



School Food Standards: A submission to the School Food Plan **Government should invest £43 million of school food money in sustainable fisheries**

February 2013

Sustainable Fish City is the campaign to make the UK's towns, cities, institutions and communities the first in the world that buy, serve and eat only sustainable fish. We aim to change the market for sustainable fish, in order to support sustainable fishing practices and robust marine conservation. Sustainable Fish City was developed and is run by Sustain and advised by a working party comprising expert bodies including the Marine Conservation Society, the Marine Stewardship Council, Pisces Responsible Fish Restaurants and SeaWeb's Seafood Choices. Sustainable Fish City also has the support of the Environmental Justice Foundation, Fish2Fork, Hugh's Fish Fight, Greenpeace and the Food for Life Catering Mark, and Raymond Blanc OBE is our sustainable fish ambassador.

We ask businesses, government and institutions to commit to our understandable, achievable and simple-to-promote pledge: "exclude the worst, promote the best and improve the rest" (see www.sustainweb.org/sustainablefishcity/sustainable_fish_pledge/). We work with participating organisations to make that pledge a public commitment, provide model contract clauses and detailed advice, and then refer organisations and catering teams to the necessary support to implement change, or provide it ourselves. We then help participants spread educational messages about sustainable fish to their own communities of colleagues, clients and students.

In 2009, Sustain (working with partners) persuaded the London Organising Committee of the Olympic and Paralympic Games (LOCOG) to adopt a sustainable fish policy. Since the launch of the Sustainable Fish City campaign in January 2011, we have already received pledges to serve sustainable fish from organisations together serving well over 100 million meals per year.

Summary

In June 2011 the Coalition Government adopted mandatory sustainable fish standards for one third of public sector catering, including Whitehall, MPs, HM Prison Service and parts of the armed forces¹. These sustainable fish standards were incorporated into the Government Buying Standards following the adoption of rigorous mandatory sustainable fish standards by the London Organising Committee of the Olympic and Paralympic Games (LOCOG)². As a result of this work the 2012 Olympic and Paralympic Games were the first in history to display the Marine Stewardship Council eco label.

The Coalition Government should be applauded for introducing these mandatory standards, for fish with an estimated value of £17 million. It shows that government recognises the dire state of the world's oceans and the public sector's role in ensuring public procurement not only

¹ Government Buying Standards were issued in June 2011:
<http://sd.defra.gov.uk/advice/public/buying/products/food/>

² London Organising Committee of the Olympic and Paralympics Games Food Vision, published December 2009:
<http://www.london2012.com/documents/locog-publications/food-vision.pdf>

‘avoids the worst’ – Marine Conservation Society red list fish – but also ‘promotes the best’ – Marine Conservation Society green list and Marine Stewardship Council certified fish.

However, these Government Buying Standards do not yet cover schools. Schools in England spend over £43 million³ on fish a year, so extending these existing mandatory sustainable fish standards to schools would ensure these public funds are invested in sustainable fisheries.

To be effective, this investment cannot rely on voluntary approaches such as promoting good practice and issuing government guidance, which has been shown to have failed on numerous occasions in the past⁴. Legally binding sustainable fish standards are achievable and are being achieved in many parts of public sector procurement. To fail to introduce them for schools – thereby raising the prospect that future generations of schoolchildren will be unable to eat fish, as stocks will be exhausted – would be morally indefensible.

Why regulation?

- The current system for purchasing fish served in schools does not support sustainable fisheries, and may indeed encourage perpetuation of unsustainable fishing practices.
- This problem is likely to increase as more schools are encouraged to become independent of local authorities and to commission catering independently.

The current system does not support sustainable fisheries

In replies sent to 420 concerned citizens asking for mandatory sustainable fish standards for food served in schools in November 2012, the Government made the following comments as justification for not adopting mandatory fish sustainability standards for school food⁵:

“The Soil Association’s Food For Life Catering Mark (Bronze, Silver and Gold), which has been awarded to a number of school caterers, including local authorities, requires holders not to serve fish from the Marine Conservation Society’s *Fish to Avoid* list.”

The Soil Association’s Food For Life Catering Mark is an outstanding voluntary scheme which, in terms of sustainable fish, has ‘avoiding the worst’ at its Bronze level and excellent standards for ‘promoting the best’ at Silver and Gold levels. However, only 4,300 schools out of some 24,605 schools are part of the Food for Life scheme in England⁶. This is 17.5% of all schools and, while it is a remarkable achievement by a group of charitable organisations, it is no substitute for a comprehensive policy on sustainable fisheries by the Department of Education.

The Food for Life Catering Mark was set up with a £16.9 million grant from the BIG Lottery Fund, which ceased in 2011. Food for Life is currently funded by a £1 million extension grant

³ The Central Buying Consortium bought approximately £850,000 of fish across 486 schools. This is the equivalent of £1,749 per school. £1,749 multiplied by the 24,605 schools in England equals £43,034,145 per year spent on fish. See appendix 2 for the source of this figure.

⁴ Yet More Hospital Food Failure, March 2010. Sustain: <http://www.sustainweb.org/publications/?id=181> The report identified £54 million spent on failed food guidance from government in the preceding decade.

⁵ See appendix 1 for a copy of the latest response sent by the Department of Education to an e action calling for mandatory sustainable fish standards for food served in schools

⁶ Food For Life Partnership website: <http://www.foodforlife.org.uk/Whygetinvolved/Ourimpact.aspx>

from the BIG Lottery Fund and in future will rely on paid commissions from local authorities⁷. In the current context of cuts to government budgets at both national and local level, funding for this charitable scheme is more likely to shrink than grow, with a corresponding fall in the number of schools covered by their standards.

The Government reply also noted:

“Schools and local authorities can access a range of contracts and frameworks, which include many sustainable fish products. Available products include; multiple species of fish such as oily fish; uncoated fish, fish fingers and prawns. Details of the frameworks are available from Pro5 website: www.pro5.org.”

Our research has uncovered a number of significant problems with this response. Four buying groups make up Pro 5: Central Buying Consortium, Eastern Shires Purchasing Organisation, North East Purchasing Organisation and Yorkshire Purchasing Organisation. We therefore asked these four buying groups a series of questions to assess the sustainability of the fish they buy, with their responses summarised in Appendix 2. With the exception of Central Buying Consortium, who serve just 1.9% of schools in England, the answers to our questions (where they were given) clearly indicated to us that standards for the sustainability of fish were not being included in the tenders for supply of these contracts and no monitoring was taking place of the sustainability of fish being bought through these contracts.

The Department of Education cannot, therefore, claim these Pro 5 contracts are designed to support sustainable fisheries, nor that these are an effective policy response to an issue of global sustainability concern.

This problem is likely to increase as more schools are encouraged to become independent of local authorities, for the following reasons:

As noted above, only one Pro 5 member, the Central Buying Consortium covering 1.9% of the schools in England, is currently enforcing any standards on sustainability of fish. The Central Buying Consortium food purchasing is run by Hampshire County Council and of the 486 schools using that buying service 471 are in Hampshire. However, the Government is encouraging schools to opt out of local authority services like this. In effect, for sustainable fish, government is encouraging schools to opt out of what it describes as good practice.

The Marine Stewardship Council is an independent charitable organisation that sets standards for sustainable wild-capture fisheries, and currently certifies over 10% of the world's wild-capture fisheries. In the United Kingdom 4,100 schools have joined the Marine Stewardship Council's chain of custody scheme⁸. As part of the scheme the schools are also enrolled in the Fish and Kids education project which promotes a range of sustainable fish issues. However only one of the schools out of the total of 4,100 that works with the Marine Stewardship Council is operating independently, i.e. their catering is not under central local authority control. Once again, government policy appears to be encouraging schools to opt out of the services that support good practice.

⁷ Information from the Food for Life website <http://www.foodforlife.org.uk/Aboutus/FAQs.aspx>

⁸ Serving Marine Stewardship Council certified fish is a mandatory standard of Food for Life Silver so many of these certified schools are included in the 4,300 Food for Life schools.

Similarly, the majority of schools in the excellent Food for Life scheme described above are part of a local authority centralised catering contract. A process of opting out of local authority services, coupled with downward pressure on funding for Food for Life, is likely to lead to fewer, rather than more schools being covered by these standards.

What would mandatory standards for sustainable fish in schools look like?

Sustainability standards for fish are not complex, have already been successfully introduced by many schools (but only a minority, and with help from a number of charitable organisations) and have already been incorporated into legally binding Government Buying Standards. We therefore recommend that, as part of the school food review, government enacts regulations to:

- Prevent Marine Conservation Society red list fish being served to school children;
- Ensure any fish served to children be either Marine Stewardship Council (or equivalent ISEAL standard) certified;
- Ensure fish – if not certified as above – will be Marine Conservation Society green listed and traceable to capture area, stock detail, capture method or farming method.

Conclusion

Government has already implemented rigorous mandatory standards to ensure sustainable fish is served in Whitehall, to MPs, HM Prison Service and parts of the Armed Forces. It is surely right that the £43 million spent by schools on fish should also support sustainable fisheries. This measure is sensible and proportionate to the scale of the problem facing the world's fisheries, with 87 per cent of wild-capture fisheries either fished to full capacity or over-fished, and with the 2012 UN State of World Fisheries and Aquaculture report showing that the situation is getting worse⁹. To fail to introduce mandatory sustainable fish standards is tantamount to government accepting that £43 million of public money should continue to be invested in fishing practices that perpetuate the destruction of precious fish and marine wildlife, hence jeopardising the chances of future generations of children to be able to eat well.

There are examples of good practice in schools on a large enough scale to demonstrate that these standards are practical and affordable and can be extended to all schools. However, it would be irresponsible to rely on this good practice spreading, since there is no evidence that it does so, and indeed plenty of evidence that it has not, over many years. Only in exceptional circumstances does some limited change happen. This is usually either with support from charitable organisations (with funding for such initiatives being far from secure), or when schools are part of central catering contracts run by local authority services (which are also currently being undermined), and where a progressive procurement officer or local authority procurement policy secures a contractual obligation for the supplier to provide sustainable fish (which is not always the case). Such piecemeal policy puts fish conservation in serious jeopardy.

⁹ For a summary of the 2012 UN FAO State of World Fisheries and Aquaculture report, see: <http://www.fcrn.org.uk/research-library/fish-and-fisheries/aquaculture/state-world-fisheries-and-aquaculture-2012>

Appendix 1

A copy of the latest response sent by the Department of Education to an e-action calling for mandatory sustainable fish standards for food served in schools:

Dear Mr Walker

Thank you for your email of 26 October, addressed to the Secretary of State, Henry Dimbleby and John Vincent, about serving only sustainable fish in schools. I have been asked to respond on their behalf.

The Department believes that schools should be able to make their own decisions about their day to day running. Schools and local authorities are responsible for their school meals service and for procuring the food served.

However, we also appreciate that sustainability is an important issue. The Soil Association's Food For Life Catering Mark (Bronze, Silver and Gold), which has been awarded to a number of school caterers, including local authorities, requires holders not to serve fish from the Marine Conservation Society's *Fish to Avoid* list.

Schools and local authorities can access a range of contracts and frameworks, which include many sustainable fish products. Available products include; multiple species of fish such as oily fish; uncoated fish, fish fingers and prawns. Details of the frameworks are available from Pro5 website: www.pro5.org

Therefore, whilst there may currently be no requirement on schools to serve only sustainable fish, there are already schools which do so.

On 4 July 2012, the Secretary of State asked Henry Dimbleby and John Vincent to develop the School Food Plan, with the aim of accelerating the improvements that have been made in school food over the last few years. Next year they will produce an action plan that shows how pupils eating in schools in England can be offered nutritious, good-tasting food and how they can receive an education which cultivates an understanding of food and nutrition.

Mr Dimbleby and Mr Vincent both have a strong interest in sustainable food. They are co-founders of Leon, which is a founding member of the Sustainable Restaurant Association. Mr Dimbleby and Mr Vincent are considering the issue of sustainability as part of their work on the School Food Plan.

As part of our commitment to improving the service we provide to our customers, we are interested in hearing your views and would welcome your comments via our website at: www.education.gov.uk/pcusurvey

Yours sincerely
Public Communications Unit

Appendix 2: Questions about fish sustainability to the four Pro 5 buying groups, and their answers				
Question	Central Buying Consortium	Eastern Shires Purchasing Organisation	North East Purchasing Organisation	Yorkshire Purchasing Organisation
Were there any sustainability criteria in your last tender for fish?	No direct answer although we assess that there are sustainability criteria behind some of the products	No answer	No answer	No, there were none
How many schools in England are using your purchasing contracts for frozen or fresh fish?	486 = 1.98% of the total number of schools in England	No answer	No answer	1,700 = 6.9% of schools in England
What percentage of the total number of frozen fish products available to schools through your contract are: <ul style="list-style-type: none"> • Marine Stewardship Council (MSC) certified? • Or if not MSC certified, are Marine Conservation Society green rated? 	Some of it	No answer	No answer	No answer
What is the total value of frozen or fresh fish products that schools bought through your contract for the last twelve months that are: <ul style="list-style-type: none"> • Marine Stewardship Council (MSC) certified? • Or if not MSC certified, are Marine Conservation Society green rated? 	No answer. However, Sustain knows from discussion with the Marine Stewardship Council and others that some lines are Marine Stewardship Council certified and some are Marine Conservation Society green rated	No answer	No answer	No answer
What is the total value for all frozen and fresh fish products that schools bought through your contract in the last twelve months?	Over £850,000	No answer	No answer	No answer

How do schools identify from your supplier which of your frozen or fresh fish products are Marine Conservation Society green rated?	The wholesale supplier, 3663, is providing rating information for Food for Life and Government Buying Standards when requested, but this information is not provided as standard	No answer	No answer	YPO do not get involved in this. It is up to each of the 1,700 schools to find out for themselves
How many schools in England are buying tinned tuna through your contract?	486	No answer	No answer	1,700
What proportion of your tinned tuna bought through your contracts is caught with the combination of purse seine nets and Fish Aggregation Devices (FADs)*?	70% is caught with purse seine nets, some with FADs*: Supplier Ivory Le Doux	No answer	No answer	70% via Ivory Le Doux caught with purse seine nets and FADs*. 30% via Caterers Choice the majority of which is caught with purse seine nets and FADs*. Total value of all tuna purchases approximately £850,000
*Note: The combination of FADs and purse seine nets are an unsustainable catch method that destroys other marine wildlife and non-target fish species				



Sustainable Fish City is a campaign coordinated by Sustain, and supported by the Good Catch initiative, Marine Conservation Society, Marine Stewardship Council, Pisces Responsible Fish Restaurants, Seafood Choices Alliance and many others. Contact: fish@sustainweb.org

 www.sustainablefishcity.net 

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