recommends that open-life (OL) guidance (e.g. "once opened use within x days") is only included on products for which food safety is a potential issue once the pack is opened (e.g. a jar of cooking sauce). It is not when either a) the limiting factor is quality (e.g. a loaf of bread) or b) where the food safety risk is already covered by the ‘use by’ date.

Where open-life guidance is not required from a food safety perspective, which option would you support:

<table>
<thead>
<tr>
<th>No OL</th>
<th>'Best within' OL</th>
<th>'Use within' OL</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>63%</td>
<td>31%</td>
<td>6%</td>
<td>0%</td>
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WRAP’s current recommendation to help consumers reduce food waste, is that pre-packed, uncut fresh fruit and vegetables carry a ‘best before’ (BB) date. However, some of this pre-packed produce is now sold without any date code. There is no legal requirement for one. What is your opinion?

<table>
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<tr>
<th>No BB</th>
<th>Some with BB</th>
<th>All BB</th>
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<tr>
<td>46%</td>
<td>30%</td>
<td>24%</td>
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WRAP recommends the use of more prominent symbols or logos on front of pack to convey key storage information (e.g. relating to ‘keep in the fridge’, ‘keep me in the dark’ etc.). Do you think that a commonly agreed set of symbols should be developed and used across the industry?

<table>
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<tr>
<th>Not sure</th>
<th>No</th>
<th>Yes</th>
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<tr>
<td>26%</td>
<td>15%</td>
<td>59%</td>
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As might be expected there were a range of views expressed regarding the structure and content of the guidance, which was reflected both within and between different types of respondent. In addition to the responses captured in the above Tables there was an invaluable range of suggestions for how the guidance could be improved, what other resources could be signposted and ideas for how the guidance might be disseminated and its use promoted.

The consultation and other responses were compiled and the guidance updated. With a range of views expressed it was of course not possible to accommodate the suggestions made by everyone, but the post-consultation version of the guidance was significantly enhanced as a result of the consultation exercise.

The post-consultation draft was discussed with representatives from business and redistribution organisations, and refined prior to being finalised.
Annex 1 - Q&As

1) **What are the main changes between the new guidance and the previous (2011) guidance?**

There are several differences between this new guidance and the 2011 guidance:

a) The previous guidance had a primary focus of ensuring consumers at home have safe food to eat, and that date labelling is applied in a way (by industry) that helps to reduce food waste. The scope of the new guidance is broader in that it also explicitly outlines responsibilities and actions that can be taken to help increase the amount of food surplus that can be safely redistributed.

b) The previous guidance focused primarily on date labelling, whilst the new guidance incorporates a wider set of recommendations for related food labelling – again to help reduce food waste at home and through increased redistribution. This includes advice on storage and freezing (WRAP has recommendations for these areas, but this brings all of these together in one place).

c) The new guidance is a less ‘technical’ document, but has concise explanations of what is required to comply with the regulations and clear recommendations illustrated by key facts and relevant case studies. It will be much more usable to a wider range of people in the food industry and redistribution sector.

The new guidance makes it very clear what practices are expected from industry:

- Only using ‘Use By’ where there is a food safety reason to use it. Otherwise, making use of ‘Best Before’;
- Only having one date label on a single product / item (i.e. not using ‘Display Until’ or similar);
- Maximising product ‘closed’ and ‘open’ life, giving people the longest time to use up the food;
- Only applying ‘use within x days’ open life where there is a specific safety reason not already covered by a ‘Use By’ date (‘best within x days’ could be used where open life guidance is deemed important from a food quality perspective);
- Providing clear guidance on where to store the product to maximise product life, and supporting this with effective symbols / graphics;
- Where products require or benefit from chilled storage applying consistent guidance - ‘store in the fridge below 5°C’; and
- Using the ‘snowflake’ logo to indicate where products are suitable for freezing, and ‘freeze by date mark shown’ or ‘freeze as soon as possible’ (depending on the product) and not ‘freeze on day of purchase’.

2) **Who is the guidance for, and how will it be enforced / implementation monitored?**

The guidance is primarily aimed at those who influence or design food labels, and those that make decisions based upon the information on the label (for example around making available or receiving food surplus for redistribution). There are different groups of user – including large food businesses (retailers, manufacturers and hospitality and food service), smaller food businesses of all kinds, charitable and commercial.
redistribution organisations and those involved in the enforcement of food regulations.

WRAP is working with C2025 signatories and others in the food industry to ensure these recommendations continue to be implemented (as evidenced by the publication of WRAPs Retailer Survey, 2015 good progress has been made by industry in improving labelling but more action is needed).

Progress towards implementing best practice will continue to be monitored by WRAP. Where labelling is covered by regulations (for example relating to ‘Use By’ dates), enforcement would continue to be carried out at a local level by Enforcement Officers.

3) Are there new regulations / additional mandatory requirements?
No. The work WRAP carried out with Defra and the FSA did not involve changes to any existing legislation, nor does it anticipate the introduction of new legislation/regulation. It aims to help with the interpretation of existing regulations, and within these boundaries make it clear what actions can be taken to both ensure food safety and reduce the risk of food ending up as waste.

4) Why do we need dates on food?
There is a legal requirement that most foods (there are some exceptions) require either a ‘Use By’ date or a ‘Best Before’ date.

WRAPs research and discussions with stakeholders suggests that most people prefer to have dates on pack to tell them when to consume the product rather than a product carrying no date at all. For this reason, it’s important that we continue to improve people’s understanding of what ‘Use By’ and ‘Best Before’ mean, whilst ensuring they are correctly applied by food businesses. Having ‘Best Before’ dates where possible (and safe) rather than ‘Use By’ dates gives people the flexibility to safely eat products later than the date if they choose to.

In 2010 WRAP first recommended the removal of ‘Display Until’ dates in combination with either a ‘Best Before’ or ‘Use By’ date (i.e. not having two dates on the same pack) to avoid any confusion (and the risk that food is thrown away after the earlier date). This resulted in a major shift from 40% of packs having two dates (A ‘Display Until’ date used in combination with either ‘Use By’ or ‘Best Before’) in 2009, which caused consumer confusion and the premature throwing away of food, to less than 3% in 2015.

- ‘Best Before’ dates refer to quality rather than food safety. Foods with a ‘best before’ date should be safe to eat after the ‘best before’ date, but they may no longer be at their best.
- ‘Use By’ dates refer to safety. Food can be eaten up to the end of this date but not after even if it looks and smells fine. Always follow the storage instructions on packs.
- To extend the life of food beyond its date, freeze it before the date and defrost and use within 24 hours.
'Best Before' dates are indicators of freshness and, ideally people should eat food before that point (and manage food in the home accordingly) so that it’s in as good a condition as possible when they consume it. Improving understanding of ‘Best Before’ would also mean that people would not be deterred from eating the product after that point if it is in good condition.

In other words, although you don’t need to stick to the ‘Best Before’ date, it still carries important information for the consumer about the product quality and, like the ‘Use By’ date, should be applied correctly by the manufacturer (e.g. selecting ‘Use By’ only for products where there is a food safety risk), set as long as possible, and used by the consumer to manage their food planning and consumption to minimise waste.

[FSA research\(^{15}\) suggests that almost 20% of people consider ‘Best Before’ to be an indicator of food safety, highlighting the importance of helping to improve understanding as well as making technical changes]

5) **How will changing food labels help reduce food waste – at home?**

Moving from a 'Use By' to a 'Best Before', where safe to do so, and as has been done for most hard cheeses and pasteurised fruit juices, gives people the flexibility to consume the food after the date if they haven't managed to do so before. WRAPs previous research shows that it's less likely for food to end up being wasted if it has a 'Best Before' rather than a 'Use By' date.

Similarly, moving away from ‘Freeze on day of purchase’ to ‘freeze by the date shown’ or ‘freeze as soon as possible after purchase’ (the choice of wording depends on the type of food) gives people more flexibility to freeze food that they perhaps haven't eaten when planned, before it ends up being thrown away.

6) **What are the exceptions on foods that do NOT require any form of date labelling?**

There are a number of foods specifically exempt from the EU Food Information for Consumers Regulations, including things like vinegar, cooking and table salt, solid sugar and products consisting almost solely of flavoured or coloured sugars, chewing gums and similar products, edible ices in individual portions, wine and also pre-packed uncut fresh fruit and vegetables. A full list can be found in the new guidance.

7) **Why does WRAP recommend having a ‘Best Before’ date on pre-packed uncut fresh produce if it’s not a legal requirement?**

WRAP research has shown that whilst many people don’t refer to the dates on fresh produce packs, a significant % do (particularly those with younger children). For the former having a date or not should not make a difference, but for the latter a ‘Best Before’ date provides reassurance and helps people to manage their food better (i.e. plan what to eat and when). It is also important to help people understand what ‘Best

\(^{15}\) *Food Waste PR Survey Summary findings June 2016*
Before’ dates mean, so that those people that do focus on the date don't throw food out immediately after this date is reached.

As part of the consultation WRAP asked for views on the labelling of fresh produce, and 46% of respondents thought that no fresh produce packs should carry a ‘Best Before’ date whilst 54% thought that some or all types of fresh produce should have a ‘Best Before’ date.

WRAP is working with representatives from producers and retailers to determine (based on available evidence) if this recommendation needs updating (i.e. to take dates off some or all pre-packed uncut fresh produce), with a view to re-assessing the recommendation in 2018.

8) It has been stated that eggs are an exception when it comes to date labelling, which is why they carry both a ‘Best Before’ and ‘Display Until’. Are both of these legally required?
There are specific regulations relating to hens’ eggs which require the use of ‘Best Before’ date on egg packaging, which should be fixed at not more than 28 days after laying. They must also be sold within 21 days of laying. There is no legal requirement to have a ‘Display Until’ date on eggs but this is commonly used to ensure eggs are sold within the 21 day period. An alternative coding system could be used to help prevent consumer confusion around date labelling, and bring eggs in line with other food types (where the use of two different date labels on the same pack has almost been eradicated).

9) There has been a lot in the news about (fresh pasteurised) milk moving from a ‘Use By’ to ‘Best Before’ date and people using a sniff test, what is WRAP’s take on moving milk to ‘Best Before’ and is it likely to happen?
One of the recommendations from WRAPs Retailer Survey, 2015 was for the food industry to ‘Review the choice of date mark on products that currently carry a ‘Use By’ date and which are wasted in high volumes (such as yogurts and fresh pasteurised milk). In some cases it may be feasible and safe to replace ‘Use By’ with ‘Best Before’ label, which can help reduce household food waste and waste in the supply chain’. WRAP, together with the dairy sector, retailers and the FSA are reviewing the evidence around the known food safety risks associated with fresh pasteurised milk. WRAP is also involved with an EU-funded project which looking at what date labels are used on a range of products across the EU, and the decision-making process around this. The full results from this work will be available early in 2018.

10) How much food is thrown away because of date labels?
48% (2.0 million tonnes) of avoidable household food waste (i.e. food that could have been eaten if people had acted differently, through better storage or understanding of date labels for example) occurs due to ‘not being used in time’. A date label was mentioned as the trigger for disposal for one third of such instances (around 660,000 tonnes; 16% of all avoidable food waste).
The products most often disposed of for this reason were dairy and eggs (mainly yogurt & yogurt drink and eggs) followed by drink (predominantly fruit juice and smoothies).

Of the food thrown away where a date label was cited as the reason:

- Around 30% is likely to have carried a ‘Best Before’ date (210 kt)
- Around 50% is likely to have carried a ‘Use By’ date (315 kt)
- 20% is likely to have carried a ‘Best Before’ date, but also a ‘use-by x days of opening’ (and much of what is thrown away here has been opened but not finished, such as cooking sauces, condiments etc.) (135 kt)

**11) How much food is thrown away because of fridges being set at the wrong temperature or because it’s not being frozen when it could be?**

WRAP has estimated that at least 800,000 tonnes of food is thrown away each year that could have been frozen to eat at a later date. This is associated with over 3 million tonnes of CO\textsubscript{2}e and has a value of over £2 billion.

WRAP research suggests the combined estimates for potential annual UK waste savings resulting both from lowering fridge temperature and also refrigerating foods which are predominantly stored at ambient are together worth £280 million and associated with 580,000 tonnes of CO\textsubscript{2}e emissions.

[Sainsbury's Waste Less, Save More'. Fridge thermometers were given out to 15,000 Swadlincote residents so they could find out if their fridges were set at the right temperature. Through the initiative, 74 per cent of people changed the temperature of their fridge, with 22 per cent finding their fridges were not cool enough. Half noticed a difference in the length of time food lasted in the fridge after adjusting the temperature]

**12) How will changing food labels help reduce food waste – in the supply chain / through redistribution?**

Implementation of several of the recommendations in the guidance will bring benefits to both businesses and consumers, for example:

- Only using ‘Use By’ where there is a food safety reason to use it. Otherwise, making use of ‘Best Before’
- Maximising product ‘closed’ and ‘open’ life, giving people the longest time to use up the food

Both of these result in more time for products to be sold and consumed. Foods with a ‘Use By’ cannot be redistributed or sold after that date, but food can be sold/redistributed past a ‘Best Before’ date (as long as they are of acceptable quality). Therefore having a ‘Best Before’ date gives more flexibility for consumers and food businesses / redistribution organisations to make use of food and reduce the likelihood of it being wasted.
13) **How does this new guidance help to increase the amount of food redistributed?**

The guidance contains several recommendations which will increase the likelihood of food surplus being redistributed, for example by stressing that ‘Use By’ dates should only be used on foods where there is a food safety risk. Increasing the use of ‘Best Before’ (where appropriate) is important as foods carrying this type of date can be redistributed even after the date has passed (providing they are of acceptable quality). The guidance also helps to raise awareness that this is perfectly legal, as currently not all organisations are clear about this.

There are also case studies in the guidance showing how other actions such as re-labelling food and freezing food prior to the date expiring can be taken to enable subsequent redistribution (and for both of these advice is given on how such actions should be implemented to ensure any action taken is legal and safe).

14) **Why can’t more be redistributed?**

Food businesses are doing a lot to ensure suitable food surplus is being made available for redistribution. All of the major retailers are carrying out initiatives aimed at store-level redistribution, and/or looking at how to maximise distribution from distribution centres and make it easier for their suppliers to redistribute surplus food, and many have announced plans to scale these up. Similarly many manufacturers are already providing food surplus for redistribution, and under Courtauld 2025 businesses are being encouraged to do more.

WRAPs research revealed that around 185,000 tonnes of surplus could be available for redistribution by 2025 – four-fold higher than the levels of redistribution in 2015.

For food to be suitable for redistribution is must be fit for human consumption and comply with food hygiene and safety legislation. From the WRAPs research, 40% of food that ended up as waste from retail & manufacture consisted of material that would not be considered edible, for example peelings, bones etc. Of the remaining 60% some will be ingredients or part-processed food that is not in a state that can be eaten (for example raw ingredients, under or over-baked bread), some will not meet hygiene requirements (for example food spills) and some would not be considered safe (for example foods with a ‘use by’ date that had been exposed to too high a temperature for too long, or where the packaging has been damaged and the products exposed).

As part of Courtauld 2025, business signatories including leading retailers, manufacturers, and food redistribution organisations have agreed an ambition to work collaboratively with WRAP to double the amount of surplus food they redistribute by 2020 against a 2015 baseline.
15) **Won’t this result in ‘second class’ food being given to those in need?**

This is about ensuring more good quality food that isn’t sold through the normal channels can be redistributed, either by charities or through commercial routes (for example Approved Foods sells food that is after its ‘Best Before’ date). Some food businesses already have processes in place to ensure that any food that is redistributed after its ‘Best Before’ date still meets quality standards, and WRAP and the FSA, through the Courtauld 2025 Redistribution Working Group will be helping to develop guidelines to help more businesses do the same.

[Danone gives the following guidance on its yogurts – ‘How long is the product edible after the expiry date? Like all dairy products, yogurt should preferably be eaten before the "best before" date. However, there is no danger in eating the product a few days after this date if it has been properly refrigerated. We recommend that the product not be eaten a week past the expiry date]

16) **What were the recommendations WRAP made after the 2011 Retailer Survey?**

These can be found in full in WRAPs *‘How to apply date labels to help prevent food waste’, ‘Freezing guidance to prevent food waste’* and in the *Retailer Survey, 2011* but the key ones are in brief:

- Choose the right date label to apply (‘Best Before’ where possible)
- Remove ‘Sell By’ and ‘Display Until dates when used as a second date
- Extend shelf life where possible (without reducing quality or increasing food safety risks):
  - Extend the ‘Best Before’ or ‘Use By’ date
  - Extend ‘Use within x days of opening’
- Provide clear storage guidance (specific to each product type)
- Follow FSA recommended ‘keep refrigerated below 5oC’ where fridge temperature guidance is stated on-pack
- Make it clear when foods can be frozen at home (use snowflake logo)
- Move away from ‘freeze on day of purchase’ to ‘freeze before the date shown’
- Continue to provide cooking and portioning information on-pack, and develop pack functionality that aids portioning and extends shelf life
- Continue improvements in availability of smaller pack sizes / loose variants, where appropriate. Where it is not possible to provide smaller packs, investigate how to provide guidance on optimising storage, freezing and using leftovers.

17) **Why hasn’t there been more progress in implementing the changes WRAP asked for in 2012?**

There has been considerable progress made in terms of how food products are labelled since WRAP started work in this area. For decades many foods were labelled with combinations of ‘Sell By’ or ‘Display Until’ (which are not legally required) with ‘Best Before’ or ‘Use By’ and now this is very much the exception. Similarly ‘freeze on day of purchase’ was present on virtually all foods that could be frozen at home, and now around half (and for example almost all chilled ready meals) have the new advice.
Of course there is more to do, and WRAP will be working through Courtauld 2025 and with the FSA and trade associations to encourage and enable further progress.

18) Why are there still packs on shelf that don’t follow the best practice guidance?
There has been considerable progress made in terms of how food products are labelled since WRAP started work in this area (see above Q&A), but there is more to do, and WRAP will be working through Courtauld 2025 and with the FSA and trade associations to encourage and enable further progress. Food businesses update product labelling at intervals and WRAP is working to ensure that when this takes place best practice advice is incorporated.

There will be occasions where it may be difficult or impossible to fully implement the industry guidance, for example where foods are imported from countries that export to a range of other countries which have different requirements, where UK products are exported to countries which have different requirements or where there are pack size or format constraints. For the latter there is guidance on alternative wording, where it would be difficult to include the full best practice wording on a smaller pack.

19) Is there flexibility around how the best practice referred to in the guidance is implemented?
There will be occasions where it may be difficult to implement the full best practice guidance, for example where there are pack size or format constraints. The most important principle is to provide clear on-pack advice that helps people maintain their food in a safe and fresh condition, and avoid wasting it. Following the best practice guidance wherever possible will provide people with more consistent messaging wherever they buy their food, and across different food types. This, combined with effective communications around food storage and labelling, will make it easier for people to understand what actions they can take to reduce food waste.

20) Why are you introducing another label (the little blue fridge) – aren’t there enough labels already on pack to confuse people?
People respond well to visual icons and these can help support written advice. They are particularly useful when unpacking after shopping as storage information is often on the back of the pack.

The little blue fridge isn’t necessary for every product, but it will be very useful for products like many pre-packed fruit and vegetables, which are usually sold at ambient temperatures but benefit from being kept in the fridge. Apples can stay fresh for up to two weeks longer in the fridge than in a fruit bowl and when people do store their fruit and vegetables in the fridge, they waste less of it.

The same principle applies for using the snowflake icon front of pack – people can easily see that a product can be frozen at home, giving them more options to use the food up at a later date.
As part of the consultation on the guidance the following was asked: ‘WRAP recommends the use of more prominent symbols or logos on front of pack to convey key storage information (e.g. relating to ‘keep in the fridge’, ‘keep me in the dark’ etc.). Do you think that a commonly agreed set of symbols should be developed and used across the industry?’ Almost 60% of replies were positive, compared to 15% that disagreed (and 26% ‘not sure’).

21) **If best practice is to make use of ‘At home store in the fridge below 5°C’ why isn’t this (necessarily) followed in stores?**

It is important to note that the advice on refrigeration referred to above relates to the information on pack that is targeted at consumers, and how they should store the product once in their home. Retailers and caterers in England, Wales and Northern Ireland are legally required to ensure that refrigerated food is stored at or below 8°C (in Scotland there is no set limit but such foods must still be kept in a refrigerator, a refrigerated chamber or a cool ventilated place), rather than the 5°C advised for domestic fridges.

In addition some foods that benefit from being stored in the fridge at home may be stored at ambient temperature in store (where they are likely to have a quick turnover). Further advice on the temperature rules can be found in the Food Standards Agency’s temperature control guide which covers requirements throughout the UK.

Different foods may be stored at different temperatures in the supply chain for good reason (for optimal shelf-life / quality), but most consumers will only have one fridge, and giving consistent advice on what that temperature should be could significantly reduce food waste and the risk of food borne illness. WRAP and other research has shown that up to 70% of domestic fridges are operating at higher than recommended temperatures.

22) **What is WRAP asking retailers and manufacturers to do now?**

WRAP is calling on retailers and manufacturers to:

- Review the choice of date label on products that currently carry a ‘Use By’ date and which are wasted in high volumes (such as yogurts and fresh milk). In some cases it may be feasible and safe to replace ‘Use By’ with ‘Best Before’ label, which can help reduce household food waste and waste in the supply chain
- Review and where possible extend the shelf-life given to consumers, both when ‘closed’ (i.e. before opening) and ‘open’ (i.e. after opening) on products wasted in large volumes (such as fresh meat, milk and pre-prepared foods)
- Continue to implement WRAP/FSA Guidance on refrigeration and freezing advice, across all products that can be frozen at home, including maintaining or reinstating use of the snowflake logo
Review the availability and relative pricing of smaller packs/split packs for products that are wasted in high volumes and primarily due to not being used in time (bread being a priority)

23) Examples are given for how freezing surplus food prior to the ‘Use By’ date passing can be done to help enable it to be redistributed. What guidance is there on how to do this to comply with the law?
This is covered in some detail in the guidance (and it is recommended that those considering freezing food for subsequent redistribution read this), but in brief, the organisation carrying out the freezing must:

- ensure that the food is in an acceptable condition and suitable for freezing (e.g. as indicated by manufacturer’s instructions);
- ensure the food is frozen all of the way through to the core. For food carrying a ‘Use By’ date, demonstrate that the freezing process commenced early enough to ensure that the food is frozen at midnight of the day of the expiry of the ‘Use By’ date. Ideally, the freezing process should commence early enough so that the food reaches at least -2°C at midnight of the day of the expiry of the ‘Use By’ date. While the food may not be fully frozen at midnight, there should be no risk to food safety if the freezing process is underway early enough before that time.
- supply information relating to the food and its freezing to the receiving organisation – include information about when the product was frozen and instructions for defrosting and cooking. Instructions for use should be provided which make it clear that the product should be thawed under refrigeration and used within 24 hours.
- re-label the food. If food is frozen to facilitate redistribution, it is essential that the food is re-labelled as the nature of the product will have changed, and frozen food with an expired ‘Use By’ date found in a food business establishment is deemed unsafe by virtue of food law. Therefore, food has to be frozen prior to its expiry date, the original ‘Use By’ (if the product had one) removed and a new ‘Best Before’ date applied. Food operations storing re-labelled food should have systems in place to record when the food was frozen as they could be asked to demonstrate that such food is safe when inspected by local authority food safety officers.

24) When will WRAP next report on progress in implementing best practice labelling?
WRAP have carried out three major market reviews since 2008, which have revealed where progress has been made (e.g. simplification of date labelling to move away from 40% of packs having two dates, which caused consumer confusion to less than 3%; two high-volume products (hard cheese and pasteurised fruit juice) moving away from ‘Use By’ to ‘Best Before’ dates; around half of packs moving away from ‘freeze on day of purchase’ advice) and where more action is needed.

WRAP (and others) have and will be carrying out store visits and working with food businesses to track change. A more ‘structured’ assessment is likely to report in 2019 (to coincide with the first Courtauld 2025 milestone). WRAP will also be reporting on household food waste levels, and the amounts of food being redistributed in the UK in 2019.
25) Is it true that WRAP has only been talking to food businesses about this new guidance?
No, a variety of food redistribution organisations (both charitable and commercial), consumer groups and those involved in enforcement have been involved in the development of the guidance, and many types of organisation provided input through the consultation.

26) How did WRAP ensure other organisations had the opportunity to influence the guidance?
Prior to developing a draft of the new guidance, WRAP consulted with a range of stakeholders, from business and those involved with the redistribution of surplus food. This took place through existing Courtauld 2025 Working Groups and dedicated meetings and a webinar. A series of key principles were agreed, based on the above discussions and learnings from the development of, and feedback on, the 2011 guidance.

A draft version of the guidance was developed by WRAP, FSA and Defra Labelling, and refined through discussions with representatives from both businesses and redistribution organisations. A consultation was launched with a press release in July 2017 (see Annex 2), seeking input from a wide range of individuals and organisations, which received significant coverage in the mainstream and trade press. WRAP, FSA and Defra also made use of a range of other channels to ensure there was a high level of awareness of the consultation. A draft of the guidance was available to download, and a survey enabled respondents to provide both structured and freeform input (see Annex 3).

More than 60 responses were received, from a mixture of retailers, manufacturers, hospitality and food service businesses, trade associations, redistribution organisations, those involved in enforcement, academics and consumer / campaign groups. In parallel to the consultation feedback was also received through a series of discussions with sector groups (including Courtauld 2025 Working Groups).

The consultation and other responses were compiled and the guidance updated. With a range of views expressed it was of course not possible to accommodate the suggestions made by everyone, but the post-consultation version of the guidance was significantly enhanced as a result of the consultation exercise.

Feedback was received on both the content of the guidance and how best to design the final materials to ensure they were as accessible and as relevant as possible to the intended audiences (for example through the use of discrete sections and more imagery and less text).

The post-consultation draft was discussed with representatives from business and redistribution organisations, and refined prior to being finalised.

27) Will WRAP publish all of the consultation responses?
WRAP has published a short summary of the consultation responses, but will not publish the individual responses.
28) **What is being done in light of the recommendations from the EFRA Committee report?**

The report concludes:

*We recommend that the incoming Government continues the current review with WRAP and the Food Standards Agency on food date labelling, with a view to issuing guidance to industry by the end of 2017. The review should specifically look at whether there is a need for ‘best before’ dates at all*

WRAP, working with FSA and Defra Labelling, have published updated guidance covering best practice on food date labelling and storage advice. The development of the guidance involved extensive consultation with a wide range of organisations.

There is a legal requirement that most foods (there are some exceptions) require either a 'Use By' date (where there is a food safety risk if the food is consumed after the date) or a 'Best Before' date (to indicate the point after which the food may not be at its best quality). WRAP is looking at whether its current recommendation that pre-packed uncut fresh produce should have a ‘Best Before’ date (where there is no legal requirement but having a date may help reduce food waste in store and in the home) should be updated.

WRAP is also engaged with the European Commission in discussions on whether the list of products exempt from the requirement to carry any date label should be extended.

[The Government response to the EFRA report has now been published, and states 'We welcome the Committee's recognition of the review on date labelling and related advice. Defra will continue to work with others to further reduce household food waste and remove the barriers to increased redistribution, for example through charity organisations. This review will produce updated guidance that will stress the primary importance of food safety, explain clearly what the different date labels mean and how to decide what date to use, and explain what can and cannot be done as the date approaches or is passed. It will also include refreshed guidance on storage, including fridge temperatures and freezing and defrosting advice. Defra and the Food Standards Agency have been working closely with WRAP, who are currently consulting on this guidance.

Food labelling legislation is currently harmonised at EU level. It requires consumers to be given a ‘use by’ date where this is needed for food safety reasons, and a ‘best before’ date where there is not an immediate food safety issue. A number of food types are exempt from these requirements because by their nature, they do not deteriorate, do so very slowly, or their deterioration is obvious and apparent to a potential consumer. There has been some discussion with Member States and the Commission on expanding the list of exempted products. Exit from the EU will give us the possibility to independently act on this and other opportunities. In the meantime, we are active in international discussions on date marking, such as the Codex standards for food and agricultural products, where we will also seek to safeguard exemptions where it is not necessary to have mandatory date labelling'.]

29) **Does this [WRAP publishing guidance to industry] mean WRAP is taking responsibility for food safety / food legislation as well as food waste?**

No, there are no changes to the responsibilities for food labelling legislation, nor the legislation itself. WRAP is working with FSA and Defra, as we have in the past, to provide businesses and others with guidance on how best to label products (within the bounds of current legislation where relevant) to reduce the risk of food products being wasted.
This is similar to the work WRAP has done previously to advise industry on date and freezing guidance (see http://www.wrap.org.uk/sites/files/wrap/Info%20Sheet%20Date%20Labels%20final.pdf and http://www.wrap.org.uk/sites/files/wrap/Info%20Sheet%20Freezing%20final.pdf)

Food labelling legislation is harmonised at an EU level. In England, responsibility for food labelling legislation and policy is split across Defra, the Food Standards Agency (FSA) and the Department of Health (DH). General food labelling policy responsibilities (where this is not related to food safety) in England lie with Defra, whilst responsibility for nutrition labelling policy sits with DH.

For Scotland, Wales and Northern Ireland all domestic standards legislation is the responsibility of the FSA.

The FSA is responsible for food safety and food hygiene across the UK. It works with local authorities to enforce food safety regulations and its staff work in UK meat plants to check the standards are being met.

The FSA also has responsibility for labelling policy in Scotland, Wales and Northern Ireland, and for nutrition policy in Scotland and Northern Ireland. Responsibility for nutrition policy in Wales lies with the Welsh Government.

30) Why is WRAP carrying out research/asking a lot of questions about date labelling across Europe?
WRAP is a partner in a major EU-funded project called Refresh, which is ‘taking action against food waste. 26 partners from 12 European countries and China work towards the project's goal to contribute towards Sustainable Development Goal 12.3 of halving per capita food waste at the retail and consumer level and reducing food losses along production and supply chains, reducing waste management costs, and maximizing the value from un-avoidable food waste and packaging materials’.

As part of this project research is being carried out to understand more about how to help consumers reduce food waste at home, including through optimising food labelling (date labels, storage and freezing guidance). Research carried out in the UK over the last 10 years has been invaluable in formulating recommendations and stimulating innovation aimed at reducing waste. Having insights from consumers in different EU countries will help achieve the ambitions of the Refresh project.

31) What is the EU currently discussing around date labels?
The Commission is considering possible options to simplify date marking on foodstuffs:

- Extending the list of foods which are exempt from the obligation to include a "best before" date in food labelling (as specified in Annex X of Regulation (EU) No 1169/2011). Today these include foods such as vinegar, sugar or salt. In the
future, other non-perishable foods for which removal of date marking would not pose a safety concern could be also included in the list.

- Modification of the terminology used for "best before" labelling, especially if there is evidence that alternate wording is better understood and more useful to consumers.

The Commission is currently exploring these options with both public authorities in EU Member States and actors in the food supply chain and consumers (see here).

WRAP is involved in research to inform the above discussions.

32) **Isn’t there research from other countries that suggests date labels should be changed/removed?**
There is an increasing amount of research looking at the link between date labelling and food waste, and how date labelling might be improved. There are recent examples from the Netherlands and Sweden for example. This research suggests there is potential to reduce food waste through changing the type of label on longer life foods for example, by removing the ‘best before’ date and stating that the product has a ‘long life’. However, further research is needed on this and WRAP and the European Commission will continue to review the available evidence.

33) **Can’t the UK follow the US (USDA) lead here and simplify labelling?**
The USDA has consulted on a proposal to introduce more consistency around food date labelling because labelling requirements are more disparate than in the UK and EU as rules vary by State. USDA recognises that ‘the use of different phrases to describe quality dates has caused consumer confusion and has led to the disposal of food that is otherwise wholesome and safe because it is past the date printed on the package’

The current approach in the UK (and EU) requires consumers to be given guidance on food safety where this is needed (through the ‘Use By’ date) and food quality (‘Best Before’) where there is not a food safety issue.


34) **How does the Consumer Goods Forum Call to Action on date labels affect the UK?**
The Consumer Goods Forum (CGF) – a network of 400 of the biggest consumer goods companies across 70 countries – along with Champions 12.3 has approved a Call to Action to standardize food date labels worldwide by 2020.
The Call to Action says retailers and food producers should take three important steps to simplify date labels and reduce food waste by 2020:

- Only one label at a time
Choice of two labels: one expiration date for perishable items (e.g., “Use by”) and one food quality indicator for non-perishable items (e.g., “Best if used by”). The exact wording will be tailored to regional context.

Consumer education to better understand what date labels mean.

Work by WRAP and others in the UK helped inform the CGF Call to Action, and the UK is referred to as an example of good practice in regard to date labelling. The best practice outlined in the WRAP/FSA/Defra Guidance is entirely consistent with the CGF Call to Action.

35) **Doesn’t this new ‘colour dot’ that Sainsbury’s is using (Insignia trial on sliced ham) mean that date labels can be removed?**

There is a legal requirement that most foods (there are some exceptions) require either a ‘Use By’ date (where there is a food safety risk if the food is consumed after the date) or a ‘Best Before’ date (to indicate the point after which the food may not be at its best quality), and without a change in the regulations technological innovations such as ‘time/temperature’ indicators cannot replace a date label. What this indicator does allow is a clear indication to consumers of whether the open pack of ham is still OK to eat – the colour changes depending on both the time the pack has been open and the temperature the pack has been exposed to (in and out of the fridge). It may also help to reinforce to people the importance of checking and if necessary adjusting their fridge temperature.
WRAP begins consultation on updating industry guidance for date labels and related consumer advice

6th July 2017

As announced in February, WRAP is currently working with UK Governments and the Food Standards Agency (FSA) to update industry guidance on the application of on-pack date and related advice (storage and freezing guidance).

This guidance aims to assist further reductions in food waste at home and remove key barriers to redistribution. The guidance will cover:

- What the different date labels mean, and how best to decide which date to apply in relation to curtailing food waste (and the consequences of this decision)
- The importance of maximising both ‘closed’ and ‘open’ life, whilst ensuring quality and safety are maintained
- The importance of correct storage guidance, including fridge temperature and freezing advice
- What can (and cannot) be done as the date approaches / is passed (for sale / redistribution)

A draft of the updated guidance is now available for review and comment until August 3rd 2017.

WRAP is also directly consulting with food businesses, trade bodies, redistribution organisations and others, including through various Courtauld Commitment 2025 Working Groups.

We expect to publish the completed guidance later in 2017.

Environment Minister, Thérèse Coffey said: “The food and catering industries have made strong progress in reducing household food waste by a million tonnes since 2007, but there is still a way to go. We know that confusing labels can contribute to food waste by suggesting items need to be thrown away sooner than is necessary, which is why this new guidance will make packaging much clearer for people as they do their weekly shop.”
## Annex 3 – Consultation Questions

**WRAP / FSA / DEFRA Labelling Consultation**

Your details and overall feedback on guidance

This section is to understand some details about you (which will be kept confidential) and to get your view on the guidance overall

* 1. Name

* 2. Job Title

* 3. Name of organisation

* 4. Nature of organisation
   - Food retailer
   - Trade body
   - Food manufacturer
   - Redistribution organisation
   - Local Authority
   - Other (please specify)

5. Size of organisation (number of employees)

6. Overall, how useful do you think the Guidance will be to your organisation?

<table>
<thead>
<tr>
<th>Not useful</th>
<th>Slightly useful</th>
<th>Moderately useful</th>
<th>Very useful</th>
<th>Extremely useful</th>
</tr>
</thead>
</table>

Please describe why it was or wasn't useful here:

7. Does the Guidance include all the information your organisation needs to make decisions on labelling and guidance, which help consumers reduce food waste?

<table>
<thead>
<tr>
<th>None of the information</th>
<th>Some of the information</th>
<th>Most of the information</th>
<th>All of the information</th>
</tr>
</thead>
</table>

Please provide any other comments
8. Does the Guidance follow a logical structure?
- Yes
- No
- No opinion

If no, please provide suggestions for improvement:

9. Does the Guidance contain the right level of detail?
- Insufficient detail
- About right
- Too much detail

Any other comments:

10. Should this Guidance document reference other guidance, case studies or resources? (Please provide details/links and highlight if you would be interested in providing additional case studies).

Any other comments:
WRAP / FSA / DEFRA Labelling Consultation

Guidance Contents

On this page, each section of the Guidance is listed, so you can feedback on each of the sections individually. For each section, there is space for you to select an answer with your view on its usefulness, as well as free text boxes, where you can provide more detailed input.

11. How useful is the Summary, Introduction, Legal status, definitions section?

<table>
<thead>
<tr>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
</tr>
</thead>
</table>

Please provide comments

12. How useful is Section 1 (date labelling)?

<table>
<thead>
<tr>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
</tr>
</thead>
</table>

Please provide comments

13. How useful is Section 2 (setting product life)?

<table>
<thead>
<tr>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
</tr>
</thead>
</table>

Please provide comments

14. How useful is Section 3 (storage guidance)?

<table>
<thead>
<tr>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
</tr>
</thead>
</table>

Please provide comments

15. How useful is Section 4 (freezing guidance)?

<table>
<thead>
<tr>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
</tr>
</thead>
</table>

Please provide comments
16. How useful is Section 5 (responsibilities through the life of a product)?

<table>
<thead>
<tr>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
</tr>
</thead>
</table>

Please provide comments

17. How useful is the decision trees in Annex B?

<table>
<thead>
<tr>
<th>Not useful</th>
<th>Somewhat useful</th>
<th>Fairly useful</th>
<th>Extremely useful</th>
</tr>
</thead>
</table>

Please provide comments

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Guidance Recommendations

On this page, we would like your input into some of the recommendations currently contained in the guidance.

18. WRAP recommends that open-life guidance (e.g. “once opened use within x days”) is only included on products for which food safety is a potential issue once the pack is opened (e.g. a jar of cooking sauce). It is not when either a) the limiting factor is quality (e.g. a loaf of bread) or b) where the food safety risk is already covered by the ‘use by’ date.

Where open-life guidance is not required from a food safety perspective, which option would you support:

- Not having any open-life guidance on date labels, where open life is not required for food safety reasons
- Having once opened best within x days on date labels, where it open life is not required for food safety reasons
- Having once opened use within x days on date labels, where it open life is not required for food safety reasons
- Other

If other (please specify). Or use this space to provide any comments to support your answer.
19. WRAP’s current recommendation to help consumers reduce food waste, is that pre-packed, uncut fresh fruit and vegetables carry a ‘best before’ date. However, some of this pre-packed produce is now sold without any date code. There is no legal requirement for one. What is your opinion?

- No fresh produce should use Best Before
- Some fresh produce should use Best Before
- All fresh produce should use Best Before

Please explain your choice above and what labels you think should be used. If you are aware of any research or insights to help inform the review of this recommendation please state here.

20. WRAP recommends the use of more prominent symbols or logos on front of pack to convey key storage information (e.g. relating to ‘keep in the fridge’, ‘keep me in the dark’ etc.). Do you think that a commonly agreed set of symbols should be developed and used across the industry?

- Yes
- No
- Not sure

If yes, please list the symbols you think would be most useful:

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Guidance Format and Dissemination

On this final page, there is an opportunity to feedback on what the guidance might look like, how it could become widely adopted, and what additional resources would help.

21. This Guidance will be designed to be clear and easy-to-use. We plan to make it available as a downloadable PDF. Are there any design, layout or other features that you think would help make the Guidance easier for people to use and implement?

- Yes
- No
- Not sure

If yes, please provide details of your suggestions below:

22. In addition to a downloadable PDF, are there other resources and Guidance that would be useful in order for you to implement this guidance in your organisation?

- Yes
- No
23. Please select up to three other resources and guidance that would be most useful in order for you to implement this guidance in your organisation
- Checklists
- Product category-specific guides
- Visual guides and examples
- Posters
- Video guidance
- Apps
- Please list other useful resources

24. Please can you let us know of good examples of existing guidance that could be used as a model for the new Guidance.

25. Which elements of the Guidance will be most relevant and useful to your sector/organisation? (This is to help design tailored materials for different sectors).

26. What do you think are the best ways of promoting the new Guidance?

27. If your organisation is able to help with the promotion of the Guidance, please state what it could do so below (e.g. what communications channels does your organisation have?)

28. In your view, what could be done to ensure that the recommendations in the Guidance are implemented?

29. If you have any other comments, please add these below.

30. If you are willing for WRAP to contact you to discuss any of your feedback in more detail, please check the box below.
- Yes, I would be happy to be contacted by WRAP to discuss my comments on the guidance
WRAP’s vision is a world in which resources are used sustainably.

Our mission is to accelerate the move to a sustainable resource-efficient economy through re-inventing how we design, produce and sell products; re-thinking how we use and consume products; and re-defining what is possible through re-use and recycling.

Find out more at www.wrap.org.uk