

February 2025

Sustain representation to the Spending Review 2025 - Phase 2

Sustain is a powerful alliance of organisations and communities working together for a better system of food and farming, and cultivating the movement for change. Our alliance comprises over 100 organisations.

In this submission, we focus on considerations for HM Treasury in three main areas:

- Health
- Education
- Environment and Rural Affairs

Health

Expand use of financial incentives for a healthier food and drink industry (HM Treasury, Department for Health and Social Care [DHSC], Department for Environment Food and Rural Affairs [DEFRA])

Recommendation:

- Issue a joint HM Treasury, Department for Health and Social Care and Department for Environment, Food and Rural Affairs **call for evidence on measures to incentivise healthier food and drink production** beyond the Soft Drinks Industry Levy, including further financial levers.

The business case for change

Poor population health is increasingly damaging our economy, reducing our participation in the workforce and our productivity, and increasing the need for medical and welfare support.

- The total economic impact of obesity and overweight in the UK is estimated to be £98 billion per year.¹ To make our health and care services sustainable, the government has committed to a 'prevention first' revolution, with healthy weight

and obesity rightly identified as a key focus for action in the cross-government Health Mission.

- Four of the top five risk factors are related to diet.² High salt consumption is strongly associated with high blood pressure – increasing risk of major conditions such as stroke (by 23%) and cardiovascular disease (by 14%)³, and sugar consumption is also linked with various chronic health conditions such as type 2 diabetes and musculoskeletal ill-health, and a range of cancers.⁴
- The Soft Drinks Industry Levy (SDIL) has proven effective at driving reformulation, with an overall sales-weighted average reduction of sugar of 46%⁵. However, voluntary food reformulation programmes have lagged behind, with average sugar reduction of just 3.5%, signalling the need for stronger measures⁶.
- Despite the changes driven by SDIL, the soft drinks industry has thrived, with the total volume of soft drinks sold rising by 21.3% between 2015 and 2020.⁷ A similar sugar and salt levy for the broader food industry could stimulate innovation, encouraging manufacturers to develop healthier products and alternatives.
- New evidence from the Recipe for Change campaign looking at the sugar and salt content of cakes, biscuits, chocolate and savoury snacks, shows substantial variation in salt and sugar levels between similar products. Many products are missing the voluntary targets, highlighting the opportunity for further reformulation in these categories.⁸

With current voluntary reformulation targets due to expire by December 2025, the government needs to set out what approach it wants to take to speed up progress and which other levers could now be deployed. Both the Health Mission and the announcement of a new Food Strategy provide key opportunities for HM Treasury to play a catalytic role in using financial incentives and penalties, building on the success of the SDIL.

The detailed submission by the Recipe for Change coalition presents evidence that an industry-wide levy on salt and sugar could help prevent up to two million cases of disease over 25 years, with potential gains of 3.7 million quality-adjusted life years (QALYs), worth £77.9 billion in overall value to society.⁹ Even a targeted application of this to biscuits, cakes, confectionery and desserts could prevent up to 800,000 cases of food-related ill health, worth £23 billion.¹⁰

Research from the National Food Strategy also estimates that an industry-wide levy could generate £2.9bn to £3.4bn annually for HM Treasury.¹¹ These funds could be reinvested in public health initiatives, supporting the 'prevention first' agenda. Specifically, this could support initiatives focused on children's health and access to good food. The Recipe for Change coalition outlines various initiatives that could provide excellent value for money if funded by these revenues.

Public support for government action is strong.

- Nationwide public polling conducted by YouGov in 2024 revealed that only 13% of the British public believe food companies will improve their products without government intervention, while 68% support expanding SDIL-style levies to other food products, as long as the revenue supports children's health.¹²
- These measures align with recommendations from the Lords' Select Committee on Food, Diet and Obesity, the National Food Strategy, IPPR, and the Times Health Commission. Many leading food companies and investors also call for government action.¹³

A call for evidence would enable complementary approaches to be explored by the Government, and send a clear signal to the food industry about moving beyond voluntary programmes and align all relevant areas of government around this evidence.

For a more detailed analysis, as well as the key criteria that the campaign believes should be applied if implementing a levy, see the full Recipe for Change submission.

Invest in Healthy Start (Department for Health and Social Care)

Recommendations:

- **Increase the Healthy Start allowance from £8.50 to £10.60 a week for infants and from £4.25 to £5.30 a week for pregnant women and children aged 1-4 years old and commit to keeping value of payments under review in line with further inflation**, and to align with Best Start in Scotland. (As per LGA analysis¹⁴)
- **Invest in expansion of Healthy Start programme to reach children up to the age of 5** (i.e. inclusion of pre-school children aged 4) in order to close the gap between support from Healthy Start and access to Universal Infant Free School Meals (UIFSM).
- **Invest in expanding eligibility for Healthy Start to all eligible pregnant women and families with babies and children in receipt of Universal Credit** (or equivalent in legacy benefits in final stage of UC rollout).
- **Support work between DHSC and DWP to facilitate auto-enrolment processes** to ensure all eligible recipients receive their Healthy Start entitlements.
- **Ensure budgets also account for permanent eligibility on equivalent terms to families under the No Recourse To Public Funds.**

The case for investment

Families with children are more likely to experience food insecurity. Our member The Food Foundation surveys found that almost 1 in 4 (23.6%) of households with a child under the age of 4 were experiencing food insecurity in January 2024.¹⁵

The Government has set out to create the healthiest generation of children, to protect the NHS and shift from treatment to prevention. All evidence indicates that nutrition and health in the first 5 years of life will have a profound impact on later life course. However, lack of affordability and access to healthy food is contributing to health inequalities that are also increasing pressure on health services: almost a quarter (24%) of 5-year-olds have dental decay, with 2.5 times as many children in the most deprived fifth affected compared with the least deprived fifth.¹⁶ The Government's own National Child Monitoring Programme reveals that children from households in the most deprived communities in England are twice as likely to be at risk of obesity, overweight and future diet related disease, compared to those living in the least deprived areas.¹⁷

Therefore, investment in interventions that support healthy nutrition in early years as a critical contribution to the nation's future health. The Healthy Start scheme provides a vital nutritional safety net for pregnant women and families with babies and children under 4. It helps establish healthier eating of fresh fruit and vegetables in the critical pre-school years, giving children a better start for entering reception and embracing healthy school meals and access to the school fruit and vegetable scheme. It also supports our horticulture sector by increasing low income family spending on fruit and vegetables.

- Independent research shows increased spending on fruit and vegetables by 15% by families in receipt of Healthy Start payments, equivalent to an additional 1.8kg of fruit and vegetables per month, or 22 portions.¹⁸
- Research also reveals positive benefits reported by interviews with Healthy Start recipients, local authorities and third sector organisations in positively supporting impacted household finances and improving what families are eating.¹⁹

However, the Healthy Start scheme is not meeting its potential, and has so far failed to meet a target of 75% uptake of the programme for those eligible under current thresholds. Awareness of Healthy Start remains low, and the application process is complex. It is failing to reach millions of families and children living in poverty.

- Sustain analysis estimates that families are missing out on £58 million of free fruit, veg and milk, due to low uptake of the scheme, which sat at just 62.4% in 2024, against a target of 75% set by the government. Funding for the scheme has declined to less than a third of what it was a decade ago, a loss of over £90m.²⁰
- To support all eligible families to take up their Healthy Start entitlement, we urge the relevant departments to work on a process of auto-registration for Healthy Start payments as part of the overall support package offered to pregnant women and families with children under 5. We believe that technical solutions to achieve this are possible within a digital payment scheme.

Furthermore, the weekly value of the payments is no longer sufficient to cover the cost of infant formula, and has fallen far behind the support provided in Scotland via the equivalent Best Start payment.

- Since 2009, the scheme has only been updated once, from £3.20 to £4.25 in April 2021. It has not been updated in the past 4 years despite significant increases in the cost of food and other weekly bills for families on low budgets.
- According to analysis by our member First Steps Nutrition Trust²¹, between March 2021 and April 2023, the seven standard, powdered, first infant formulas sold by the market leaders increased in cost by an average of 24% - and the only 'own brand' infant formula increased by 45%. Since then, and following investigation by the Competition and Markets Authority, there have been some moves by some manufacturers and retailers to reduce the prices of some products, but the value of Healthy Start payments still remains insufficient. Further analysis published in November 2024 revealed that only five first infant formula products were affordable within a week's Healthy Start payment for families with an infant under one years old.²²
- Research by Sustain member the Food Foundation also revealed large variation in prices across nine major retailers, despite products being nutritionally equivalent.²³
- The Food Foundation has estimated the cost of increasing the value of weekly payments to £5.30 per week (£10.60 for babies under 12 months) to be approximately **£184m per year** (based on current eligibility).²⁴

Finally, current eligibility criteria do not reach all women and families living in poverty, and urgently need to be revised, with budgets aligned with supporting all those who need it most.

- The Food Foundation estimates that expanding Healthy Start to include all families in receipt of Universal Credit to require an additional **£244m per year**.

Restore and increase public health funding

Recommendation:

- The Government should restore the public-health grant to at least 2015/16 levels increasing public health investment by £1 billion per year with a commitment to ensuring the grant keeps pace with growth in NHS England's spending in the longer term.

The case for investment

Public health services are critical for improving the population's health and reducing health inequalities. Investment by the Government in public health can relieve pressure on other services such as the NHS by helping to prevent or delay disease. This funding enables local authorities to deliver vital preventative and treatment

services, including many that contribute to healthy weight, such as early-years interventions and weight-management services.

The announcement on 7 February 2025 of an increase of 3% in real terms from 2024/25 is very welcome. However, it is still 26% smaller in real terms per person than in 2015/16.^{25 26} Public health interventions provide three to four times better value for money in extending years of good health, compared to the costs of NHS interventions treating preventable illnesses.¹⁸ Local authorities need stable funding arrangements that enable them to carry out the long-term planning and investment needed in this policy space.

Education

Healthy School Food For All (Department for Education)

Recommendations:

- HM Treasury should announce a joint initiative with the Department of Education, DHSC and DEFRA as part of the new Food Strategy to **review funding systems on school food** to ensure (a) **a thriving procurement and catering sector**, providing decent jobs and job security, whilst serving up nutritious food that is procured in line with government health and sustainability standards and targets and (b) to set a long-term vision of and establishing a longer-term roadmap towards **healthy, sustainable school food for all** children from nursery to sixth form.
- As an immediate first step, the Government should commit to **expanding free school meals to children in state-funded schools from families in receipt of Universal Credit or equivalent benefits**. We estimate that this would require additional funding for school meals by £500 million per year to ensure all children currently living in poverty can access a healthy lunch at school.
- The Treasury should support work across the Department for Work and Pensions and the Department of Education to implement **an automated opt-out enrolment system** in order to ensure eligible children then are able to access school meals without further stigma or barriers, and that schools are able to claim pupil premium for all children eligible for Free School Meals (FSM) and provide additional learning support. As these pupils are currently eligible for FSM, government should already be making provision for this funding to be claimed.
- HM Treasury and the Department for Education must **set budgets that ensure adequate per meal funding levels for school meals services in light of recent inflation levels**. Adjusting the per meal rate would support jobs in this crucial employment sector, and enable schools, caterers and local authorities to meet quality and nutritional standards.

- To ensure that over £1.4 billion of taxpayer money invested in free school meals is delivering nutritious meals in line with school food standards, the Government ensure adequate resources are made available to DfE and local authorities to deliver **an effective compliance monitoring system**.
- The Government must maintain **a multi-year funding arrangement for the National School Breakfast Programme** to continue operating during the transition period to national primary school breakfast club provision, and maintain support in secondary schools meeting the eligibility criteria.
- The Government should set out **a multi-year commitment to maintaining the Holiday Activities and Food Programme**, to ensure best use of resources and effective planning and delivery by local authorities and their partners.

The case for investment

The new Government has set out to create the 'healthiest ever generation of children', including establishing a cross-departmental Health Mission and a new strategy to address Child Poverty. As the government prepares a new food strategy, it has the opportunity to build on the independent National Food Strategy which recommended expansion of healthy, nutritious school meals.

All the evidence shows that providing hot, nutritious lunches for children in school acts as a foundation for good learning, more cohesive and harmonious classrooms, supporting teachers to teach and children to learn and achieve.

A healthy school food sector also supports local employment as well as wider food and farming supply chain development. Currently, despite a vision of an education system free at the point of access to any child regardless of background, children are means-tested for school lunches, undermining the programme's potential to drive future health and prosperity.

- Independent analysis shows that universal school meals during all six years of primary schools have been associated with reducing obesity prevalence.²⁷
- Independently commissioned evaluation of the first year of the Mayor of London's additional funding for free school meals in all London state-funded primary schools has highlighted multiple benefits showing that investment is 'more than a meal'. Uptake of healthy school meals has increased, more children are trying new foods, the policy is reducing administrative burdens for schools, improving relationships between schools and parents, and reducing anxiety and pressures on parents, enabling a better start to every school day.²⁸
- A study by Price Waterhouse Coopers for Impact on Urban Health calculates that, if free school meals were extended to all children in households under Universal Credit, each pound of investment would result in £1.38 economic benefits.²⁹
- If school meals were made available to all pupils universally, the returns would be even greater: £1.71 for every pound invested. Over a 20-year period, the researchers estimate that this latter approach could deliver economic benefits worth £99.5 billion over the next 20 years, if adopted.

- It is estimated that for every 100,000 children receiving school meals, on average school feeding programmes create 1,668 jobs.¹⁶
- If contracted under Real Living Wage, this could support the Government's vision of unlocking jobs and opportunities across the country.
- If contracted in line with Government Buying Standards and commitments to source from British producers, local companies and sustainable sources, this could also boost the UK's farming, SME sector and contribute to overall economic growth.

Addressing eligibility for School Meals

Despite dramatic increases in the cost of living, the threshold for eligibility for benefit-related school meals (total net income of £7400 after tax, before benefits in England) has not been increased since its introduction in 2018, six years ago.

- An estimated 900,000 children in England whose household income classed them as 'living in poverty' do not meet the criteria.³⁰ The Institute for Fiscal Studies has also warned about the cliff-edge effect that the threshold creates, which creates a disincentive to some working families to increase working hours.³¹
- Children in England are falling behind in accessing free school meals compared to the devolved nations. Wales has completed roll out of school meals to all primary pupils. Scotland is providing free meals to all P1-5 pupils, and expanding access in P6-7 to children in receipt of Scottish Child Payment. From August 2025, Scotland will also pilot similar targeted expansion in 8 local authorities for secondary pupils in S1-3.
- Whilst the Mayor of London is currently providing additional funding for primary schoolchildren's meals across London for the next four years³², councils across the rest of England are unable to meet the investment cost needed.

The Government must now step in to end the postcode lottery of access to free school meals, and seek to progressively end the means testing of children for a healthy school lunch. We welcome the universal approach taken for the current breakfast club programme in primary schools.

Whilst funding may not allow an immediate commitment to universal meals, we do believe Government should set out a roadmap to achieve this. Working with the Child Poverty Unit and DFE, HM Treasury should make provision in the spending round to immediately expand access to children in families in receipt of Universal Credit as a first step. The estimated cost of this (under current funding rates is approximately £500m per annum).

Ensuring a thriving, healthy and sustainable school catering sector

The funding levels for school meals have also not kept pace with inflation in recent years. With rising food, energy and wage costs, and other pressures on school and education budgets, there are increasing risks to the sustainability of school meals services for local authorities, catering companies and schools alike. When schools are forced to raise the price of paid-for meals or reduce quality and portion sizes, this

often results in lower uptake, further threatening viability of services, and exacerbating nutritional challenges for children and families. The Government must ensure a sustainable funding level that enables schools and their catering partners to operate this crucial part of the school day effectively.

- If the per meal rate had risen in line with inflation, then it would be £3.11 per day in 2024, not £2.53 per meal grant for free school meals at present.³³ The Mayor of London is now providing funding for 2024/25 at a rate of £3 per meal.
- A 2024 study conducted by Bremner & Co for Sustain member School Food Matters analysed the true costs of providing nutritious, sustainably sourced school meals, and recommended a rate of £3.17 per meal, not dissimilar to the inflation rate above.

Monitoring Compliance with School Food Standards

The UK Government invests over £1.4 billion of public funds to the delivery of free school meals in England, with mandatory School Food Standards applying to all state-funded maintained schools and to most academies for food served across the whole school day. However there is no formal monitoring of compliance with standards, and a large degree of concern that they are not being delivered adequately.

The FSA compliance pilot, which reported in August 2024 concluded that there is a viable way of conducting these checks, however there is a shortage of available resources for training and supporting officers to undertake them, or to work with schools to remedy non-compliance³⁴. A barrier to implementing an effective monitoring system is therefore lack of resource available to the Department for Education to work with FSA, Ofsted, local authorities and school networks.

- The budget for DFE should be sufficient to allow establishment of a system of school food standards monitoring and compliance across the whole of England, and in devolved nations via the Barnett Formula.

Ensuring access to breakfast provision in areas of high deprivation

We welcome the Government's commitment to healthy breakfast club provision, and the announcement of a tripling of funding during 2025/26 to cover the early adoption of the new primary breakfast clubs and continuation of the National School Breakfast Programme working in both primary and secondary schools in areas of higher deprivation.

- The spending review should support a multi-year settlement in respect of ensuring during the transition in primary there is still access to this important scheme targeting students more likely to come from disadvantaged or low-income backgrounds, and that there should be long-term support for this programme in secondary schools.

Support healthy Holiday Activities and Food Programme

The Department for Education has recently confirmed the continued funding of the Holiday Activities and Food Programme (HAF) for 2025/26.

There is significant evidence of the impact of this programme, which focusses free places on children eligible for pupil premium/FSM. Evidence shows that children participating in these programmes are more likely to return to school healthier and more ready to learn.

Programme providers – schools, local authorities and their delivery partners – must be able to plan this service effectively, with knowledge of funding available. We urge the Treasury to work with the Department for Education to ensure a multi-year settlement for a national HAF programme that supports this planning, ensures adequate monitoring and evaluation, and incentivises innovation in delivery, such as that demonstrated by the HAF+ pilots in the North East of England.

Funding these investments

We note that funding for the National School Breakfast Programme was provided from the revenues raised by the Soft Drinks Industry Levy. To fund the above, see the section on expanding use of financial incentives for a healthier food and drink industry plus the detailed submission from our Recipe for Change campaign. There is significant public support for use of levies on unhealthy food to be used to expand nutritional safety nets such as school lunches, Healthy Start, breakfast programmes and the Holiday Activities and Food Programme.

Environment and Rural Affairs

Protect and increase the farming budget for the long term (Department for Environment Food and Rural Affairs [DEFRA])

Recommendations:

- **Increase the farming budget as a mission-critical resource for the environment that must be allocated toward long-term environmental targets to ensure the UK meets its EIP 2023 objectives and ensure long-term food security.** The UK farming budget has remained unchanged since 2013, and significant inflation since then means today's budget is a real terms funding cut.
- **Invest in independent advice and training by increasing the Future Farming Resilience Fund by 10% (£3.2 million), with the extra money allocated to train farmers transitioning to agroecological farming practices,** ensuring that whole-farm planning incorporates both economic resilience and environmental gains.

The case for investment

The Government's Environmental Land Management (ELM) schemes represent one of the most progressive farming policies in Europe. With 70% of UK land farmed, the ELM schemes aim to use this vast resource to deliver public goods that restore nature, mitigate climate change, and support resilient food production.

According to the Environmental Improvement Plan (EIP) 2023, achieving environmental targets is highly dependent on effective land management. The Office for Environmental Protection found that the UK is currently off track to meet those targets, with the effects of climate change and nature degradation already starting to impact our economy.³⁵ Climate change impacts – such as increased flood risk³⁶ – are already posing a significant threat to agricultural productivity.

On top of this, the Green Finance Institute recently estimated that nature degradation could cause up to a 12% loss in UK GDP, highlighting the economic risks if environmental targets are not met.³⁷ This is further backed up by analysis from PwC, which showed that 47% of companies listed on the London Stock Exchange are highly or moderately dependent on nature.³⁸

The ELM schemes are delivering positive early results. Evidence from Natural England shows that species increased by 53% in areas under agri-environmental schemes, indicating the positive biodiversity impact of such policies.³⁹ However, the current funding level remains insufficient, with a recent independent study estimate that at least £5.9 billion is required to fully fund ELMs to deliver on nature and climate goals.⁴⁰

In addition, the National Audit Office found that available advice and support for farmers remains inadequate, which limits their ability to transition to nature-friendly practices.⁴¹

To ensure long term food security while making progress towards the Government's climate and nature targets, a sector-wide transition towards nature friendly and agroecological farming will be necessary – shifting away from the dependence on chemical inputs, and towards practices which work in harmony with nature, such as organic.

The efficiency of that transition will largely depend on the provision of independent advice – which is not tied to input sales – and the effectiveness of that advice. A growing body of research has highlighted the limitations of traditional advisory services, as the standardised solutions they offer are often unsuited to the specific context, conditions, and needs of each farm.⁴² The issue of trust can also be a barrier to the implementation of farming advice.

Ensure Fairness in the Food Supply Chain

(Department for Environment Food and Rural Affairs [DEFRA])

Recommendations:

- **Expand, strengthen, and reform the Groceries Code Adjudicator to ensure supply chain fairness.** Significant gaps in the food supply chain remain overlooked by current regulations.⁴³ The GCA's remit should be expanded and strengthened to include businesses with a turnover of over £500,000, with the GCA's golden rules legally incorporated into the GCA, and it should also adopt a more deterrence-based rather than compliance ('collaborative') orientated approach to enforcement, to reduce incentives for non-compliance. This could involve a greater use of its already existing fining and investigatory powers.
- **Build up more farmer focused routes to market by establishing a £5 million Food Hub Fund to support the establishment of 15 new food hubs across England, helping more growers access farmer-focussed routes to market.** Farmer-focused routes to markets are inherently fairer for farmers and bring more prosperity to the local economy. Analysis shows that **for every £1 spent on veg box schemes and in farmers' markets, £3.70 is generated in wider community and industry value.**⁴⁴

The case for change and investment

The UK's food supply chain has become highly concentrated, with over 95% of food sold through just 12 retailers. This concentration has led to a significant imbalance in power, with farmers often earning less than 1p per pound of produce sold.⁴⁵ Recent research shows that 49% of growers fear going out of business within the next year, citing unfair contracts and supermarket pressures as key factors.⁴⁶ This environment not only affects farmer livelihoods but also hinders the sector's ability to invest in sustainable, nature-friendly farming methods and deliver on the EIP targets.

Develop and fund a Horticulture strategy

(Department for Environment Food and Rural Affairs [DEFRA])

Recommendations:

- **Develop a comprehensive, cross-departmental horticulture strategy to secure a resilient future for British horticulture while addressing the interconnected challenges of public health and environmental sustainability.** As recommended by the House of Lords Horticulture Sector Committee,⁴⁷ the Government should recommit to developing an ambitious, cross-departmental horticulture strategy.

- **Launch a public campaign to boost the consumption of fruit and vegetables:** As it stands, 10 times more money is estimated to be spent on advertising foods high in fat, salt and sugar (HFSS) than on fruit and vegetables.⁴⁸ Some local authorities⁴⁹ are already taking steps to restrict the advertising of unhealthy foods – if this money was redirected towards the marketing of healthier options, it could **drive a vital increase in fruit and vegetable consumption, ensuring a reliable market for UK growers as a result.**
- **Harness the power of public procurement to transform the national food landscape.** The UK public sector spends approximately £2.4 billion annually on food procurement and catering services.⁵⁰ This expenditure covers various institutions, including schools, hospitals, prisons, and government offices. As such, **public procurement has the potential to boost demand for local, nature-friendly, sustainable produce, promoting biodiversity, contributing to climate targets and supporting healthy diets. The Government Buying Standards should also be updated to drive healthy, planet-friendly diets,** requiring that caterer's source more UK-grown, seasonal, agroecological produce, including organic, supporting local supply chains wherever possible.

The case for change and investment

DEFRA's latest horticultural statistics reveal that the UK produces just 52.7% of its vegetables and 15.8% of its fruit, a figure that continues to decline. With 33% of adults failing to meet the recommended five-a-day intake, and with diet related illnesses such as type 2 diabetes projected to cost the NHS more than cancer by 2035⁵¹, and the number of people economically inactive because of long-term sickness at 2.8 million⁵² – increasing fruit and vegetable production and consumption is a clear, cost-effective strategy to ease the growing financial burden on our healthcare system and improve our public health.

With a revitalised horticulture sector, there's the potential for a £500 million⁵³ increase in direct GDP contributions from the fresh produce industry, and up to £126 billion⁵⁴ of long-term economic benefits from a healthier, more sustainable UK food system of which increase fruit, vegetables, and fibre consumption is a core component.

Resource regulators so that river pollution from agriculture can be tackled (Department for Environment Food and Rural Affairs [DEFRA])

Recommendations:

- **Restore funding of environmental regulatory and delivery bodies, including include the Environment Agency and Natural England, to at least 2010 levels** (in real terms) so that they have the resources and skills to enforce standards for river testing and regulation enforcement.

- In addition to supporting sustainable agriculture through farm payment schemes, **create equitable and just incentive schemes for operators of intensive livestock units to transition to more sustainable, less polluting and more climate-friendly farming systems.**

The case for change and investment

The Government has a target of achieving Good Ecological Status for 75% of water bodies by 2027. Currently just 15% of English, 44% Welsh, 67% of Scottish and 31% of Northern Irish river stretches meet this standard. Agriculture is the main cause of river pollution incidents in England and livestock farming is the source of 70% nitrogen pollution in the UK. It is not possible to deliver government targets for nature and water recovery without significantly reducing pollution from agricultural sources. Tightened regulations promised by the Government will fail without properly resourced regulatory agencies.

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Sustain is a powerful alliance of organisations and communities working together for a better system of food, farming and fishing, and cultivating the movement for change.
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