

# Consultation: Version 2 of WRAP Scope 3 GHG Measurement and Reporting Protocols

This consultation seeks views from the food and drink sector on how WRAP proposes to update the Scope 3 Green House Gas Measurement and Reporting Protocols for Food and Drink businesses (referred to as ('Protocols')). Since WRAP's Protocols were published in May 2022, new guidance documents have been released and/or updated, with implications for how businesses should account and set targets for emissions in the UK food and drink sector. Therefore, we are creating Version 2 (V2) of the Protocols.

An outline of the key proposed changes to V2 of the Protocols is provided in the 'Supporting Summary Document', which is available to download alongside the full V2 Protocols draft on WRAP's consultation webpage (<https://wrap.org.uk/GHGconsultation>).

The consultation survey is **formed of two parts**. Part 1 seeks feedback on the **usability of the protocols** and part 2 seeks **technical feedback** on the interpretation of the Greenhouse Gas Protocol's Land Sector and Removals Guidance and Science Based Target Initiative's Forest Land Use and Agriculture guidance.

You **do not need to answer all questions** and can skip if you are unsure / unable to give an informed answer.

\*Please note - page numbers are based on the PDF page numbers\*

This survey should take around 20 minutes (excluding time taken to read the protocols) and you are able to save and edit responses. A full preview of the survey is also available on the consultation webpage.

## Data consent

Are you happy for anonymised data to be shared with Defra?

1. Do you consent for your responses to be shared with Defra and external analysts in an anonymised format? Defra will use the data as part of the evaluation of the Food Data Transparency Partnership, and may publish the content of your response to this consultation **without** identifying details. \*

Yes

No

## Respondent details

Who do you represent?

2. What is your name? \*

3. What is your email address? \*

4. What is your company name? \*

5. What is your job role? \*

6. Please tell us who you are responding as, selecting from the following:

\*

- Business
- Government / Policy / Regulation / Standards
- NGO / Charity / Non-profit
- Consultancy
- Tech provider
- Trade / membership body
- Academia / research
- Other

7. If you are a business, please tell us what sector you are responding from: \*

N/A

Manufacturing

Hospitality and Food Service

Retail

Wholesale

Producer

Beverages

Other

## Use of the protocols to date

This section asks questions about how your company has interacted with the Protocols to date and what the intended use of the Protocols is going forwards

8. Are you aware of WRAP's Protocols? \*

Yes

No

9. Has your organisation previously used WRAP's Protocols? \*

Yes

No

Not applicable

10. For what purpose did you use the Protocols? Please select all that apply. \*

- Internal upskilling
- Conducting a first scope 3 footprint
- Sense checking current approach
- Gaining greater alignment with the rest of the sector
- Setting a target
- Monitoring
- Reporting
- Consultancy work
- Other

11. How helpful was V1 of the Protocols for each purpose?

	Very helpful	Somewhat helpful	Neither helpful or unhelpful	Somewhat unhelpful	Very unhelpful
Internal upskilling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Conducting a first scope 3 footprint	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sense checking current approach	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gaining greater alignment with the rest of the sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Setting a target	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Monitoring	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reporting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consultancy work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

12. Does your organisation intend to use the Protocols to inform its processes during the next measurement and reporting cycle for GHG?

- Yes
- No
- Not applicable



13. Is your organisation implementing actions to reduce scope 3 emissions?

- Yes
- No
- Not applicable
- Don't know

14. How confident were you in reporting your organisation's scope 3 emissions **before** reading through the V2 protocols?

1 being very unconfident, 5 being very confident

1	2	3	4	5
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Very unconfident

Very confident

15. How confident were you in reporting your organisation's scope 3 **after** reading through the V2 protocols?

1 being very unconfident, 5 being very confident

1	2	3	4	5
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Very unconfident

Very confident

16. Which elements of the V2 Protocols changed your confidence levels?

This could mean a increase or decrease in confidence after reading the V2 protocols

## Usability of the protocols

This section asks questions about the usability of WRAP's Scope 3 Green House Gas (GHG) Measurement and Reporting Protocols for Food and Drink businesses (hereafter referred to as 'Protocols'). Please read V2 Protocols before proceeding.

(Link to V2 of the Protocols <https://wrap.org.uk/GHGconsultation>)

17. If you have already conducted a scope 3 report of your organisation, how relevant or useful was the V2 protocols for this situation?

18. Overall, how useful are the top tips and case studies added throughout the V2 Protocols?

1 being not useful, 5 being very useful

1	2	3	4	5
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Not useful

Very useful

19. Which of the case studies/top tips in the protocols, if any, are most useful and why?

20. Do you have any feedback on the section 'Initial steer for primary producers', including any resources you would highlight and if the information present would be useful to your organisation? (see page 13)

21. Table 2 in section 1 lists further sources of guidance and support, is there any sector guidance you feel we have missed from this table? (see page 14)

22. To what extent do you agree or disagree that there is enough clarity and guidance given as to when transport emissions would fall under category 4 (upstream transportation and distribution) (see pages 33-35)

1	2	3	4	5
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Strongly Disagree

Strongly Agree

23. To what extent do you agree or disagree that there is enough clarity and guidance given as to when transport emissions would fall under category 9 (downstream transportation and distribution) (see pages 33-35)

1	2	3	4	5
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Strongly Disagree

Strongly Agree

24. Please add any notes to supplement your answers to questions 22 & 23 here:

25. To what extent do you agree or disagree that there are enough examples of emissions which fall under each category for you to feel confident categorising your own organisation's emissions?

1	2	3	4	5
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Strongly Disagree

Strongly Agree

26. Please add any notes to supplement your answer to the above question here. In particular, If you disagree, please provide more detail on what could be expanded on.

27. To what extent do you agree or disagree that it is clear that Table 6 is a guide only, and that an organisation's own knowledge of significant scope 3 categories should supersede the recommended minimum categories (see page 33-34)

1	2	3	4	5
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Strongly Disagree

Strongly Agree

28. Please add any notes to supplement your answer to the above question here:

29. If you represent the wholesale sector, do you agree with the categories highlighted as significant in Table 6 (see page 33-34)

1	2	3	4	5
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Strongly Disagree

Strongly Agree

30. Please add any notes to supplement your answer to the above question here:

31. To what extent do you agree or disagree that it is clear throughout these protocols that category 1 purchased goods should be a company's main focus when measuring and reporting scope 3 emissions?

1	2	3	4	5
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Strongly Disagree

Strongly Agree

32. Overall, how satisfied are you that there is enough explanation of data hierarchy for activity data and its importance? (see page 55)

1	2	3	4	5
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Very dissatisfied

Very satisfied

33. To what extent do you agree or disagree that there is enough clarity on why food redistribution emissions cannot be included as reductions and instead are categorised as 'avoided emissions' (see page 84)

1	2	3	4	5
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Strongly Disagree

Strongly Agree

34. Please provide any comments on the usability of the Protocol, including suggestions on how we could improve it.

## Technical Feedback

This section covers the more technical aspects of WRAP's Scope 3 Green House Gas (GHG) Measurement and Reporting Protocols for Food and Drink businesses (hereafter referred to as 'Protocols'). Please read V2 Protocols before proceeding.

(Link to V2 of the Protocols <https://wrap.org.uk/GHGconsultation>)

35. The use of the latest GWP100 values is strongly recommended rather than required due to the difficulty of getting these values in some cases. To what extent do you agree or disagree with this approach?

1	2	3	4	5
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Strongly Disagree

Strongly Agree

36. Please add any notes to supplement your answer to the above question here:

37. Indirect use-phase emissions are optional under GHG Protocol Scope 3 Standard and SBTi target-setting criteria, and don't count towards the coverage requirements for SBTi targets. As such, businesses can decide whether to include these sources of emissions within their inventory based on their specific business goals and so we have included this as a recommendation rather than a requirement in the protocols. To what extent do you agree or disagree with this approach?

1	2	3	4	5
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Strongly Disagree

Strongly Agree

38. Please add any notes to supplement your answer to the above question here:

39. To what extent do you agree or disagree that 'Table 9: Hierarchy of data sources for LUC accounting' makes clear the order of preference/recommendation for data types related to land use and change? (see page 44)

1	2	3	4	5
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Strongly Disagree

Strongly Agree

40. Please add any notes to supplement your answer to the above question here, including whether you agree with the order:

41. Proposed recommendation: LUC methods disclosure (for detail see pages 38-49): LUC emissions shall be reported separately. The following information for the basis of these emissions calculations shall be reported: the scope of commodities and LUC covered; the calculation approach; the spatial granularity of the analysis; if and how results have been adjusted to reflect the use of certification. To what extent do you agree or disagree with this approach?

1	2	3	4	5
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Strongly Disagree

Strongly Agree



42. Please add any notes to supplement your answer to the above question here:

43. Until further updates to the Greenhouse Gas Protocols Land Sector and Removals Guidance, it is recommended within this protocol that businesses should use equal discounting and product expansion allocation approaches where possible as we felt this aligns with the most commonly used approach in emission factors, then migrate to linear discounting when GHGP LSRG is finalised in 2024 if this is the recommendation of that standard. To what extent do you agree or disagree with this approach? (for detail see pages 38-49)

1	2	3	4	5
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Strongly Disagree

Strongly Agree

44. Please add any notes to supplement your answer to the above question here:

45. Proposed recommendation: LUC reduction claims in target year: Although businesses can start estimating LUC emissions with country-level sLUC emissions factors, they should not use this data for assessing LUC emissions reductions in their FLAG target year. This should be achieved through the use of more accurate sub-national or land management unit-level sourcing and dLUC data. To what extent do you agree with this approach? (for detail see pages 38-49)

1	2	3	4	5
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Strongly Disagree

Strongly Agree

46. Please add any notes to supplement your answer to the above question here:

47. Proposed recommendation: Use of certification: Certification can only 'zero out' LUC emissions where the certification scheme has following characteristics: It has a cut-off date that is more than 20 years before the reporting year (i.e., 2003 for a 2023 inventory); It uses segregated or identity preserved chain of custody models; It addresses all forms of conversion – including both legal and illegal. To what extent do you agree or disagree with this approach? (for detail see pages 38-49)

1	2	3	4	5
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Strongly Disagree

Strongly Agree

48. Please add any notes to supplement your answer to the above question here:

49. The protocols recommend: Companies should align with the principles for removals accounting as stated in the Greenhouse Gas Protocol's Land Sector and Removals Guidance when including carbon removals in corporate GHG inventory reporting. This includes the recommendation to use primary empirical data, have traceability and sufficient monitoring is in place to ensure that removals are not reversed. To what extent do you agree or disagree that this should be a recommendation? If you disagree could you please make it clear in the free text section as to whether this is because you think it should be a requirement or other? (for detail see pages 38-49)

1	2	3	4	5
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Strongly Disagree

Strongly Agree

50. Please add any notes to supplement your answer to the above question here:

51. Proposed recommendation: Removals methods disclosure: If companies report carbon removals in their GHG inventory they shall disclose the level of traceability, primary data and approach to monitoring being used. To what extent do you agree or disagree with this approach? (for detail see pages 38-49)

1	2	3	4	5
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Strongly Disagree

Strongly Agree

52. Please add any notes to supplement your answer to the above question here:

53. Proposed recommendation: Generic sequestration factors: Companies shall not use generic sequestration factors (i.e., those found in LCA databases, industry average data, ) to report removals in their GHG inventory. To what extent do you agree or disagree with this approach? (for detail see pages 38-49)

1	2	3	4	5
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Strongly Disagree

Strongly Agree

54. Please add any notes to supplement your answer to the above question here:



55. To what extent do you agree or disagree with the Data Quality Score (see pages 67-69)?

1	2	3	4	5
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Strongly Disagree

Strongly Agree

56. Please add any notes to supplement your answer to the above question here:

57. Do you have any further feedback?

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