

RESPONSE BY SUSTAIN: THE ALLIANCE FOR BETTER FOOD AND FARMING TO THE FSA NUTRITION STRATEGY FOR WALES

The status of this response

Sustain: The alliance for better food and farming advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the living and working environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level.

Sustain is delighted to have the opportunity to comment on the FSA's Nutrition Strategy for Wales. Unfortunately, due to the fairly short deadline for responses, it has not been possible for Sustain's membership as a whole to examine this response. (Given the size of the membership this is a quite lengthy process.) Thus this response does not have the status of a formal Sustain paper, with the usual accompanying endorsements from relevant member organisations. We are aware, in any case, that some organisations in Sustain's membership (e.g. the National Heart Forum) have contributed substantial responses, and there seems little value in duplicating this excellent work.

Instead, we have drawn on the experience of the Sustain projects, in which sections of the membership work collaboratively. This has allowed us to focus not on the questions posed in the consultation document (which have been better addressed by others) but on how Sustain and its membership might assist in the implementation of the action points listed in the Nutrition Strategy. If you thought it appropriate, we would welcome the opportunity to discuss any or all of these elements with you in more depth in future.

Additional Documents

Aware of the FSA's tight timetable, heavy workload and anticipated high volume of submissions, this paper aims only to summarise important points. Additional documents, elaborating on the arguments and proposals made in this paper are attached as annexes.

The remainder of this paper is structured around the action points, and grouped according to particular themes.

Food Poverty

2. *Ensure that a database of Welsh projects promoting a balanced diet, together with an effectiveness review of interventions to promote a balanced diet, are made available to key players.*

Sustain's Food Poverty Project is pleased to have been able to undertake research for the FSA Wales in 2001 which resulted in identifying 70 projects in Wales that were working to improve access to healthy diets. This database of projects is part of a UK-wide Food and Low Income database developed by Sustain, in collaboration with the Health Development Agency (HDA), which holds information on a wide range of community food projects throughout the UK.

The Food Poverty Project has been promoting the database through published articles, the Food Poverty Network membership and in its promotional literature since 1996. The Food Poverty Project has recently contacted all projects on the database, including the 70 Welsh projects, in an annual update of all the information held on the database. This information will be freely available, in redesigned form, via the food and low income website from early September.

There are a number of ways in which this database could be further developed. It is likely, for example, that more projects have been set up in the intervening 18 months since the original research to identify food projects in Wales was carried out by Sustain. We would welcome the opportunity to discuss with FSA Wales how best to build on the valuable sources of information and expertise in the database.

3. *Disseminate information to key players on the impact of community initiatives on access to a healthy balanced diet. This will include the role of food co-operatives, farmers markets, food box schemes, community delivery systems, community cafes, healthy tuck shops and breakfast clubs.*

Sustain's Food Poverty Project has a long history of information dissemination and exchange to a wide range of stakeholders on food poverty issues. Through the Food Poverty Network the actual and potential benefits of community food initiatives have been well documented. As part of its remit to promote community food projects as one element of combating food poverty in the UK the project published *Making Links – A toolkit for local food projects*, in 2000. This toolkit provides people with a combination of inspiration and information to develop successful food projects that are rooted in the community.

The report *Food Poverty: policy options for the new millennium* (published in 2001) also demonstrates the importance of community food initiatives as part of a broad range of other policy initiatives to tackle food poverty. The Food Poverty Project has an extensive understanding of the benefits and difficulties faced by community food initiatives and continually works to emphasize the need for long term support within a wider strategy to tackle food poverty and health inequalities.

In addition, the Network regularly publishes a newsletter, *Let us eat cake!*, in which new community food projects on the Food and Low income database are featured. The newsletter also regularly features new and existing funding sources for community-based food projects.

9. *Develop a model of good practice in one locality in Wales in partnership with the Local Health Alliance, to address issues of public access to fruit and vegetables.*

Sustain's innovative Community Mapping project has been developed over the last three years precisely to address the issues around public access to a health diet, including fruit and vegetables. So far, we have worked in seven localities in England using Participatory Appraisal techniques to help local communities to examine and assess their local food economies and to develop effective policy and action to tackle food poverty. The starting point is that people are experts in their own lives, so any resulting policies will be more relevant than those imposed from outside the community.

The Participatory Appraisal (PA) techniques are based on those used by overseas aid agencies who are committed to seeking out those generally excluded from the evaluation and decision

making process and they are increasingly being used in the UK. PA enables the whole community to express their views, set priorities among the issues they think are important and identify solutions to problems they are facing.

PA methods involve using a variety of visual techniques, such as maps, Venn diagrams, matrices, pie charts and drawings. These techniques are designed to include everyone and overcome barriers of language, literacy and confidence. These methods, therefore, are effective, thorough and inclusive. Local residents, food workers, local authority and health authority officers and policy makers were all involved in the Community Mapping project. The communities that took part in the project have gone on to develop action plans built on their respective project findings.

In 2000, Sustain published its first report of Community Mapping in the first three pilot project areas, entitled *Reaching the Parts... Community Mapping: Working together to tackle social exclusion and food poverty*. This report continues to be in demand around the country. Another two reports from the Community Mapping project are due to be published at a seminar to be held on 20 September in London. Details are attached at annex I and we would be delighted if representatives from FSA Wales could attend.

In short, the Community Mapping project has been very successful at enabling local communities to look at and define food poverty and social exclusion problems as they experience them, and to develop appropriate solutions to tackle those problems. We would like to explore, with the FSA Wales, using Community Mapping as a model of good practice in the chosen locality in Wales.

45. *Establish community cooking classes, especially for parents of young children, using a mobile unit for classes in areas where facilities are limited.*

The Food Poverty Network's Food and Low Income database currently holds information on four Welsh projects which run community cooking classes. Through the Network, the database and a series of community seminars, the Food Poverty Project has gathered a wealth of information about the range and types of community cooking classes. It is also aware of the obvious benefits of learning how to cook and the wider benefits, such as building confidence and skills, creating social cohesion, and understanding the common difficulties in setting up and sustaining a viable a cooking project. Many of the Community Mapping areas have also developed cooking classes as a result of the process. In one area the development of cooking classes has led to some of the participants going on to literacy classes at the local adult education institute.

54. *Review free transport schemes to supermarkets to investigate the feasibility of their extension, especially in rural areas and investigate the feasibility of free delivery and local food vans, particularly to disadvantaged areas.*

The recent DEMOS report on food poverty - *Inconvenience Food – the struggle to eat well on a low income* - launched in association with Sustain, explored issues of access by low income consumers to good quality, affordable food. In particular, it sought to establish whether the phenomenon of food deserts is an exclusively urban one, and if food deserts also exist in rural areas. Detailed interviews with over 100 families living in urban and rural communities revealed that the problem of access to good quality affordable food can be even greater in rural areas.

The Food Poverty Project endorses the strategic action recommended by the FSA Wales, described above, as an extremely important area to investigate, and would be interested in undertaking an independent review of free transport schemes to supermarkets in partnership with FSA Wales. Clearly major food retailers would also need to be involved, since we believe that much of the responsibility for improving access rests on their shoulders. However, it is still important to establish independently whether any current free transport schemes to supermarkets are actually serving the community they are designed to serve, and to discover what, if any improvements can be made. We would also recommend that the FSA Wales works with local authorities and others to explore what more can be done to improve local public transport services in disadvantaged areas.

55. *Produce recipes designed to meet local needs taking account of the needs of lower income consumers where appropriate.*

Many of the community food projects on the Sustain/HDA Food and Low income database publish recipes for healthy eating on a low budget. The Food Poverty Network also has a collection of similar recipe booklets accumulated over the years. Our experience, based on community food projects, is that the information contained in the recipe booklets may be less important than the process of producing them. The best used recipes appear to be those that are developed and provided within a supportive environment – such as a community cooking class (see above) – and in close partnership with the people that will be using them.

Bearing this in mind, it may not be appropriate for major food retailers to undertake this work. However, FSA Wales could work with food retailers and community groups and, together, develop recipes designed to meet local needs. These local needs could include exploration of seasonal and culturally distinctive recipes, thereby making links with the agenda for local food supplies and environmental sustainability (see below).

Grab 5! Promoting fruit and vegetables

A synopsis of the Grab5! Project is attached at Annex II. The following is a brief summary of how the project might be able to help deliver some of the action outlined in the Nutrition Strategy.

8. *Pilot innovative approaches to increase fruit and vegetable intake in schools and analyse the effectiveness of pilot projects with a view to informing national policies.*
17. *Within the current school curriculum, encourage and facilitate the teaching of nutrition and cooking skills in schools, and ensure that the potential for improving the teaching of and food skills is considered fully in the next curriculum review.*

Grab 5! has been developed to provide schools with the materials, methodology and motivation to enable them to encourage their pupils (and their families) to eat more fruit and vegetables. It combines the provision of curriculum materials with support in the introduction of practical activities that encourage pupils to grow, taste, and cook and eat fruit and vegetables. The framework for this approach is both structured yet flexible, and allows schools to develop at a pace that suits their individual circumstance. Innovation is not necessarily the key to success. Much of Grab 5!'s work is a combination of tried and tested approaches including, for example, elements of the Food Dudes project developed at Bangor

University, and drawing heavily on the whole school approach (see below) developed by the Health Education Trust.

22. *Increase the number of schools participating in the Welsh Network of Healthy Schools Scheme, particularly those in disadvantaged areas.*

The Grab 5! project focuses on low income families, and is being developed in three Health Action Zones in Lambeth, Leeds, and Plymouth. The Grab 5! approach which encourages planning and review, was seen as an asset by the Healthy schools Initiative in all three areas.

27. *Estyn to consider including reference to a whole school approach to healthy eating in the inspection framework.*

We firmly believe that the inclusion of a requirement to develop, implement and maintain a school food policy within the school inspection framework is the single most important step that can be taken to embed good food practices within the education sector. FSA Wales is to be congratulated for considering this vital element of any work on healthy eating with schools.

28. *Develop nutrition-based education resources appropriate for use in the teaching of English, Welsh and Maths.*

The Grab 5! Curriculum pack already provides materials for English, Maths and a range of other subjects. Developed specifically for the key stage 2 curriculum in England we are confident it could be adapted to meet the needs of FSA Wales. We would welcome the opportunity to discuss this, alongside the possibility of producing curriculum packs for other age groups if it was thought appropriate.

30. *Develop a school model of good practice, based upon a whole-school approach to the promotion of healthy eating, including snacks in vending machines, tuck shops, school policies on snacks brought into school, school meals and school milk.*

Grab 5! has produced a model school food policy (viewable on our website – www.grab5.com) which provides guidelines for schools on how to draft a school food policy. The model policy is not prescriptive but is designed to ensure schools cover all relevant considerations – organisation, curriculum, environment, school rules, school dinners, food hygiene, water etc. - before adopting a policy appropriate for their needs.

Local food (including public sector catering)

We are pleased to note that the sustainability of the farming and food systems is acknowledged in the Nutrition Strategy. Wales has been at the forefront of several developments which will support a more environmentally sustainable farming and food supply. For example it established – before England – a target for organic farming (to reach 10% agricultural production by 2010). In addition, the Welsh Assembly clearly signalled its desire to protect Welsh agriculture from the uncertainties associated with genetically modified crops. Sustain's new project on Sustainable Food Chains focuses, in particular, on how public sector catering and local purchasing by supermarkets can contribute to sustainable development.

36. *Carry out an audit of the nutritional content of meals provided in University and College catering facilities and public sector catering facilities and produce guidelines as part of the Corporate Standard where necessary.*

In carrying out a nutrition audit, it may be more efficient to combine this with a sustainability audit at the same time. Nutrition and sustainability criteria should be compatible, and local consumption of sustainably produced fruit and vegetables is a good example of that principle. It has been argued that European Community rules effectively prohibit public sector caterers from preferring local food supplies. In fact the situation is more complex and flexible than this, and these issues are explored in four briefing papers, available on Sustain's website – www.sustainweb.org - and produced by the Sustainable Food Chains project:

- Local food: benefits, obstacles and opportunities;
- The English RDAs: What are they doing to support sustainable food economies?
- Public sector catering: Opportunities and issues relating to sustainable food procurement;
- Public procurement of sustainable food: Current, planned and related initiatives.

FSA Wales is probably aware of work being undertaken by the Foundation for Local Food Initiatives, funded by the King's Fund, in London and Powys. This research is exploring the barriers to increasing the proportion of local and organic food in meals provided in health care institutions. In addition, London Food Link (see below) is carrying out a survey for London Sustainability Exchange into the purchasing motivations of caterers, which will inform a conference in October. The results of both these pieces of work should be invaluable in producing appropriate guidelines.

46. *Work with primary producers and others to facilitate developments aimed at improving food access.*

London Food Link is a new Sustain project which has been established to undertake exactly the activity described in action point 46. In April, Food Links UK was launched as a national voice for over 30 local food links organisations, with Powys Food Links as a member. Financial support for Powys Food Link, and other emerging Food Link groups in Wales, would deliver social, health, economic and environmental benefits at the same time.

The activities of many food link groups include establishing producer networks which can supply high quality local produce in season and therefore at optimum nutritional content, not least in areas of social exclusion and poor food access. Moreover, local food systems support a diversity of small and medium sized local producers, with local produce being predominantly sold through existing independent retailers and markets. The proportion of money generated by local food enterprises and which is re-invested locally is significantly greater than money reinvested in an area after it has been spent in a non-local food enterprise. In other words, local food systems help people and communities prosper and thrive - a wonderful way to raise nutritional standards.

Labelling and advertising

21. *Take action on food labelling to assist choosing a healthy diet and work with industry on food advertising and promotion.*

Attached at annex III is a briefing document, prepared on behalf of Sustain's food labelling and marketing working party, on the importance of protecting children from unhealthy food advertising. As will be evident, Sustain has been working on this issue for a decade and, as a result of this experience, is far from convinced that the food and advertising industries are capable of voluntary restraint in this area. Indeed, at time of writing, it is our understanding that these industries have effectively vetoed work by the FSA office in London on the development of a code of practice on marketing food to children.

We are delighted that almost 80 national organisations support our view that legislation is required if children are to be adequately protected from aggressive marketing techniques encouraging them to consume excessive amounts of fatty, sugary and salty products. The list of organisations, at time of writing, is attached to the briefing document, with new organisations being added regularly. If further information is required on this issue, Sustain would be very happy to provide it.

Concluding remarks

Sustain's projects would like to add their congratulations to the well-deserved plaudits which FSA Wales has already received for its Nutrition Strategy. We hope we will be able to help FSA Wales implement many of the activities outlined in the Strategy, alongside many other partners. We also hope that FSA Wales' initiative in this area will encourage the Food Standards Agency as a whole to take a more robust approach than hereto, to nutrition policy and practice which, we believe, can play a central role in improving health, sustainability and social justice.

5 August 2002

Annex I- Details of the Community Mapping seminar on 20 September

Annex II – Synopsis of the Grab 5! Project to promote fruit and veg

Annex III – Protecting children from unhealthy food advertising: A briefing paper