



Removing packaging from uncut fresh produce

A policy recommendation for the UK, developed by WRAP in consultation with members of The Courtauld 2030 Commitment and the UK Plastics Pact.

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1.0 Executive Summary

Addressing food and packaging waste is imperative in creating a zero-waste economy and achieving sustainability goals. In the UK, 70% of all edible post farm-gate food waste comes from people's homes, with fresh fruit and vegetables accounting for the largest proportion. In addition, the majority of fresh fruit and vegetables are packed using single-use plastic. While progress has been made in the UK and globally towards reducing food and plastic packaging waste, challenges persist, particularly in the context of packaging and household food waste associated with fresh produce.

Households across the UK struggle to buy the right amount of fresh fruit and vegetables because of how most of these products are sold, resulting in wasted money and food. WRAP's evidence shows that selling apples, bananas and potatoes loose could prevent 8 million shopping baskets worth of food going to waste (having the added benefit of eliminating around 1,100 rubbish trucks of avoidable plastic every year). This can be achieved by enabling people to buy closer to their needs.

To address food waste effectively through the removal of packaging from fresh produce, a comprehensive approach involving both voluntary agreements and government interventions will be crucial. Through "The Pathway to Selling More Uncut Fresh Fruit and Vegetables Loose", which has interim targets in place to 2030 and annual reporting on progress via the UK Plastics Pact, WRAP is working with industry to increase the amount of fresh produce sold loose. Specific work has included mapping of supply chain processes and in-store trials including consumer messaging.

WRAP and industry partners have identified several significant barriers to delivering on the ambitions of the Pathway and as such, policy interventions have been raised as an important requirement to overcoming these barriers, creating a level playing field for industry and providing a supportive legislative and regulatory landscape to realise ambitions to sell loose. WRAP partnered with cross-party think tank, Policy Connect, to explore the kinds of formal policy interventions that could enable industry to go further and faster toward achieving this ambition, than voluntary approaches alone.

During 2024, WRAP and Policy Connect, held a series of workshops with industry (including major UK retailers, fresh produce supply chain and trade bodies) and government stakeholders, exploring different policy mechanisms against success criteria consistent with the Green Book. These included: bans and restrictions,

mandatory targets, taxes and charges and incentives and subsidies. WRAP now recommends that the UK government consider restricting packaging on whole, uncut fresh fruit and vegetables sold in retail in the UK.

WRAP is recommending the government implement a phased approach, starting with banning primary packaging on the 21 products already identified in WRAP's 'The Pathway to Selling More Uncut Fresh Fruit and Vegetables Loose' ('The Pathway'). The workshops also identified details on timeframes, exemptions and other considerations, including supporting mechanisms, as part of such a ban and the details of those can be found in section 5 and 6 of this paper.

Selling these 21 items loose has the potential to save approximately 100,000 tonnes of edible fruit and vegetables from being wasted annually in people's homes – this is equivalent to 10,800 waste trucks or nearly 14million shopping baskets - as well as saving 13,000 tonnes of single use plastic film.

List of items identified in 'The Pathway'

Apples	Garlic	Parsnips
Aubergines	Ginger	Pears
Avocados	Lemons	Peppers
Bananas	Limes	Potatoes
Broccoli	Mangos	Squash
Cabbages	Onions	Swede
Carrots	Oranges	Salad Tomatoes

2.0 Why is this a problem?

Food and packaging waste are global challenges requiring urgent action. Food waste feeds climate change: globally up to 40% of food produced ends up as waste, representing 8–10% of all greenhouse gas (GHG) emissions¹. In the UK, over 70% of edible post-farmgate food waste in the UK happens in the home, with fresh fruit and vegetables accounting for the largest proportion². Of the £4bn worth of fresh fruit and vegetables thrown away in our homes each year, many are discarded before they are even prepared or cooked³.

Meanwhile most fruit and vegetables are packed using single-use plastic (around 70,000 tonnes of it each year). While plastic packaging is a resource-efficient material, its ability to escape into the environment is evident on a global level, with plastic pollution impacting the health of waterways and marine environments across the planet. And the production of virgin plastics is highly energy intensive and heavily reliant on the extraction of finite fossil fuel feedstocks, exacerbating climate change and further pushing us towards breaching the safe planetary boundaries. We need to remove unnecessary plastic. The answer is not to simply switch from one packaging material to another since all materials have an environmental impact.

In February 2022, WRAP published important research⁴ which investigated the relationship between plastic packaging and uncut, fresh produce. The research highlighted significant potential to reduce food waste in homes and reduce plastic packaging, enabling people to buy only what they need by increasing the amount of fresh produce items sold loose. If all apples, bananas and potatoes were sold loose, 60,000 tonnes of food waste could be saved by enabling people to buy what they need, and plastic packaging use reduced by 8,800 tonnes per year. Combined, this represents a saving of more than 80,000 tonnes of CO₂e. Whilst the study focused on five of the most commonly wasted fruit and veg, there are many more products to which this would also be applicable. Fresh fruit and vegetables make up more household food waste, by weight, than any other food type. Almost 1.7 million tonnes of edible fruit and vegetables are thrown away each year, costing citizens £4 billion.

¹ [UNEP Food Waste Index Report 2021 | UNEP - UN Environment Programme](#)

² [Food Surplus and Waste in the UK Key Facts - updated November 2023 | WRAP](#)

³ [WRAP-Household-Food-and-Drink-Waste-in-the-United-Kingdom-2021-22-v6.1.pdf](#)

⁴ [Reducing household food waste and plastic packaging | WRAP](#)



Removing primary packaging from fresh produce enables people to buy what they will use, saving household food waste, reducing unnecessary single use packaging and the associated carbon emissions.

3.0 Why is policy needed?

The Pathway to selling more uncut fresh fruit and vegetables loose, developed by WRAP in 2023, in consultation with industry, sets out a voluntary approach with the aim that 50% of volume will be sold loose by 2030. However, making this change is not without its challenges. Supply chains have been optimised to sell fresh produce packaged and people have become accustomed to buying it that way.

UK consumers say they are motivated to buy loose with over three in five (64%) saying that they would prefer buying fresh produce loose if it were available, and a similar number agreeing that they would buy more produce loose if it was available at their supermarket. However, the retailers experience is that when loose is available, consumers are still opting for pre-packaged items. Retailers can help bridge this intention-action gap by promoting buying loose, but to create a level playing field and drive change at scale effective policy is needed. WRAP's research suggests that people would be in support of this with over half of people agreeing that the UK government should implement stricter policies to reduce food waste.

Policy interventions have also been identified by industry as an essential requirement to overcoming barriers, creating a clear signal and level playing field for industry and providing a supportive legislative and regulatory landscape to realise ambitions to sell loose. It is clear without a policy intervention; the industry will not be able to change at the scale required.

A precedent does exist for policy being implemented to drive change, albeit mainly focused on packaging. In the UK, policy could build on legislation such as The Environmental Protection (Plastic Straws, Cotton Buds and Stirrers) (England) Regulations 2020, and The United Kingdom Internal Market Act 2020 (Exclusions from Market Access Principles: Single-use Plastics) Regulations 2022. The UK can also learn from international experience and demonstrate international leadership by implementing policies that support a zero-waste economy by reducing packaging and household food waste. In Europe currently around 50% of fresh produce is sold loose⁵, compared with around 19% in the UK⁶.

Measures introduced in other countries include:

⁵ Freshfel (12 March 2024) Compromise on the new EU Packaging law will lead to unprecedented, grievous effects on the functioning of the Single Market <https://freshfel.org/compromise-on-the-new-eu-packaging-law-will-lead-to-unprecedented-grievous-effects-on-the-functioning-of-the-single-market-and-dramatically-damage-fresh-produce-consumption/>

⁶ The UK Plastics Pact Annual Report 2022-23 <https://www.wrap.ngo/resources/report/uk-plastics-pact-annual-report-2022-23>



- bans and restrictions on certain single-use plastics, such as plastic bags, straws, and utensils⁷ which are seen around the world
- the specific relationship between packaging and fresh produce food waste has also been recognised in policy activity in France. In 2022, France implemented a ban on single-use plastic packaging for fruits and vegetables, under the "Anti-Waste for a Circular Economy" law
- as of March 2024, the EU has agreed that the Packaging and Packaging Waste Regulation (PPWR) will include a ban on 'single use plastic packaging format for unprocessed fresh fruit and vegetables'⁸.

⁷ WEF (26 October 2020) As Canada bans bags and more, this is what's happening with single-use plastics around the world <https://www.weforum.org/agenda/2020/10/canada-bans-single-use-plastics/>

⁸ European Parliament (4 March 2024) Deal on new rules for more sustainable packaging in the EU <https://www.europarl.europa.eu/news/en/press-room/20240301IPR18595/deal-on-new-rules-for-more-sustainable-packaging-in-the-eu>

4.0 What commitments does this policy support?

As well as supporting families in a cost-of-living crisis and reducing greenhouse gas emissions, the policy would support several specific commitments.

Removal of packaging from fresh produce supports the targets of The UK Plastics Pact, driving circularity for plastic packaging. Key to this is the target to eliminate problematic and unnecessary plastic by 2025. Most of the packaging for fresh fruit and veg is a specific material: PP and PE film. This material, whilst technically recyclable, is not collected by most local authorities and is not being effectively recycled at scale. It is also a material that does not easily incorporate recycled content in its production due to current limitations in regulatory frameworks and a lack of large-scale capacity within the domestic recycling infrastructure.

Selling more fresh produce loose also supports the UK commitment to UN Sustainable Development Goal 12.3, which aims to halve global food waste per capita at retail and consumer level, as well as several key commitments made by the industry. The Courtauld Commitment 2030 aims to halve food waste and its associated GHG impacts by 2030, and the WWF Basket which aims to halve the environmental impact of UK shopping baskets by 2030, including reducing primary plastic packaging by 40% and food loss and waste by 50%.

5.0 Policy Recommendation

WRAP worked with cross-party think tank, Policy Connect, to explore the kinds of policy interventions that could enable industry to go further and faster than voluntary approaches alone toward achieving this ambition.

While various policy mechanisms were assessed by an industry group, and the details of introducing mandatory targets were considered, overall the members of Courtauld 2030 and the UK Plastics pact concluded that, in order to achieve the level playing field and the degree of consumer behaviour change needed to realise the ambition of removing packaging from uncut fruit and vegetables in the UK, a ban (with some additional considerations) would be the most effective mechanism.

Based on this assessment with and input from suppliers, retail and government stakeholders, WRAP is therefore recommending that the government implement this for the UK, in the form of a packaging ban with the following considerations:

1. The ban should be on primary packaging for whole, uncut fresh produce items sold in amounts less than 1.5kg and introduced in phases.
2. Phase 1 of the ban should be on the 21 items listed in section 2.2 of [The Pathway](#); these have already been identified by industry as the less problematic product lines to start with and all are already being sold loose by at least one retailer. They also represent some of the most highly wasted items in people homes.

List of items identified in 'The Pathway'

Apples	Garlic	Parsnips
Aubergines	Ginger	Pears
Avocados	Lemons	Peppers
Bananas	Limes	Potatoes
Broccoli	Mangos	Squash
Cabbages	Onions	Swede
Carrots	Oranges	Salad Tomatoes

3. Phase 1 should be in force by 2030 (to align with PPWR timeframes).

4. Continued and enhanced investment into voluntary action resulting in learnings leading up to 2027, with legislation on a ban being introduced with at least a 3-year lead time.
5. A period of grace for plastic stock depletion should be considered post implementation (e.g. 6 months).
6. There should be some exemptions to Phase 1. These should include:
 - a. organic and Fairtrade items where a PLU sticker is not feasible. It is important to differentiate these items for certification
 - b. 'Ripe and Ready' SKUs as these are more prone to damage
 - c. certain times of year where bulk buying is common (e.g. Christmas period)
 - d. seasonal shoulders where products could be more easily damaged
 - e. exceptional circumstances e.g. biosecurity, crop flushes, world events, natural disasters which may mean temporary packaging is required on certain items
 - f. specific store formats including smaller format stores (with a square footage threshold to be agreed with industry) where sell through of items may be slower and therefore could increase waste.
7. Phase 2 would need to be defined via further consultation with industry but should include an evolution of Phase 1 where the scope of products sold loose increases.
8. If Phase 2 was to be a ban on packaging across all uncut fresh produce items further exemptions should include:
 - a. all exemptions of Phase 1
 - b. berries and soft fruits
 - c. herbs
 - d. small fresh produce items e.g. peas
 - e. products that require some degree of processing for pest control e.g. corn from certain countries



- f. Where packaging has proven to significantly extend shelf life and reduce waste overall from farm to fork.

By addressing the concerns and considerations raised by industry stakeholders, policymakers can develop effective and equitable policies that drive meaningful progress towards the removal of packaging from fresh produce.

6.0 Further Considerations

A variety of opportunities and challenges associated with the introduction and delivery of restrictions and bans have been identified and assessed through the desk-review and in discussion with industry.

The following recommendations are suggested to improve the effectiveness of a ban:

1. Consider financial mechanisms to support this transition for example:
 - allowing sufficient lead time on the introduction of a ban with the financial lifecycle of machinery used in packing in mind
 - offering a buy-back or repurposing scheme for machinery that would become redundant
 - providing subsidies to support farmers, growers, and supply chain innovations.
2. Support the preparation for businesses and consumers by:
 - clear and early communication to consumers and businesses
 - continued and enhanced support for initiatives and campaigns that encourage consumers to buy loose so people are encouraged to buy a wide range of healthy fruit and vegetables in appropriate amounts
 - provide clear guidance on the provision of fresh produce bags.
3. Filling evidence gaps for example, research into the impact of loose on food waste and plastic waste across the whole value chain:
 - increases in secondary (such as boxes and containers) and tertiary packaging (for example pallets and large shipping containers) are likely and in general, this packaging is easier to control than primary and easier to ensure it is recycled correctly. Likewise, food waste increases in supply chain and retail are likely at least initially as industry adapts, but any increases in either plastics or food waste would need to be monitored and managed.
4. Consider this regulation in respect to other legislation already in force:

- Country of Origin labelling requirement – consider reviewing these as currently the requirements within this legislation make the provision of loose more difficult to manage
- Weight and Measures Act – consider a review and update of this legislation to include extending the “Countable Produce” list as well as an increase in the max weight of fresh produce bags for items sold as gross weight.

Additionally, ensuring challenges around implementation across the four nations in the UK, including taking into consideration the Windsor Framework, are considered and harmonising regulations and learning from international experiences will be essential for maximising the impact of any policy intervention.

Overall, the provision of financial support was considered by industry to be a valuable and necessary component to ensure the effectiveness of implementing a policy intervention such as a ban, to support businesses to make the required investment in infrastructure, ensure a level-playing field for SMEs, and promote research and development of new systems and processes.

7.0 Next Steps

The imperative to address food and packaging waste and to move towards a more circular economy is clear, with significant environmental, economic, and social benefits. While progress has been made, challenges persist, especially concerning fresh produce packaging and household food waste.

The introduction of a packaging ban on whole, uncut fresh produce offers a strategic approach to curbing packaging waste and encouraging sustainable consumer behaviour. However, its successful implementation requires careful planning, stakeholder engagement, and support mechanisms.

To maximise the impact of this policy intervention, collaboration between industry, policymakers, and other stakeholders will be essential. WRAP is prioritising working with government to achieve this. To take forward the proposal the following steps would be required:

- formal consultation on a ban on primary packaging of whole fresh uncut produce to address points made in sections 5 and 6 of this paper
- perform an economic assessment of the impact of a packaging ban on specific fruit and vegetable items, across the whole value chain
- support the ongoing development of supply chain and retail solutions for loose fresh produce, as well as initiatives and campaigns to prepare and increase shopper awareness of the benefits and acceptance of buying more loose fresh fruit and vegetables, resulting in greater demand for loose.

About WRAP

WRAP is a global environmental action NGO transforming our product and food systems to create Circular Living. We examine sustainability challenges through the lens of people's day-to-day lives. We transform the systems that provide the products we consume. We catalyse action from policy makers, businesses, NGOs and citizens to make it happen.

Document reference

(please use this reference when citing WRAP's work)

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