HOUSE OF COMMONS ENVIRONMENTAL AUDIT COMMITTEE
SUB-COMMITTEE INQUIRY INTO ENVIRONMENTAL LABELLING
Memorandum by Sustain: the alliance for better food and farming
October 2007

Contents

What is Sustain?

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 working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. See www.sustainweb.org for more details about our work.

Summary

Improved food labelling is generally understood to be one of the tools for enabling a more sustainable food and farming system. It could prompt consumers to use their purchasing power to influence the development of social, environmental, health and animal welfare values in the food system. It could help to show which products support UK farming livelihoods and the market for local food, and which support farming communities in poor countries. Provided in an appropriate format, it could also help to differentiate sustainable and less sustainable products; in turn providing added value, stimulating innovation and making sustainability a matter of competitive advantage.

The stakes are high. Food and farming are in crisis. Farming is unprofitable for many,[1] and damaging to the environment[2]. The nutritional quality and imbalance of the food we eat is putting at risk not only our physical health[3], but possibly our mental health and well-being too[4]. Food culture is disappearing fast.[5]

[1] DEFRA (2005). "Farm Business Survey: Economic report on the farming Industry", retrieved 4.9.2007, from: http://statistics.defra.gov.uk/esg/asd/fbs/results.htm

[2] Pretty *et al*. (2000) An Assessment of the total External Costs of UK Agriculture" *Agricultural Systems* Vol. 65: 113-136

[3] See numerous reports from the Department of Health over several years on the strong links between diet and illnesses such as cardiovascular diseases (such as heart disease and stroke), some cancers, type II diabetes, a number of obesity-related conditions, and poor oral health.

[4] Van de Weyer, C (2006) Changing Diets, Changing Minds: how food affects mental health and behaviour. London: Sustain

[5] Edward, R (2007). "Children 'think chips grow on farms'", retrieved 31.8.2007, from: http://news.scotsman.com/uk.cfm?id=1383902007

However, current food labelling does little to support progress towards a healthier and more sustainable food system. It is patchy, misleading, often incomprehensible[6] and therefore largely ineffective in prompting consumers to choose genuinely sustainable food and, more importantly, encouraging improvement in food manufacturing and farming practices. Despite its ineffectiveness, the number of labelling schemes purporting to show one or more aspects of sustainability – including environmental labelling – continues to proliferate, creating a confused and confusing food information landscape.

In this context, Sustain is currently working with its membership to explore how a comprehensive, comprehensible and compulsory sustainability labelling system might not only create pressure and encouragement for change to a more sustainable food and farming system, but also a way to monitor progress.

Legislation, including international trade rules should, we believe, be the servant and not the master of a sustainable food and farming system. If these rules do not allow citizens to exercise their right to know about the food they eat, and if current food labelling is disguising the true impact of food production on society and the environment, perhaps even contributing to prolonging and even rewarding damaging practices, then the rules should be changed. However, even without a change in the current regulations, there is also a great deal that could be done now, supported by a coherent programme of government and industry action, to implement the ideas outlined in this paper.

1. Recommendations

Following research for this paper[7], conversations with several organisations and specialists, and review of recent attempts at labelling schemes to support public policy objectives, we put forward the following recommendations for what is needed to improve food labelling for sustainability. We believe that what is required is:

1.1 Strong leadership from an authoritative body (such as Defra or the new Department for Business, Enterprise and Regulatory Reform – but preferably the Sustainable Development Commission or Food Standards Agency, to encourage independent standards-setting), to set the policy framework and avoid the proliferation of different labelling schemes and potential for misleading claims.

1.2 Development of comprehensive, comprehensible and compulsory sustainability labelling for food products, building on the success of the FSA's traffic light labelling for nutrition, and designed explicitly to achieve far greater sales of sustainable products and a reduction in the market for unsustainable products. Existing schemes should be encouraged to incorporate sustainability and to become involved in a process of unification in terms of shared values, process and commitment to coherent policy and standards development, with public policy goals central to their objectives. The aim should be to work towards ambitious sustainability criteria, especially relating to health, fair trade, environmental protection, reducing greenhouse gas emissions and improving animal welfare.

1.3 A clear steer to enforcement authorities (mainly trading standards and advertising controls, but also standards-setting and accreditation bodies) on the importance of coherence in sustainability information in the food sector, with guidance on enforcing what is possible in the current legal framework. A major stumbling block in, for example, realisation of the government's ambition for sustainable food in public procurement, is that many producers, food suppliers and food-service providers are unclear as to the legal implications of specificying sustainable produce. In addition, enforcement officers are unclear about definitions of local, regional and other provenance claims. Where differentiation and added value are at stake, there is likely to be anti-competitive practice

[6] National Consumer Council (2003). 'Bamboozled, Baffled and Bombarded: consumers' views on voluntary food labelling.' NCC: London

[7] Sustain would like to thank Leon Ballin, currently studying for a Masters in Food Policy at City University, for his research which informed this submission.

(or at worst fraud and loss of consumer confidence[8]), so enforcement agencies need to be enabled to measure compliance against robust definitions and have appropriate powers.

1.4 Transparency of process, with standards reflecting shared values and policy goals, helping to set a level playing field for industry. Consensus will not always be achieved, but there needs to be an opportunity for standards to be influenced by industry and civil society organisations representing the broad range of sustainability interests.

1.5 Support for smaller producers and manufacturers to meet requirements. As the 2005 Hampton Review noted,[9] the burden of meeting regulatory requirements falls especially heavily on small- and medium-sized enterprises. We note that complex assessments for food labelling, particularly provenance of multiple ingredients and greenhouse gas emission assessment (life-cycle analysis) may be prohibitively expensive for smaller operations, and particularly so for producers in poor countries. Providing practical support on these issues, and perhaps funding production of assessment methods and data sets, to be made publicly available, may help all producers to contribute towards food sustainability effectively, whilst also benefiting from new marketing opportunities and market access.

1.6 Finally, we need a range of policies to promote change. Labelling is one important factor for enabling consumer and industry change towards sustainability, as outlined in this paper. However, labelling should only be considered as one complementary component of a larger programme of work to improve food sustainability, with other factors likely to have a more profound effect, for example policies to make natural resources cost more (carbon trading, fuel tax escalator, etc.).

2. Background

2.1 Sustain's current work includes:

- Protecting children from junk food marketing;
- Encouraging sustainable food supplies in public sector catering;
- Facilitating a sustainable London food economy;
- Tackling food poverty; and
- Promoting the links between the environmental, social and economic benefits of sustainable food systems.

2.2 Unfortunately, there has not been time to consult fully with our extensive membership and networks on this submission, so it does not represent the detailed views of all relevant organisations. However, it is based on extensive research with our membership, and work we have done in the past on the issues covered by this inquiry, including a submission to a previous enquiry,[10] so we are confident that the general principles outlined are widely supported.

2.3 Although the Sub-committee's Inquiry is into environmental labelling, we have interpreted this to mean environmental in the broadest sense, and incorporating the classic three elements of sustainable development: environmental, social and economic. Sustain would be very happy to appear before the committee to expand on the detail of the issues summarised in this submission.

3. Why label?

3.1 In summary, comprehensive, comprehensible and compulsory sustainability labelling could help:

- Make visible the problems with our food system, and the solutions to those problems
- Raise public understanding of sustainability, helping to raise the stakes for business
- Stimulate demand for sustainable food

[8] One recent example of fraud saw up to 30 million battery-farmed eggs sold as 'free range'. See *The Guardian*, 16 Nov 2006, *Free range egg fraud claims prompt inquiry.* http://www.guardian.co.uk/food/Story/0,,1948791,00.html

[9] HM Treasury. Hampton Review on regulatory inspections and enforcement (2005), see: www.hm-treasury.gov.uk/budget/budget_05/other_documents/bud_bud05_hampton.cfm

[10] HCE, Food and Rural Affairs Committee, Sub-committee Inquiry into food information. Evidence from Sustain: the alliance for better food and farming, 19 April 2004

- Create competitive marketing opportunities for sustainable food
- Make sustainability an increasingly viable business proposition
- Reward good practice and discourage bad practice
- Give regulatory authorities the power to rule out bogus sustainability claims
- Reinforce the importance and awareness of independent sustainability accreditation
- Make corporate social and environmental responsibility the norm

Industry responsibility

3.2 Whilst consumers play their part in driving demand for more sustainable food, it is our firm belief that the food industry carries the bulk of the responsibility for creating a sustainable food and farming sector. As the majority of our food is now purchased in packaged form, from the major multiple retailers[11], they bear a particular responsibility to provide information about the products they sell and to take action to use their influence to reduce the most damaging practices in farming food manufacturing. Too often, parts of the food industry shirk this responsibility,[12] or present sustainable options merely as a niche marketing opportunity, with insignificant promotion and minimal explanatory labelling, and little incentive to buy.[13] This paper argues that comprehensive, comprehensible and compulsory sustainability labelling could not only reward those companies making positive change – in labelling and in the way products are produced – but also discourage inadequate labelling and failure to improve the sustainability of products on sale.

Citizens' rights

3.3 Consumers of food (all of us) pay for our food both directly and indirectly, via the taxes used to support various aspects of the food and farming system and to clear up the environmental damage caused in the process. Citizens therefore have a right to know, not only what is in the food they eat and how it is produced but also what effects its production and consumption has on their economy, environment and society, especially their own health. Government has pledged to represent citizens' interests, not business interests[14] but, so far, weak labelling regulations make shopping a series of difficult moral and safety tests. Certain areas of concern become heightened at different times for different reasons – e.g. Fairtrade Fortnight, publication of the Stern review, avian flu - creating spikes of interest (and worry), but problems associated with whole food *systems* are rarely addressed. Thus, one of our most fundamental biological drives, to eat well and safely has, despite living in a 'rich' world, become unnecessarily fraught with anxiety.

3.4 A high proportion of environmental degradation is attributable to what we eat. Our food system, for example, is responsible for between 20 and 30 per cent of greenhouse gases[15]. Arguably, labelling is the *very least* we could do to start to address such growing problems.

4. Current UK sustainability labelling

4.1 A consistently applied sustainability label applied to all food and drink products is essential to allow citizens to make informed choices and to drive the market for more sustainable food. Importantly, it can improve retailer, manufacturer and ultimately producer practices through product reformulation and a change in manufacturing, farming and distribution practices. Evidence

[11] Blythman, J (2004). "Shopped" London: Fourth Estate.

[12] Poulter, S (2007). "Food firms accused over labels peppered with lies about salt", retrieved 4.9.2007, from http://www.dailymail.co.uk/pages/live/articles/news/news.html?in_article_id=477346&in_page_id=1770.

[13] Dibb, S (2006) 'Greening Supermarkets: How supermarkets can help make greener shopping easier.' London: National Consumer Council

[14] Prime Minister Gordon Brown's speech to NCVO, retrieved 4.9.2007, from: www.labour.org.uk/gordon_brown_-_ncvo

[15] This lower figure is a conservative but authoritative figure emerging from work by the Food Climate Research Network, see: http://www.fcrn.org.uk. The higher figure is from: Tukker A, et al. (2005) Environmental impact of products (EIPRO): Analysis of the life cycle environmental impacts related to the total final consumption of the EU25, European Science and Technology Observatory and Institute for Prospective Technological studies, full draft report.

is emerging from the Food Standards Agency's traffic light nutrition labelling scheme, for example (with red lights for less healthy and green lights for more healthy foods), that manufacturers are already reformulating their products so that they can move out of the red category into amber, or from the amber category into green, thereby widening the range of healthier products routinely available to consumers and discouraging the production of unhealthy products. However, the current picture of UK sustainability labelling is less than encouraging for achieving these aims, as we describe below.

Label proliferation

4.1 There is a bewildering number of labels on an ever-increasing range of food products now available.[16] Table 1, attached as an appendix, lists just a sample of these. New labels are being added constantly to this list, potentially adding to the confusing 'noise' of information and detracting from established accreditation schemes. For example a country of origin 'tick' label was launched as recently as August 2007 by GB Choice (a farm campaign group).[17] The range of food and drink products carrying such labels is wide, but there are many inconsistencies. Food without packaging carries the least information and catering little or none.

4.2 All of the sustainability labelling schemes that we know of concentrate only on positive attributes and fail to highlight bad practice. In effect, a consumer is presented with the choice of 'neutral' and 'special' products (often at a premium price), which is in our opinion misleading, since bad practice on such issues as the environment and workers' rights is not neutral. A notable exception to this arrangement is in energy labelling for electrical goods (due to government legislation), in which products are shown with A to E ratings. Exposing the poor energy performance of certain products has encouraged most retailers to phase out the worst and promote the best, effectively shifting the whole market towards less carbon-intensive products.

4.3 Some schemes are accredited, with independent certification, offering high levels of assurance and traceability, and some are not, representing little in terms of real values and lacking transparency. Yet there is little to distinguish between such schemes, except for the most well-informed consumers who are prepared to undertake research into the issue.

Label efficacy

4.4 How consumers change their purchasing behaviour in response to labelling is variable. Some recent market research found that very few consumers recognised the Red Tractor, Freedom Foods and Leaf labels, and fewer made purchasing choices based on them, though this research was contested by the labelling organisations concerned. The Fairtrade label, by contrast, performed much better in this research on its recognisability and ability to influence behaviour.[18] The traffic light nutrition labelling system developed by the Food Standards Agency, and already implemented by several leading UK supermarkets, is easily understood and reasonably effective in shifting choices away from less healthy products.[19] Rising organic sales also testify to the positive effects of labelling and marketing communications.[20]

4.5 However, changes in consumer behaviour should not be the primary focus for judging label efficacy. Sustain believes that it is producers, manufacturers and retailers who need to change their behaviour by reformulating their products or altering production methods. Indeed, a robust

[16] Tesco website: www.tesco.com. "Talking Tesco: how we compete", retrieved 29.8.2007, from: www.tesco.com/talkingtesco/productChoice/

[17] GB Choice National Tick (label of origin) Scheme website: http://www.gbchoice.com

[18] Cole, B (2007). "Red Tractor and other labels fail to register with shoppers." The Grocer, August 6, 2007

[19] Beard, TC, Nowson, CA, *et al* (2007). "Traffic-light food labels." The Medical Journal of Australia 186(1): 19-19

[20] Smith, L (2007). Sales of organic food soar to £2bn but prices will continue to rise. The Times, September 1, 2007, see: http://www.timesonline.co.uk/tol/life_and_style/food_and_drink/article2364102.ece

labelling system, based on legislation, has already been proven to alter industry practice – and therefore consumer purchases – in the electrical white goods sector.[21] Self-regulation and voluntary approaches have been shown repeatedly to be inadequate, as the Food Standards Agency's experience with the traffic light nutrition labeling system has shown. While some have embraced the system, other retailers and manufacturers have set up a different system to compete with it – the Guideline Daily Amounts. This creates more confusion[22] despite consumers wanting consistency.[23]

5. The unacceptability of the current situation

5.1 Sustain's research to produce even the limited information in Table 1 required considerable investigation to find out what each label stands for, how the standards are set and monitored, by whom, and where their funding comes from. The majority of consumers will not, of course, have either the time or inclination to undertake such research; nor will they necessarily have the expertise to judge whether claims are accurate. We see this as a demonstration of market failure to provide consistent information, and therefore merits government action. It is our view that patchy, partial and perplexing labelling is helping to maintain an unsustainable food and farming industry, with all the associated costs to the environment, society and the long-term health of the economy.

Problems of weak and inconsistent assessment and enforcement

5.2 Currently, each label is unique in the way it is calculated, assessed and awarded. This is, of course, necessary when measuring incomparable factors such as carbon dioxide (CO2) emissions and animal welfare. It is less acceptable when comparing like with like. For example, carbon labelling has created a whole scientific and academic sub-culture in how it is assessed, quantified and displayed and yet, despite the fact that methods are still in the process of development[24], labels are already appearing on some products[25]. Similarly, all nine UK organic labels are subject to the same basic EU legislation but all have different systems of assessment and symbols, and some standards are higher than others. Other labels have been criticised as being so weak as to be meaningless. The Assured Food Standards Red Tractor labels, for example, mainly demonstrate only that producers have complied with basic standards, effectively not much more than complying with the law.

5.3 Even those companies that do break the law are likely to get away with it. As Sustain noted in its 2004 submission to the Food and Rural Affairs Committee, Sub-committee Inquiry into food information, every issue of the quarterly *Food Magazine*[26] catalogues misleading and possibly illegal labelling, and written complaints are regularly sent to the relevant local authority trading standards office. However, prosecutions for breaking food labelling laws are extremely rare. Local authority trading standards departments often do not have enough staff or money to take food companies (often major multinational firms) to court. Central government support for food law enforcement has focused exclusively (and perhaps understandably) on food safety issues such as fraud in the meat trade. Even if a court case is brought and won by a local authority, penalties for the company are weak, with low fines and precious little adverse publicity.

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[21] Sustainable Consumption Roundtable (2006). 'I Will If You Will: Towards Sustainable Consumption'. Sustainable Development Commission: London

[22] Britton, S (2007). "FSA labels 'dead in the water'", retrieved 27.8.2007, from: http://www.foodmanufacture.co.uk/news/fullstory.php/aid/2933/FSA_labels_'dead_in_the_water'.html.

[23] Brimelow, A (2007). "Public want food 'traffic lights'", retrieved 27.8.2007, from: http://news.bbc.co.uk/1/hi/health/6397187.stm.

[24] See announcement in "Food labelling" article in June 2007 edition of Defra's *Farming Link* magazine: http://www.defra.gov.uk/farm/contact/link/pdf/fl-june07.pdf

[25] Walkers corporate website (2007) 'Calculating the carbon footprint of a packet of Walkers Cheese & Onion Crisps', retreived 26.09.07, from: http://www.walkerscarbonfootprint.co.uk/walkers_carbon_footprint.html

[26] Produced by the Food Commission, London: http://www.foodcomm.org.uk

6. Rationalisation through comprehensive, comprehensible and compulsory labelling

6.1 Rationalisation is essential to gain consumer confidence and to create consistent pressure on retailers and manufacturers for change. It needs to be **comprehensive, comprehensible and compulsory.**

Comprehensive: What should be shown on a food label?

6.2 A sustainability food label should be comprehensive as possible in its scope, given the current state of knowledge, and be designed to be flexible enough to incorporate changes. As we have emphasised, sustainable development is a set of interdependent parts and over- or under-emphasis of one part will lead to a weakening of the whole approach. In addition, citizens have different priorities at different times and a label should be able to accommodate these differences. Table 2 attached lists some of these sustainability issues.

6.3 The usual objection to this approach is that there is simply no room on a label for all this information to be conveyed in a simple and attractive form, but Sustain has developed some options to demonstrate that this problem can be overcome.

Comprehensible: How can these factors be measured and conveyed?

6.4 For some of the sustainability factors listed in table 2, data is already available, being collected, and appearing on labels, while for others it is at a development stage. Collection, analysis and display of sustainability criteria is a constantly evolving process. It does not need to be, and may never be, perfect, but needs to be good *enough* to encourage producers to make and consumers to buy more sustainable food.

6.5 Any system will also need regular and independent monitoring to make sure data is kept up to date and standards are maintained. What is important is that the systems can be trusted, backed up by independent auditors and/or legislation so that, first, the complicated “back-end” of labelling can be trusted by consumers to be translated into an easy-to-understand, front of pack display; and second, that the whole of the food and farming industry complies, so that the label appears on all products, whether or not it shows the product in a good light.

6.6 For some product attributes, vegetarian labelling for example, a product either does or does not qualify for a label. However, for the majority of sustainability characteristics, they can be graded from poor, though middling, to good, with the grading as fine (five, seven or more grades) or as simple (three, like the traffic lights) as required. This grading system can encourage producers to improve, and move up the gradient, and also allow purchasers to make more sophisticated choices.

6.7 The ‘flower’ system (see Figure 1 below) that Sustain is currently investigating with its membership handles multiple sustainability criteria, allowing grading for each, with some options (such as the Fairtrade example shown in Figure 1) highlighting a specific issue. This is a work in progress for Sustain, and comments are very welcome.

6.8 Each petal of the flower represents a different factor of sustainability. Using a version of the ‘traffic light’ system each petal can have a value associated with it (red=poor, amber=improving, green=good). Colours allow for rapid and clear assessment by consumers and clear signals to the food industry. To emphasise a particular factor the centre of the flower can contain a sustainability symbol without losing the detail of the full range of factors. In Figure 1, Fairtrade is emphasised and this helps consumers to understand the balance between long-distance fairly traded goods and greenhouse gas emissions.

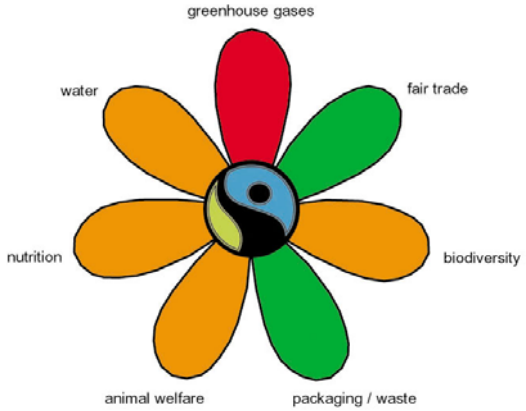

Figure 1: Representing multiple sustainability factors. Several petals of a flower, representing different sustainability issues, reflect the balance of concerns, with a 'traffic light' grading for each issue. Unique aspects of the labelled product can also be given additional prominence (in this case Fairtrade).

6.9 An alternative method is to represent scores both by colour and relative sizes of the petals (see Figure 2). This may help consumers to understand at a glance that green petals represent a full score, and that red petals represent a poor score, since there is 'room for improvement'.

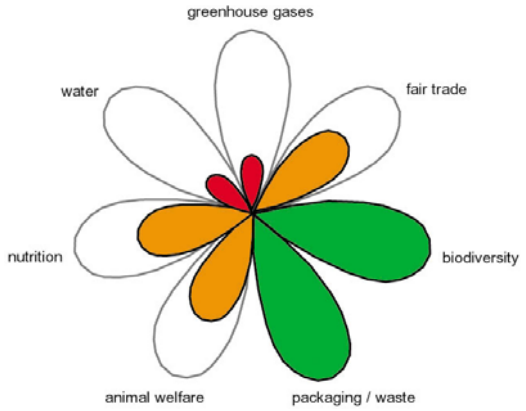

Figure 2: Alterations to the basic format of the flower in Figure 1 can give greater or less emphasis to certain issues.

Compulsory: Voluntary approaches do not work

6.10 Research shows a small number of products fail even to carry the legal minimum information[27] and that that parts of the food industry remain unwilling to provide accurate, full and clear information. Self-regulation is promoted by the food industry as a viable alternative to legislation,[28] and has been the preferred policy choice of governments for many years. This is despite evidence accumulating in a number of different fields that it does not work. A Sustain report examined the failure of self-regulation in children's food advertising, tobacco and alcohol promotion, controls over fishing, breast milk substitutes, the use of pesticides and antibiotics in farming and supermarket power.[29] There is little to suggest food labelling will be any different.

6.11 Voluntary codes are often weak and the commercial incentives not to comply are strong. Indeed, companies will be at a competitive disadvantage if they reveal more than their rival firms and, by its nature, non-compliance within a voluntary code carries little risk.

[27] Organix (2004) 'Carrots or Chemistry? Snacking and child health.' Organix: Christchurch, see www.babyorganix.co.uk. This survey found 10% of children's snack products had no weight declaration

[28] Food Quality News website (2006). "Food sector lobbies for more labelling self-regulation", retrieved 3.9.2007, from http://www.foodqualitynews.com/news/ng.asp?n=68606-ciaa-labelling-packaging

[29] Children's Food Campaign (2005). 'The Children's Food Bill: Why we need a new law, not more voluntary approaches.' Sustain: London

7. International trade

Food miles vs. fair trade

7.1 Currently, a much discussed problem is the potential conflict between shortening food miles and promoting fair trade. The role of food transported by air in a sustainable food and farming system has been the subject of a major and extensive consultation exercise by the Soil Association[30]. Whatever the outcome of this pioneering attempt to reconcile two vital issues – development and climate change – improvements in both areas will continue to be needed from the food and farming industry, and people will continue to want to know how much progress is being made and by whom. A labelling system similar to the "flower" scheme shown in Figures 1 and 2 could accommodate this information.

7.2 It is also worth noting that, at the moment, all Fairtrade products are tropical and so, by definition, are impossible to buy locally. The majority are also transported by ship (which generates considerably less carbon dioxide than aircraft) so there is much less conflict between economic development, and tackling climate change than it would sometimes appear from confrontational media coverage.

7.3 Another aspect of fair trading, both domestically and internationally, is how the costs of sustainability labelling will be covered and by whom. The danger is that, as with other costs in the food system, they will be passed down the food and farming chain to the smallest and weakest producers that are least able to bear them. Clearly this will not be acceptable, and indicates another clear reason for government intervention.

World Trade Organisation (WTO) rules

7.4 Food and farming issues have been at the root of the collapse of WTO agreements and, since the talks stalled in Doha over four years ago, little progress has been made. It could be argued therefore, given this disarray, that concerns over sustainability labelling being an infringement on or coming into conflict with WTO rules are a diversion. What is important is the sustainability of a food and farming system for a healthy society, a robust environment, and a thriving economy. WTO trade rules should be designed to fit this imperative, and not the other way round.

7.5 At the same time, global ambitions for a sustainability label would create real comprehensiveness and help to encourage a global sustainable food and farming industry. This is not an unachievable pipe dream. The Marine Stewardship Council's accreditation system and logo operates globally, and is an example of good practice in this area.[31] Some regional/national variations on a sustainability label would be inevitable, but a simple recognisable system that can be understood and adhered to globally is the ideal.

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October 2007

[30] The Soil Association airfreight consultation web page is at: http://www.soilassociation.org/airfreight

[31] Constance, DH and Bonanno, A (2000). "Regulating the global fisheries: WWF, Unilever, and the Marine Stewardship Council." Agriculture and Human Values 17(2): 125-139.

TABLE 1: EXAMPLES OF TYPES OF LABEL SHOWING ONE OR MORE ASPECTS OF SUSTAINABILITY

Label	Aspect of Sustainability	Products/Licensees	Who runs it?	Regulated	Comments
Carbon Trust	Environmental	Around 20 food products (trial)	Private company, set up by Government	No	Currently working with the British Standards Institute, Defra and others to develop robust methods for measuring greenhouse gases (GHGs) from food and farming system, since methane and nitrous oxide, as well as carbon dioxide, are important.
LEAF (Linking Environment And Farming)		Waitrose fresh produce, among others	Charity	No	Funding sources not clear from the website, though historically LEAF has been funded by agrichemical companies. Aims to reduce, not stop, pesticide use. Compliance often monitored by users. Farm focused.
Marine Stewardship Council		19 retailers, processors and distributors, hundreds of products, and a schools programme	Charity	No	Well respected in business and science, global in scope and accompanied by strict monitoring of fisheries.
Organic 9 UK labels plus many in EU	There are many overlaps. Organic covers several, though not yet all, sustainability factors under a single name	Over 7,000 producers, growers, processors and importers	Varies. Private, charities and, in the case of the EU label, government	EU and UK law on organic food and farming	Fast growing sector. Some labels have higher standards, e.g. for animal welfare, than others. The Soil Association is the largest and best known certifier. Basic EU law is considered too weak by some.
Fairtrade	Economic Overlaps: Fairtrade combines social and economic factors	2,000+ products	Private offshoot of Fairtrade charity	No	Generally labels tropical goods imported into OECD. Well promoted, recognised and respected. Some businesses prefer their own “equitable trade” schemes, but not all are independently audited.
Farm Assured 11 different labels		78,000 farmers, 350 processors and packers	Industry organisation. Science and government as observers.	No	Ensures legal minimum farm standards for fresh produce inc. meat. Sometimes appears as “Red Tractor” on labels. Criticised by some consumer and environmental groups for weak standards.

Label	Aspect of Sustainability	Products/Licensees	Who runs it?	Regulated	Comments
Traffic Lights	Social, including health Overlaps include high animal welfare standards; may also reduce food safety risks.	Significant and growing number of retailers and manufacturers	Government via the Food Standards Agency	No	The Food Standards Agency has set out clear rules for any company wishing to use this label, but it remains voluntary. Backed by body of research showing consumers can understand and use it. A number of major retailers and manufacturers are promoting a competitor system – Guideline Daily Amounts.
Freedom Food		2,220 members (not products). All major retailers stock some products, usually eggs.	Charity	RSPCA UKAS accredited	The Royal Society for the Prevention of Cruelty to Animals is well known and respected. However, some consider the Freedom Food standards to be too low.
Vegetarian		5,000 products	Charity	No	Vegetarian Society label is popular, as law about what can be labelled 'vegetarian' is weak. Many 'V' symbols on supermarket own-brand and proprietary brands are not accredited, and have differing meanings. The Vegetarian Society label and V symbols are well recognised, though what is vegetarian is disputed by some groups.
Other labels include, for example: – Air Freight (on fresh produce in M&S and Tesco), Dolphin Friendly (tuna), Glycaemic Index, Lion Quality (eggs), White & Wild (milk), plus charity symbols such as Bone Friendly, Orangutan Friendly, Family Heart Association, and many, many others					

TABLE 2: INFORMATION ABOUT ELEMENTS OF SUSTAINABILITY THAT SOME CITIZENS MAY WANT TO SEE ON A FOOD LABEL

The terms "local" and "organic" do not appear in this table because we have itemised the elements of these terms that make them important for sustainable development e.g. greenhouse gases, biodiversity and soil quality.

<table>
<tr><th>Aspect of Sustainability</th><th colspan="2">Issues relating to food system</th></tr>
<tr><td>Economic</td><td colspan="2">Fair trade/human rights
Local economic development, both domestically and abroad</td></tr>
<tr><td rowspan="2">Environmental</td><td colspan="2">Greenhouse gases (carbon dioxide, methane, nitrous oxide)
Biodiversity: wild and farmed (inc. marine)</td></tr>
<tr><td>Natural Resources</td><td>Land: Rural landscape, soil fertility, natural features
Water: Conserving use, pollution of
Air: Pollution
Non-renewable resources: Mineral extraction, waste (packaging and food)</td></tr>
<tr><td rowspan="2">Social</td><td>Nutrition

Health</td><td>Macro-nutrients: Too much (salt
fat, sugar) or too little (fibre, omega 3)
Micro-nutrients: Vitamins, minerals, trace elements

Residues: pesticides, hormones, antibiotics
Additives: health and behaviour,
Processes: GM, animal feedstuffs, BSE etc.</td></tr>
<tr><td colspan="2">Animal Welfare

Culture: Local distinctiveness, unique/special skills, food culture and traditions</td></tr>
</table>