

FSA review of UK work on food and low income issues

Response by the Food Poverty Project of Sustain: the alliance for better food and farming

May 2004

Sustain welcomes the Food Standards Agency's decision to investigate the work currently being done throughout the UK at local level to help people living on low incomes to feed themselves and their families. Many people are caught in a vicious circle in which low income leads to poor diet, which in turn leads to long-term poor health, which leads (via impaired educational attainment) to restricted employment opportunities, which lead back to low income. Local food initiatives are set up – sometimes in desperation - to break this circle. We feel that this Review examines very sensitively the context in which food projects arise and the way they work. We hope that the questions it raises, and the policy response they give rise to, will lead to coherent measures not just to help food projects to work better, but to help reduce the need for them to be set up in the first place.

About Sustain and the Food Poverty Project

Sustain has been campaigning to improve the diet of people on low income since the 1980s. Since 1996 it has run the Food Poverty Project, which is the only UK-wide organisation campaigning on the interrelated issues of poverty, limited access to nourishing food, compromised diet and poor health. It is described in this report as an example of good practice among organisations taking a “joined up” approach to these issues. It helped with this Review both through the knowledge of its staff and by making its contact lists available so that the initial research and the current consultation could reach as many people as possible. This response is itself based on consultations both with the working party that advises on the development of the Food Poverty Project's work, and with members of our network that we could contact before the FSA's deadline.

Clearly, therefore, our response to this Review is not disinterested. We feel that the Review's analysis and recommendations broadly endorse our approach. In particular, we hope that the Review's recommendation that England, Wales and Northern Ireland would benefit from organisations comparable to the highly successful Scottish Community Diet Project will lead the Food Standards Agency to fund our work in future.

Q1 Are there any examples of current work not covered that could help inform the way the Agency develops its work to address the needs of low income consumers?

1.1 The Review provides a very helpful overview of the types of work currently being undertaken at local level. It recognises the fact that because many food projects are temporary or *ad hoc*, many more probably exist than are currently recorded or networked. We realise that the remit of this Review was to look at work being done at local level. However, some work being done at local level (such as Sure Start, Five a Day and the new Healthy Start programme) is part of a national initiative to improve diet in vulnerable groups, with the overarching goals of reducing levels of chronic disease and reducing social inequalities in health. We feel that the term "areas of work not covered" should include various strategic initiatives which the Agency could influence and which in the long term may have a more substantial impact on the nutrition of the poor than the typical community food project described in this Review. To conform with the rubric of your questionnaire, we have listed these suggestions at **Question 8**.

1.2 One large category of local food initiatives under-represented in this Review (and also on our database) is **lunch clubs for the elderly**. These clubs may not consider themselves to be involved in food poverty work, but they nevertheless provide many meals for people who might otherwise be in danger of malnourishment. There is clearly scope to make contact with these groups and their networks, to pool experience and share facilities. **Meals on Wheels** are another important source of food for elderly or disabled people (many of whom live in or near poverty, and whose mobility

problems mean they have been badly affected by the widespread closure of local food shops). Until recently a volunteer-run service which provided freshly cooked, hot meals, Meals on Wheels are now usually supplied on contract by commercial caterers, who almost invariably supply frozen meals. This is an important area of work, which we feel needs to be firmly on the radar of reviews like this one (and networks like ours).

1.3 Special needs groups Many of the groups on our database were set up to help people with special needs (such as physical disabilities or mental health problems), or people in need of rehabilitation, to feed themselves. Given the extent to which poor nutrition exacerbates many other conditions (including mental illness) it seems worth pointing out that any efforts to coordinate or underpin local efforts to tackle food poverty need to take account of the special requirements of these groups.

Q2. What should be the main priorities of the Agency in its low income work?

We would list the recommendations put forward in the Review in the following order of priority:

2.1. Ensure that any Food and Health Action Plan for England¹ that results from the consultation document *Choosing Health* includes a strategy to tackle food poverty (not simply poor diet, or diet-related ill-health) by addressing the structural as well as the personal causes of the problem (please see our comments at Question 8). A Food and Health Action Plan should call upon all relevant agencies to recognise their potential influence on food supply and diet, and to make specific policy changes by specific deadlines. Our suggested policy options for such a strategy are too numerous to itemise here, but are contained in *Policy Options for the New Millennium*, published by Sustain in 2000. Since Scotland and Wales already have food strategies (and Northern Ireland has one that has not yet been implemented) it is important that the English plan draws on and complements these documents. The aim should be for all four UK nations to have food strategies which, though not identical, nevertheless share the same goals and advocate similar strategies to achieve them, with equal support from

UK or national governments. The strategy will need to be clear in its objectives and flexible about allowing local communities to achieve the goals in appropriate ways. It also needs to be credible, persuasive and properly funded, to overcome widespread scepticism, reflected in the Review, that a lot of local food work currently being initiated is a “box-ticking”, exercise without any real commitment or follow-through.

2.2 Having developed a national strategy to tackle the economic and social causes of poor diet, help should be given to local agencies who wish to use it as a model for local action plans to put it into operation. Participatory methods are an important means of hearing local analyses, developing achievable plans and enlisting local support for change². We know that several regions already have active networks of food projects working to meet common goals: these places have *de facto* food strategies. Although Primary Care Trusts (PCTs), or their directors of public health, now have a duty to analyse local barriers to healthy eating, our research has shown that many PCTs are uncertain what to do about this requirement, and are anxious for guidance. Although this responsibility has been given to PCTs, we agree with the implication of this report that the Local Strategic Plans, with their overarching remit and multi-agency composition, are ideal points for coordinated “upstream” intervention to monitor and improve food access, although this may be unfamiliar territory for some of them. We would stress the point made in the Review that it is important not to confine policies tackling poor nutrition to health agencies, because of the wider causes of the problem.

2.3 Ensure that all four nations in the UK have national organisations to support and coordinate local food work, along the lines of the successful Scottish Community Diet Project, to help ensure that work undertaken at local level informs and is supported by regional and national policies. We feel that since we currently do some of what the SCDP already does, with only a fraction of its funding³, we are best placed to fulfil this

¹ Choosing Health? Choosing a Better Diet. A consultation on priorities for a food and health action plan. Spring 2004. Department of Health

² *Hunger from the Inside: The experience of food poverty in UK*. Sustain, 2002. *Reaching the Parts... Community mapping: Working together to tackle social exclusion and food poverty*. Sustain, 200

³ The Scottish Community Diet Project (SCDP) is funded by the Scottish Executive. Our colleagues there have calculated that, if the Food Poverty Project received the same level of funding for work in England (from whatever source) as the SCDP does, per head of population, for their work in Scotland, the Food Poverty Project would have a budget of some £4 million and employ around 40 staff!

role in England, perhaps with funding from the Agency. We also feel that the four national networks should have a commitment to meet each other regularly – perhaps by means of a national standing conference on food and low income – to maintain a UK-wide dimension to the networks, share experience, avoid duplication and campaign together.

2.4 Recognise that local food work, whether undertaken by statutory or community groups, is likely to prove counterproductive (if it is short-lived, disillusioning and exhausting) if it is not given access to long-term funding (see 4.1 below).

2.5. Use the development and implementation of a national food and low income strategy, as outlined above, to demonstrate the importance of working in genuinely participatory ways to ensure that local food poverty work meets the needs of communities. These needs will be different: the obstacles to eating healthily may be to do with transport, local shops or language difficulties. Local consultation – using participatory techniques– can help to ensure that locally appropriate policies are developed. This has been the experience of the areas where Sustain supported Community Mapping processes (see above).

2.6 We are interested in the suggestion that the Agency could look at structural alternatives such as subsidising fruit and vegetables for low-income consumers or promoting healthier foods through mass media advertising campaigns. If these ideas are pursued, we would like to be involved in their development.

Q3. What if anything needs to be done to improve linkages between national, regional and local statutory and voluntary organisations.

3.1 It is clear from the Review that many statutory workers already feel under pressure to work in partnership with different organisations, and that these partnerships, though often productive, can also generate extra work, especially paperwork, and can in some cases dilute effectiveness. It seems to us that what is needed are not more requirements for linkage, but coherent guidance about what the objectives of national policy are,

and effective support for local agencies or groups putting plans into action to try and achieve the objectives, as we describe at 2.1 and 2.2 above. The four proposed national organisations (including the Food Poverty Project) could act as clearing houses for information, and help coordinate and support the work being done at local level.

Q4. What mechanisms could be established to ensure that low-income food initiatives have access to longer term funding?

4.1 If we knew an easy answer to this question, we would be campaigning vigorously for it, because the problems caused by short-term funding are the issues most often raised with us by network members. We recognise the dilemma for funders, whether they are distributing public or private money. The fear is that by providing long-term finance for something that can be seen as an emergency measure (which many food projects are), the measure, and the underlying need that gave rise to it, may be prolonged rather than eliminated. The hope of many food poverty projects is that eventually they will not be needed. Until then, however, the reality is that they meet an urgent local need and also play an important part in the (uncoordinated) national public health campaign to improve the diet of the poor. In this context, they rightly claim that they would be able to operate more effectively if they were not continuously on a precarious financial footing. Now that many are being set up temporarily with PCT or Health Action Zone funding, it is hard to argue that longer-term statutory funding should not also be available. But how long is long term? It will take decades to change eating habits along the lines and to the extent now being advocated on the grounds of health and sustainability. Funding a food project for five years may not show measurable changes in “hard” indicators (see question 7) within the funding period, but it would certainly lift the burden of insecurity felt by those involved in short-term funded projects.

4.2 We also feel that the distribution of funding could be a means of coordinating work and encouraging a more strategic approach to the problem. In some areas, funding to relieve food poverty might best be spent on subsidising public transport to improve access to shops, or providing business support to reopen a local commercial

greengrocers, rather than setting up cook-and-taste sessions or a volunteer-run co-op. These decisions have to be part of long-term local strategic plans, and cross-sectoral decision-making powers. A dedicated “pot” of money set aside annually at council or LSP level to address food access problems should allow decisions to be taken more strategically, and would be preferable to the current situation, where food projects compete with other initiatives for PCT or regeneration funding, resulting in a patchwork of one-off, not necessarily well planned and often short-lived initiatives.

Q5. What needs to be done to promote the importance of working in participatory ways?

5.1 Participatory methods have proved highly effective at reaching inaccessible sections of the community and involving communities in the development of policies that directly affect them. The approach should be built into the development and implementation of food strategies (see 2.5 above). However, it will be important to provide help (by providing funds for training, support and support materials), to avoid wasting money on a patchwork of desultory mapping or consultation exercises which do not lead to change, and are therefore resented as being merely token gestures by the participants.

Q6 Are there things the Agency should be doing to help develop regional networks?

6.1 The clear recommendation of the Review is that food and low income work can be effectively coordinated and taken forward by national networks which maintain contact with community food projects, and provide a conduit to and from those groups for information and relevant policy developments. In the UK, the most effective such network currently exists in Scotland. At the Food Poverty Project, we have never enjoyed the same consistency or level of funding, and consequently have not been able to undertake a lot of work that we would have liked to do. We would hope that one outcome of this review will be that all four UK countries are helped to establish national networks focussing on food and low income work, and we feel that we are

best placed to fulfil this role in England. We are aware of several informal regional or local networks in England, and we appreciate that some networking functions are most effectively done in a smaller geographic area. These may be best supported by local and/or regional sources of funding but, in our experience, it is useful for groups to be linked not only at local and/or regional level, but also be connected to larger, national networks. It is also worth stating that we see little value in trying to list or “map” these local and regional networks at UK level. Their importance lies in their responsiveness to and suitability for local needs and they change, grow (and sometimes shrink) accordingly, sometimes gradually but sometimes quite rapidly. For this reason, Sustain’s own database has never claimed to be comprehensive and never attempted to become so.

Q7. What criteria would be needed to measure the effectiveness of any increase in spending?

7.1 One of the first pieces of research the Food Poverty Project commissioned, in 1996, was a review of the literature on food projects and evaluation. How to measure success and cost-effectiveness? The resulting report⁴ demonstrated that there was already an army of academics at work, measuring how successful various interventions were and assessing the value of the criteria used to measure them. The report identified the key questions as “what works?”, “what makes it work?” and “how do you know?”; to which might be added, “how could it work better?”, and “how long does it take to work?” Knowing what you would like to know, however, does not make it simple to find out, and the report concluded that food and nutrition projects are difficult to evaluate. Hard indicators of success, such as reductions in disease levels or improvements in nutrient intakes, may be unobtainable, either because the timescales involved are too short or the methods necessary for data collection (such as weighed food diaries or blood tests) are too demanding or intrusive.

Research can determine whether people’s shopping routes have changed as result of an intervention, or whether their purchase of particular types of food, such as fruit and

vegetables, has increased, or whether their cooking habits have changed. More subjectively, participatory appraisal feedback can show whether people feel their food shopping has become less difficult, whether they find it easier to obtain healthier foods, and whether they feel their quality of life has improved. The report made the point that “to increase parents’ confidence in feeding their children” or “to increase people’s sense of control of their food environment” are legitimate objectives for a food project, as long as they are clearly stated and their implementation is well thought out.

The question of evaluation continues to preoccupy academics who study food projects but also politicians concerned with “value for money”. A recently conducted and still unpublished scoping exercise by the Health Development Agency on evaluation methods for community food projects has found many evaluative tools that could be adapted for use in community settings, but also points out that projects that are struggling to keep going do not have time or money to evaluate (even though, paradoxically, evaluation might prove their worth and influence funding). In any case, their diversity and the relatively small number of clients using them will always make statistically robust, large-scale comparisons difficult. Given the fact that there is already so much necessarily inconclusive academic work on the subject, it is probably necessary in this case for funding and policy to forgo the need for rigorous “gold standard” evidence before proceeding. In any case, incomparably larger sums of money are spend by Government, for example on the Common Agricultural Policy, despite evidence showing not only that it does not produce benefits, but in fact causes considerable environmental and social harm. It seems perverse to require higher standards of proof of effectiveness for community food projects.

Q8 Further points

8.1 The Review confirms the Food Poverty Project’s experience that local food projects generally tackle the problems of poor diet and poor food access either by *supplying food* to relieve a local problem, for example by means of community cafes or food co-ops (as is the case with many of the community-led projects) or by *trying to persuade*

⁴ Project Development and Evaluation: Background and review of the literature. Report to the National Food

people to change their behaviour by providing information or skills training (which is what many of the initiatives now being set up by local health authorities are doing through, for example, cooking clubs). They do not attempt to address the wider causes of food poverty, which are often beyond the control of individuals or local groups. There is now widespread acknowledgment, however, that structural changes to the way food is manufactured, distributed and marketed will be necessary if people are to make the fundamental and sustained changes to eating habits now thought to be necessary.

The report eloquently expresses the anxiety felt on the ground that some of the work currently being undertaken is a “tick box” exercise that may simply “tickle round the edges of the problem”. We wholeheartedly welcome the Agency’s decision to investigate and support local food work. However, we feel it is also vital that it uses its position as an authoritative and independent guardian of the consumer interest in relation to food to focus equally on the policy and structural changes that will be needed if the long-term dietary changes now being advocated are to be achieved.

8.2 The Background paper supplied with the report points out that “the Agency recognises that many of the problems faced by people on low incomes are outside the remit of the Agency and that many other government departments are working in this area”. While recognising the realism of this statement, we feel that the Agency can not call upon local organisations and agencies to work together to tackle this problem in the concerted way necessary if it designates certain, crucial areas of activity as being outside its own remit. The report records the frustration felt at local level that although the importance of diet as a determinant of health has now been widely recognised in public health policy documents, this recognition has not been translated into appropriate policies to tackle the problems, and is not always supported by policy coming from other government departments (Section 6 of the Review). Community-level work cannot solve the problem of poor diet without a national policy framework covering a range of issues, from planning and agriculture to product composition, that supports dietary change. Local work is by definition local: the Agency, on the other

Alliance By Elizabeth Dowler, 1996.

hand, is in a position to influence decision-making at national, UK and European level. We would argue that part of the FSA's work in this area should be to use its authority to highlight the interdependent causes of the problem and the consequent need for coherent action at every level.

8.3 Sustain's report *Policy Options for the New Millennium* (2000) itemises the policy changes we feel are necessary to support beneficial long-term changes to diet and food supply. The following points highlight some key areas where policy changes could improve the diet of poor families and their children on a large scale, and where the FSA could intervene effectively in two ways, by collating the evidence (which already exists) and by making a compelling case for the necessary changes:

8.3.1 School meals. For many poor children, these remain the main meal of the day, even though uptake of free meals is relatively low. Ensuring that schools had the money, skilled staff and institutional support necessary to provide a high-quality meal every day would boost nutrition and help change eating habits and food awareness. This should be underpinned by the reinstatement of food education and cooking skills to the national curriculum. Allocation of statutory funding for breakfast clubs, which have been shown to benefit children's performance in school, could also play an important part in achieving nutrition in low income groups. We welcome the work the Agency has already done in this area, but would urge it to pursue the policy recommendations that flow logically from it.

8.3.2 Healthy Start (formerly welfare foods) and benefit levels. The current reforms, which replace milk tokens with vouchers for a variety of foods including fruit and vegetables, are welcome, but the total amount provided (under £3) – is insufficient to have a significant beneficial impact on the diets of very poor pregnant women and their young children – a group most acutely in need of better nutrition. Similarly, benefit levels are calculated without reference to the real cost of feeding a family a nutritious diet. It is pointless to urge the poorest people -- who currently have the worst levels of diet-related ill-health, including obesity -- to change their eating habits if they

can not afford to do so. The Agency has a responsibility to draw this to the attention of the government departments that set benefit levels.

8.3.3 Food promotion We urge the FSA to act upon the findings of its authoritative review, which found that promotion influences children’s choice of foods both between and within categories, and support legal protection for children from junk food marketing⁵. Sustain will, of course, be responding separately to the Agency’s consultation on this issue. In the meantime, we urge the Agency not to baulk at making the case for far-reaching changes to support better diet and food access, even when this may conflict with the interests of other government departments.

8.3.4 Diverse food retail provision At the moment, it is not the responsibility of any government department or agency to ensure that communities have access to good food shops. Poor people, who are least likely to be car owners and may be elderly or have mobility difficulties, have been worst affected by the shift to car-borne hypermarket shopping. The Agency is in a position to make the case that, as areas are developed or regenerated, a diversity of neighbourhood food retail provision must be planned into the proposals.

8.3.5 Food manufacture and sale We urge the Agency to continue its efforts to persuade food manufacturers to use compositional standards to reduce levels of fat, sugar and salt in processed and catered foods. We also urge it to pursue a parallel policy with retailers to persuade them to use pricing, promotion and display to provide incentives to shoppers to make healthy choices – for example by making wholemeal bread cheaper than white bread or by displaying fruit at checkouts instead of sweets.

What next?

We would be very keen to explore with the FSA, alongside others, what the next steps might be in the development of the FSA’s work on food and low income issues.

Traditionally, the government process has been as follows: responses to the consultation exercise are considered by officials; policy proposals are drafted

⁵ See the Children’s Food Bill at www.sustainweb.org/childrensfoodbill

(incorporating some responses but not others, usually without explanation); these proposals are agreed or amended by decision makers (in this case, the FSA Board); government policy is announced (and sometimes implemented, occasionally in co-operation with those who were originally consulted). In other words, it is often only at the final stage where organisations are asked to re-engage in the policy process. At this point, many refuse, since they do not agree with the policy that has emerged.

This approach is rarely helpful but may be particularly inappropriate in this policy area, and we appreciate that the FSA is open to working in more inclusive ways with low income groups and those who support them. Thus, we would like to suggest that the FSA consider the following options (which are neither exhaustive nor mutually exclusive):

- ❖ Host a meeting to discuss the responses to the consultation exercise with those who responded, and explore common themes and any areas of disagreement;
- ❖ Hold further discussions, particularly with groups and individuals who could not respond in time, or who chose not to respond. (We understand some meetings took place around the country but the time available to organise these was very short);
- ❖ Involve decision makers in discussions about policy proposals, with people outside the FSA as well as officials, before they are asked to take final decisions about FSA policy.

Sustain's Food Poverty Project looks forward to working with the FSA in the development of its programme of work in this important field.

Food Poverty Project

Sustain: the alliance for better food and farming

Contact: Jeanette Longfield – jeanette@sustainweb.org and Courtney Van de Weyer – courtney@sustainweb.org