

Sustain: the alliance for better food and farming

Response of the Sustainable Food Chains Working Party
to the Levett-Therivel Review of the Little Red Tractor scheme

1. Summary

- The Sustainable Food Chains (SFC) working party welcomes the report on the Sustainability Implications of the Little Red Tractor (LRT) Scheme. The working party agrees that the LRT as it currently stands does not represent an adequate basis for assuring sustainable food production and consumption.
- Ideally, the working party would wish to see an intermediary scheme linked to cross-compliance and the entry-level scheme, as well as landscape designations such as Environmentally Sensitive Areas or Natural Area categorisation. Using existing inspection infrastructure will maximise inspection efficiency and minimise administrative costs for producers.
- The development of an intermediate sustainability standard will be helpful in moving local food beyond niche marketing into the mainstream. To achieve this local food must not just be judged on provenance but also on quality, and an intermediary level would help make that explicit and valued.
- Unless quality standards are developed for sustainable foods, the development of a viable and more institutionalised sustainable food system may continue to fall foul of state aid rules.
- Given the SDC's view that Assured Food Standards is unlikely to change the LRT from its current format (in fact, new wording of some standard guidance moves in the wrong direction), the working party feels that discussions with other assurance labelling schemes should be facilitated by the SDC, to explore opportunities to enhance or improve the sustainability criteria of other existing logos.
- An intermediate level scheme should be piloted and build on existing exploratory discussions within the sustainable food sector.

2. Background to the project and working party

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

2.1.3 Sustain is independent from the agri-food industry and is funded from grants (from charitable trusts and foundations and government grants), membership subscriptions and sales of publications.

2.2.1 The Sustainable Food Chains (SFC) project is concerned with improving the food chain and its infrastructure, in ways which make sustainable food systems more viable and workable in practice; the project supports the development of more sustainable policies in public sector food procurement.

2.2.2 In common with all other Sustain projects, SFC is guided by a working party and chaired by a Sustain Trustee. This submission represents the view of the working party. (See annexe for list of working party membership).

3. Sustainable Development Commission

3.1.1 The SDC is represented on the working party but has not contributed to this submission.

3.1.2 At the working party meeting of 17th January 2005, the SDC and LRT review author Rikki Therivel gave a confidential¹ presentation on the review findings to the working party, following which the working party agreed to join the debate on next steps.

3.1.3 The SDC then set the following questions to the working party:

General comments about the report are very welcome, but it would be particularly useful to have feedback and thoughts on our where we go from here, including:

1. We call for an 'alternative' approach - if LRT represents the 'floor', and organic certification pretty much represents the 'ceiling' in terms of assurance schemes, what scope is there for a 'middle floor' umbrella of established intermediate schemes such as LEAF, Freedom Food, Conservation Grade etc?

2. How far might such an umbrella scheme go to meeting wider sustainability objectives?

3. If an umbrella scheme is not viable, does a new scheme need to be created? If so, how might this be done?

4. Whatever form any new scheme might take, there seems to be a range of important questions that would need to be addressed. These include: how could such a scheme run to encourage smaller producers subscribing? How could nutrition and health issues be included in the process? Would including criteria on both locality and supporting farmers in developing countries (e.g. Fairtrade) be compatible?

¹ As this meeting predated the report launch, members were asked not to divulge details of the presentation.

4. Commentary on the questions

4.1 'Middle Floor'

4.1.1 There is strong support (though not unanimous) for a 'middle floor' provided that, in order to achieve the standard, any particular example of food production should meet minimum criteria on all of a range of given dimensions of sustainability including animal welfare, pesticides, biodiversity, carbon emissions, labour standards, fair trade etc.

4.1.2 There may be opportunities for particular foods to exceed the basic criteria by having criteria extensions, such as for the impact of the food and its production system on the local economy at home and abroad (for imports).

4.2 Meeting wider objectives

4.2.1 Developing the profile of the 'middle floor' as a continuum beginning with LRT and ending with organic may help to minimize any sense of re-inventing a system or of adding to the information-overload which is designed to but doesn't always help consumers make informed choices. 'Shades' of achievement within the middle floor may be possible, such as 'Little Green Tractor', or having a bronze, silver, gold ranking (though see 5.7 below).

4.2.2 An intermediate scheme could be strategically important in supporting Natural Area and Environmentally Sensitive Area designations by weaving food from these areas clearly into its accreditation criteria. This would furthermore underpin other provenance quality schemes such as PDO/PGI and the notion that consumers may well find it easier to identify with messages about food from coming from and supporting landscapes, rather than from administrative areas such as regions.

4.3 A new scheme?

4.3.1 Given the SDC's view that Assured Food Standards is unlikely to change the LRT from its current format (in fact, new wording of some standard guidance moves in the wrong direction)², the working party feels that discussions with other assurance labelling schemes should be facilitated by the SDC, to explore opportunities to enhance or improve the sustainability criteria of other existing logos. Inspection bodies such as organic food organisations and the European Food Safety Inspection Service (EFSA) would need to be involved in such discussions, to help inform the development of inspection systems which minimise cost and administrative burden on farmers, and to present arguments around what can or can't be practicably verified.

4.3.2 In the case of the development of a new scheme, adequate investment will need to be made.

4.3.3 Much effort, and funding, would need to be invested in raising the profile of any new scheme. This would need to involve the public, private and voluntary sectors, along with the access of each sector to the media.

4.3.4 The more any new scheme can be reconciled with existing schemes (particularly with CAP payments/DEFRA grants inspections), the easier it will be to achieve participation in the scheme. If enterprises can get certified for (say) Green Tractor at the same time as Red Tractor (which is about getting the inspection bodies to buy into both) and any increased cost therefore remains minimal, farmers and food producers may be much more likely to invest in/join the scheme. We recognize the need to make inspections efficient and for the model for a new scheme to make use of existing inspection infrastructure, not least because the cry of over-regulation is a significant complaint from small enterprises of all kinds, especially in the food sector.

4.3.4 Given that exploratory discussions on developing a sustainable intermediate level assurance scheme have already been brokered by East Anglia Food Link and including FARMA and A Taste of Anglia, it may make sense to run a pilot in that region. In fact, a

² See Levitt – Thrivel report p. 18 covering changed wording on LRT web-site.

precursor to such partnership discussions, namely discussions on producer certification at farmers markets, has already been completed in partnership in East Anglia.

4.4 Reconciling important questions

4.4.1 Opportunities exist to merge an intermediate scheme with existing local/regional brands by persuading the administrators of local/regional brands to accept the intermediate sustainability standard as their minimum standard, together with their existing provenance requirements. Again, ideally the same inspection body could carry out provenance checks (which are ironically lacking in some existing provenance schemes) at the same time as inspecting for the Green Tractor scheme, to keep costs down.

4.4.2 An intermediate level sustainability assurance scheme will help to link provenance, quality and sustainability. The absence of this link risks the loss of provenance brand credibility since some customers of these brands assume that there are some sustainability measures involved in production.

4.4.3 A provenance brand which also included an intermediate standard would enable customers to buy food which met all of the dimensions of sustainability, including supporting local businesses (including fair prices to producers) and the local economy (especially supporting a diversity of small businesses and avoiding monopolies).

5. Discussion and general comments

5.1 Alimen Terra has submitted a proposal to SDC to lead European seminars around existing best practice in sustainability standards to help inform the UK debate.

5.2 An intermediary scheme may be very useful in informing consumers and improving standards for the multiple retail sector. Some members suggested that producers of food being sold through local alternative supply chains such as farm gate, box schemes, farmers markets, for example, or of niche foods, may sell on the basis of taste, traceability and customer knowledge of local farm practices and may not be motivated to buy in to a middle floor scheme. It is to be qualified and noted therefore, that the majority of the local food sector comprises and serves the traditional sector, consisting of wholesalers, abattoirs, independent retailers (grocers, butchers and so on) and, importantly, also serving the foodservice sector, including schools and hospitals. This is where an intermediary scheme would be very relevant and helpful.

5.3 A new scheme whose objective is to raise sustainability standards could include a range of broad, whole farm approaches (depending on the product/products) such as this example for beef and sheep:

Clean grazing to reduce and eliminate the need to treat with anthelmintics.

- Systems of livestock production with minimal changes to behavioural patterns
- Conception to finish on one farm to minimise transportation during the rearing period and cutting out stressful movements in lorries
- Low levels of stocking rates that match natural grass growth without the need for synthetic fertiliser applications
- Forage feeding with little or no concentrate input
- Rainwater harvesting in drinking ponds and off building roofs to reduce use of mains supply water

Specific criteria

- Stocking densities
- Free range criteria
- No GMOs

Other items

- Training for producers to attend training and participate in network /self help groups to increase their skills and knowledge of sustainable farming practices and systems.

5.4 Small-scale producers desperately need a system which allows them to compete in the market place in a way which rewards rather than penalizes their size and production methods. Group certification and inspections to share costs should be available, as in organic certification.

5.5 Strict criteria for processed foods made from LRT brand products should include wholesome, low fat, low salt, low sugar ingredients, no additives with a suspect safety record, and, for animal products, no mechanically recovered meat, non-traditional body parts. Fairtrade criteria should be included in the certification where this is relevant (see 4.1.2).

5.6 Environmental standards should include packaging and waste considerations.

5.7 The weakness of a ranked middle floor is that it will only ever be as strong as its weakest ranking. There is scope however, particularly in support of local food, to include dimensions which reward food mile and CO2 emission reductions, and support for local economies, which are currently not captured in existing organic accreditation.

5.8 Ultimately, the working party views domestic organic production as the most sustainable production and consumption assurance for domestically available food, while recognising that even here, organic certification does not capture all the measures of sustainability. Examples might include air miles, or the need for some land management to be geared towards landscape imperatives (including low soil fertility).

This makes the development of an intermediary level all the more useful, as organic certification remains the only sustainability assurance standard of integrity.

5.9 Note that not all members supported the development of an intermediate scheme and we value and highlight these concerns herewith. Particular concern centred around:

- ˘ the legitimacy of a new scheme, given that organic food enjoys good consumer and retailer visibility and high integrity, based on several decades of hard work by organic certification groups, not least the Soil Association;
- ˘ the costs, scale, auditing and monitoring of accreditation for a new scheme (though see 4.3.1, 4.3.4 and 4.4.1 above);
- ˘ the risk that some key groups may feel the need to focus on the development of an intermediary scheme in favour of current investment in monitoring Little Red Tractor and organic schemes, both of which should remain under considerable scrutiny;
- ˘ the need to strengthen existing systems of monitoring and trading standards so that individual local/regional schemes will have to become more robust;
- ˘ while a set of suitable standards could be drawn up for use by groups/businesses, a whole new scheme is too complicated and lacks momentum.

Ends

1st April 2005

Annexe

Membership of Sustain's working party for the Sustainable Food Chains project

Anne Dolamore, Grub Street Publishing and Vice-Chair of Sustain (Chair)

Kate Bowie, Sustain

Dr Martin Caraher, City University

Joy Carey, Soil Association

Charles Couzens, Somerset Trust for Sustainable Development

Denny Gray, Sustainable Development Commission

Vicki Hird, Friends of the Earth

Dr Karen Jochelson, The King's Fund

Jowanna Lewis, Henry Doubleday Research Association

Tania Lowry, Fairtrade Foundation

Clive Peckham, Alimen Terra

Katharine Rayner, Common Cause

Justin Sacks, New Economics Foundation

Paul Sander-Jackson, Somerset Food Links and Food Links UK

Sophie Spence, Campaign to Protect Rural England

Dr Bill Vorley, Institute of International Environment and Development

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