



David Pencheon  
NHS Sustainable Development Unit

21 August 2008

Dear David

**Response by Sustain: the alliance for better food and farming, to the consultation  
SAVING CARBON, IMPROVING HEALTH:  
A DRAFT CARBON REDUCTION STRATEGY FOR THE NHS IN ENGLAND**

Thank you for the opportunity for Sustain to respond to this consultation. As you know, Sustain is the alliance for better food and farming. We advocate food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. Information on our work is available at [www.sustainweb.org](http://www.sustainweb.org).

Sustain would normally consult its membership prior to submitting a consultation response but, given our remit, we shall restrict our comments on this consultation to general principles about reducing the greenhouse gases generated by food production and consumption in the NHS, in the context of sustainable development. Since these principles are integral to our routine work with our members, a consultation about general principles would be redundant.

*1. Remit of the consultation document*

- Carbon reduction, although vital, is only one part of sustainable development

We subscribe to the widely held view that the three elements of sustainable development – economic, environmental and social – are inextricably intertwined and that it is neither possible nor desirable to deal with them separately. Thus, although we understand the desire to focus on reducing carbon as a means of tackling climate change, we are clear that this must be done in the context of efforts to tackle sustainable development as a whole. Unless this is clear and explicit from the outset, there is a danger of inadvertently encouraging perverse outcomes.

For example, the intensive chicken industry is making much of the fact that, gramme for gramme, intensively reared chicken has been calculated to produce lower quantities of greenhouse gases, compared to beef, lamb and pork. This is for a number of reasons, including the following:

- Cows and sheep, being ruminant animals, produce large quantities of methane, a potent greenhouse gas not produced by non-ruminants such as chickens;
- Intensively reared chickens usually only live for around 40 days<sup>1</sup> before being slaughtered and have grown very rapidly during that period, so do not consume as much feed as longer living animals and convert it relatively efficiently into meat.

However, if these factors led the NHS to buy proportionately more intensively reared chicken in its food procurement contracts, the following perverse effects are likely:

- Increased damage to the environment. This results from intensively produced animal feed, particularly soya, which is often grown in poorer countries on previously forested land<sup>2</sup>. Deforestation not only releases huge quantities of carbon dioxide into the atmosphere but also removes an invaluable carbon sink. The production of animal feed itself generates the powerful greenhouse gas, nitrous oxide, from the artificial fertilizer used to grow it. Moreover, forest destruction contributes to the loss of biodiversity.
- Increased risks to health. In tropical areas, where much soya is grown, some of the biodiversity lost or put at risk could have vital therapeutic uses. More directly, evidence is growing that intensive poultry production is linked to the development and spread of the H5N1 strain of avian influenza<sup>3</sup>. In addition, intensive poultry production is not possible without routine use of antibiotics. Evidence has been accumulating since at least the first UK Government commissioned review, the Netherthorpe Report in 1962, that this is contributing to the spread of antibiotic resistance in humans. Most recently, agricultural use of antibiotics has been linked to the spread of “superbugs”<sup>4</sup>.
- Reduced animal welfare. The shocking conditions in which chickens are raised intensively have been highlighted recently in a range of media by Hugh Fearnley-Whittingstall and Jamie Oliver, among others, and need no rehearsal here. Public support for their campaigns reconfirms that the majority of people continue to prefer high welfare standards for farm animals.

We hope that none of these effects would be considered acceptable by people working in the NHS if there were a narrow focus solely on reducing carbon. However, we reiterate our view that, unless sustainable development is integrated, from the start, into carbon reduction efforts, these and other unexpected and negative results are likely.

**Recommendation: Efforts to reduce carbon in the NHS should be integrated explicitly and immediately into a commitment simultaneously to contribute to sustainable development as a whole.**

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<sup>1</sup> Information from Compassion in World Farming  
[http://www.ciwf.org.uk/farm\\_animals/poultry/meat\\_chickens/default.aspx](http://www.ciwf.org.uk/farm_animals/poultry/meat_chickens/default.aspx)

<sup>2</sup> Greenpeace (2006) *Eating up the Amazon*.  
<http://www.greenpeace.org/international/press/reports/eating-up-the-amazon>

<sup>3</sup> Michael Gregor (2006) *Bird flu: A virus of our own hatching*. Lantern Books, New York. See also [www.birdflubook.com](http://www.birdflubook.com)

<sup>4</sup> Richard Young (2008) *Are superbugs spreading on food?* The Food Magazine, issue 82, July/September 2008.

- Carbon dioxide is only one of several greenhouse gases

Food production and consumption contributes significantly to greenhouse gas emission. It is estimated that the food chain accounts for around one-fifth of total UK greenhouse gas emissions measured in terms of consumption<sup>5</sup>. European estimates are even more dramatic, placing the contribution of EU food consumption at just under a third of total emissions<sup>6</sup>. However, unlike in other sectors such as energy and transport, a very large proportion of the greenhouses gases are not carbon dioxide, but also include methane (mainly from ruminant livestock) and nitrous oxide, associated with artificial fertiliser used in all crops (not just animal feed) apart from organically grown crops (where no artificial fertiliser is permitted).

Thus, if the NHS is asked to focus solely on carbon it will appear that food is a negligible contributor to a carbon reduction target whereas, in fact, changing the type of food provided in the NHS could make a major contribution not only to reducing greenhouses gases, but also to improving several other elements of sustainable development. These include patient satisfaction, staff skills and development, and local economic regeneration.

These benefits have been demonstrated by a number of projects, including Sustain's Good Food on the Public Plate project<sup>7</sup>. This has worked for a number of years with several hospitals in London and the South East, and is expanding its remit to work with care homes, universities, local authorities and others in the public sector, all of which are keen to increase the proportion of sustainable food they offer to their staff and service users. At various stages in the project there have been evaluations of the indirect health impact<sup>8</sup>, the economic impact<sup>9</sup>, and the effects of the project, overall<sup>10</sup>. All of these have concluded that increasing the proportion of sustainable food provided is popular with staff and hospital patients, improves awareness and appreciation of the importance of food for health and sustainability, and generates valuable extra business for local companies involved in producing and/or distributing sustainable food.

**Recommendation: Efforts to reduce carbon in the NHS should be accompanied by simultaneous efforts to reduce greenhouse gases overall.**

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<sup>5</sup> Tara Garnett (2007), *Overall UK consumption related GHGs*, Food Climate Research Network, [Online]. Available: [www.fcrn.org.uk/frcnResearch/publications/Overall%20food%20GHGs.doc](http://www.fcrn.org.uk/frcnResearch/publications/Overall%20food%20GHGs.doc), (accessed 15<sup>th</sup> May 2008). This paper is a work in progress which attempts to quantify the contribution of food consumption in the UK to its total consumption emissions of greenhouse gases.

<sup>6</sup> European Science and Technology Observatory and Institute for Prospective Technological studies (2006), *Environmental impact of products: Analysis of the life cycle environmental impacts related to the total final consumption of the EU25*, full report, [Online]. Available: <http://ec.europa.eu/environment/ipp/identifying.htm> (accessed 15th May 2008)

<sup>7</sup> See Good Food on the Public Plate webpage - <http://www.sustainweb.org/page.php?id=83>

<sup>8</sup> Health Evaluation Summary - <http://www.sustainweb.org/page.php?id=102>

<sup>9</sup> Economic Evaluation Summary - <http://www.sustainweb.org/page.php?id=103>

<sup>10</sup> Good Food on the Public Plate Evaluation Report - [http://www.sustainweb.org/pdf/GFPP\\_Eval\\_2008.pdf](http://www.sustainweb.org/pdf/GFPP_Eval_2008.pdf)

2. *Will the measures proposed help the NHS combat climate change and contribute to sustainable development?*

The consultation document was, of course, issued before the Cabinet Office report on food<sup>11</sup>. A major recommendation in the report was that a Healthy Food Mark be developed to promote healthy and sustainable food in the public sector. The recommendation was based on powerful arguments demonstrating the importance of government leadership in this area. Most notably it states,

*“Action across the whole of the public sector, rather than in a piecemeal way, could create a powerful demand-side lever...”*

This is in recognition of the £2billion or so that is spent each year on food in the public sector. It also argues, convincingly, that

*“...the volume and complexity of guidance, case material and best practice contributes to confusion...”*

It is therefore extremely disappointing that the Healthy Food Mark will not be compulsory, but will instead contribute to the confusing plethora of voluntary guidance already available. Worse, even if the Mark becomes compulsory by 2012 (following a period of review), it is proposed that it should apply only to central government, their agencies, and prisons. Thus it is conceivable that prisoners might get healthier and more sustainable food than hospital patients, school children and elderly residents of care homes. We can see no justification for this.

The considerable experience of Sustain and its extensive membership has already developed a set of guidelines for sustainable food<sup>12</sup>. That same experience shows that the voluntary approaches proposed in the NHS consultation document, the Cabinet Office report and elsewhere, do not work quickly enough, or on a sufficiently large scale.

In contrast, the Netherlands government has recently set a target for 100% of central government public procurement (including, but not limited to, food) to be from sustainable sources by 2010<sup>13</sup>. This ambition matches the scale of the health and environmental problems we are facing.

**Recommendation: The NHS should follow the example of the Netherlands government and set obligatory and ambitious targets so that all the food it serves, to patients, staff or visitors, is sustainable within a few years.**

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<sup>11</sup> Cabinet Office Strategy Unit (2008) *Food Matters: Towards a strategy for the 21<sup>st</sup> century*. HMSO: London. [www.cabinetoffice.gov.uk/strategy/work\\_areas/food\\_policy.aspx](http://www.cabinetoffice.gov.uk/strategy/work_areas/food_policy.aspx)

<sup>12</sup> Seven principles of sustainable food - <http://www.sustainweb.org/sustainablefood/>

<sup>13</sup> Details of the Netherlands public procurement commitment form part of its wider ethical policy development, reported in detail at: [http://ec.europa.eu/employment\\_social/emplweb/csr-matrix/csr\\_countryfiche\\_en.cfm?id=31](http://ec.europa.eu/employment_social/emplweb/csr-matrix/csr_countryfiche_en.cfm?id=31)

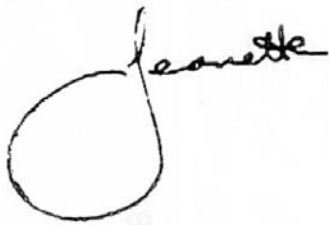
3. *What more is needed to help the NHS combat climate change and contribute to sustainable development?*

A number of valuable lessons have been learned in the course of the five years that the Good Food on the Public Plate project has been running, and developing links with others doing similar work across the country and, indeed, in mainland Europe<sup>14</sup>, and North America<sup>15</sup>:

- Funding is needed for the kind of practical help this and other similar projects offer, but this funding will not be needed indefinitely. Once potential purchasers and suppliers have been “matched” and any practical problems ironed out, the systems established should continue to work.
- Conflicting policy signals need to be tackled. It is not helpful on the one hand to extol the virtues of sustainable food in the public sector, and on the other insist on budget cuts. While sustainable food is not inevitably more expensive, it will certainly not be cheaper.
- All hospitals should have the equipment and trained staff to be able to cook food from scratch. Without these facilities there is no flexibility to allow for the changes needed to increase the proportion of sustainable food. This has implications for both existing and planned NHS hospital buildings, since many of the former have recently been constructed without kitchens.
- Investment is needed to ensure that a wide variety of sustainable food is available everywhere in the country, and that the transport and distribution infrastructure is adequate.
- Vigorous and imaginative marketing is needed to support the efforts of those who are already promoting more sustainable food in hospitals, and to convince more people that the obligatory approach is more than justified.

Please do not hesitate to contact Sustain if you would like any more information on any of the issues discussed in this paper. We look forward to hearing how the NHS intends to make rapid progress in this vital area as soon as possible.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jeanette', written over a large, stylized circular flourish.

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<sup>14</sup> See Mensa Civica: The European Alliance for Sustainable Public Food Systems, run by AlimenTerra - <http://www.alimenterra.org/>

<sup>15</sup> See the work done in Ontario by Local Food Plus – [www.localfoodplus.ca](http://www.localfoodplus.ca)