

**London Food Link, Sustain:
Comments on the draft London Food
Strategy**



London Food Link and the wider Sustain alliance team, warmly welcome the Mayor of London’s draft London Food Strategy. We look forward to helping champion and implement this, for the benefit of all Londoners, as well as the food producers, farm animals and environment that feed the capital. We especially welcome the integration of food strategy ambitions into a wide range of Greater London Authority policies and strategies, as achieving good food needs action on many fronts.

In this document we provide an overview of our comments for use by our supporters and friends. These have been gathered through discussion and conversation during the consultation and before.

Below, we have responded to the consultation questions, then give additional commentary in relation to the various chapters of the draft London Food Strategy.

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Responses to London Food Strategy consultation questions

(i) Are the six priority areas the right ones? Are there other priorities that should be considered?

The six priority areas are a sensible and easily communicable way of organising ideas and coordinated action for implementation of the London Food Strategy.

We believe the 'settings' approach will also help people to understand how and where they can take action to help achieve a healthy, fair and sustainable food system for London.

There are some areas that we think do deserve higher priority within this structure including:

- Good food and planning
- The environmental issues associated with our food system, and how these will be tackled
- More focus on schools
- Reference to other strategies

(ii) Are the most effective actions the Mayor, external stakeholders and individuals can take set out? Are there other actions that should be included?

In the main, yes. We would welcome bolder, clearer actions on the following:

- There is already strong support for London Living Wage but we would like this to be extended to explicit encouragement and influencing by the Mayor of London for businesses, contractors and boroughs to do the same, as we have been championing through our Good Food for London Report, as a key way to tackle food poverty.
- Building on the recognition of the right to food, and support for Beyond the Food Bank by making a clear statement that diverting food surplus to people in need is not the solution to food poverty. We want London to take a strong stand against the institutionalisation of food waste being used to delay or avoid action to address the root causes of food poverty. We would also welcome the opportunity for the Mayor to work with London Food Link and Sustain on our emerging 'hierarchy of tackling food poverty', which (like London's Food Waste Hierarchy) could guide decisions by communities, businesses and policy-makers, and help everyone focus on tackling the root causes and reducing the incidence of food poverty and hunger.
- More focus on good food and planning across the board but particularly in terms of retail and food growing, with a commitment to look at the London Plan but also how planning is implemented and used to create and foster good food environments.
- More focus on schools, particularly secondary schools and how to tackle the targeting of school children with junk food, which currently undermines many of the healthy eating initiatives trying to improve the diets and health outcomes of young people.
- Clearer recognition of multiple benefits of food growing, protection of existing community food growing and more on the huge potential for food production in London's Green Belt.
- An explicit statement on the type of farming and food supply that London seeks to promote i.e. agro-ecological/low environmental impact and diverse farming systems with shorter supply chains and fair terms of trade. Also with imported food meeting ethical and sustainability criteria and supporting food producers in developing countries, e.g. products accredited as Fairtrade.
- Clearer actions on how the Mayor can improve the environment through food supply and influencing diets, for example by improving the environmental impact of food served in institutions and sold via London's retail outlets, and increasing buyer and consumer awareness.

Some comments below on some additional detail and additional areas of work, particularly that the Mayor could lead or champion.

(iii) What are your views on the proposed ban of advertising of food and drink that is not healthy across the Transport for London estate?

Sustain and London Food Link strongly support the proposed ban on advertisements for junk food and sugary drinks (HFSS – high fat, salt and sugar foods and drinks) across the Transport for London

(TfL) network. Sustain's Children's Food Campaign is an alliance of national health, medical, children, parents, teachers and education groups. Together, we have campaigned for many years to improve children's food and food education. Importantly, we have also campaigned for restrictions on unhealthy food advertising and promotion to children and young people.

It is this sort of bold leadership that London needs to take in order to help parents introduce children to healthier preference and eating habits. This builds on, and goes further than, existing precedents in other European cities, such as Amsterdam, where since 1 January 2018, no junk food ads likely to appeal to children or teenagers are allowed to appear anywhere on the municipal subway system. We strongly support the proposal to ban individual HFSS product adverts across TfL's advertising inventory; also to address the growing trend towards broader brand advertising by confectionery, snacking brand and unhealthy fast food outlets and include brand advertising in scope for the ban. Implementation will require guidance on what constitutes not just an HFSS product, but criteria for a brand advertisement that is likely to have the same effect as an HFSS product ad. For example, adverts directing TfL users in tube stations or at bus stops to the nearest fast food outlet, where such outlets have a high proportion of HFSS foods on the menu, as this is likely to have the same effect as advertising HFSS products. Sustain, and members of our Children's Food Campaign in particular, are well placed to support and contribute to any consultation or the development of such guidance.

We believe that London taking a stand against unhealthy food marketing would send a clear signal to the capital's young people that their health matters, and incentivise food and drink manufacturers that it is time to shift marketing towards healthier diets and reformulation of products to have a healthier nutritional profile.

We believe this bold move will also provoke a big conversation in our city – indeed probably in cities throughout the UK and internationally – about the type of food and food system we want to achieve. To avoid such a move being seen as tokenistic, it is essential that this is presented in the context of the whole London Food Strategy. It is also helpful that the focus is on children, as there is a clear argument for intervention and children deserve our protection.

(iv) What are you or your organisation doing to support good food in London? What best practice already exists in the priority areas?

In London – the activities of London Food Link contribute to the overall vision of a better food system and help deliver individual projects to achieve this, including:

- **Capital Growth**, London's network of over 2,700 community food growing spaces – we offer support, training, networking, development opportunities, impact measurement and sometimes a conduit for funding for food growers.
- **The Jellied Eel magazine and London Food Link** network, which runs Urban Food Fortnight and supports the Urban Food Awards to help London's food enterprises to flourish.
- **London Food Poverty Campaign**, supporting London Boroughs to make progress on tackling the root causes of food poverty, for example by paying the London Living Wage; and moving 'beyond the food bank' as a response to hunger. We publish annual maps and a league table illustrating which boroughs are showing leadership, and where there is more work to do.
- **Good Food for London**, which supports London Boroughs to make progress on implementing healthy and sustainable food policies and publishes annual maps and league tables illustrating which boroughs are showing leadership, and where there is more work to do.

In particular we think there is more work need to focus on borough Food Partnerships and the work of Sustainable Food Cities in London and London Food Link would be keen to help support this.

Nationally, with direct relevance to the London Food Strategy, Sustain runs or helps to coordinate:

- **Sustainable Food Cities**, supporting over 50 towns and cities around the UK, including several London Boroughs and the Greater London Authority itself, in their work to achieve a healthy, fair and sustainable food system, working at a city level and running city awards.
- **Food Power**, supporting over 45 towns and cities around the UK, including several London Boroughs, in their work to implement strategies to tackle the root causes of food poverty.

- **Sugar Smart**, supporting local groups around the UK, including 15 in London, to reduce the availability and promotion of sugary foods and drinks in their area.
- **Growing Health**, working to see how community food growing can be routinely used by the health and social care services as a way of promoting health and wellbeing.
- **Sustainable Fish Cities**, working with 16 cities around the UK, including London, persuading public and private sector caterers to serve only verifiably sustainable fish.

Nationally, Sustain also coordinates work on measures to improve food, agriculture and fishery policies and practice that would improve provision and availability of healthy and sustainable food for everybody. Some examples of Sustain's national policy work that could benefit London are:

- **End Hunger UK campaign** – working with others, we are seeking a national requirement for the measurement of household food insecurity, which would in turn require national and local action to tackle the root causes of food poverty;
- **Right to Food campaign** – seeking to instate into UK law the UN Sustainable Development Goal of ending hunger. This would require action at national and local level;
- **Agriculture policy work** – we are arguing, for example, for UK agriculture policy to be governed by principles of public health and environmental protection – to improve the public health benefits of what is grown, and how and where it is grown;
- **Campaign for Better Hospital Food**, which is seeking national mandatory health and sustainability standards for food served in all NHS hospitals, for patients, staff and visitors;
- **Children's Food Campaign and Parents Jury**, which are seeking to achieve restrictions on unhealthy food advertising and marketing to children.
- **Food Co-ops** – supporting local communities (currently with a focus on students) to run co-operative enterprises to improve access to healthy and affordable food.
- **Campaign for a Better Food Britain** – Sustain's coordination of activities in response to Brexit - seeking to ensure the best outcome for healthy and sustainable food, farming and fishing.

(v) How could you or your organisation support the Mayor to do more to achieve good food for London and pledge to support the final strategy?

Sustain and London Food Link are committed to make our alliance work support the success of the London Food Strategy, one way or another – whether that support is manifested at community, borough, city or national level. The Sustain and London Food Link projects listed in response (iv) above illustrate the breadth and depth of our expertise, reach, and opportunities to contribute to implementation of the London Food Strategy. Sustain and London Food Link will continue to develop campaigns, initiatives and projects that help the implementation of the London Food Strategy's aims and to find ways to disseminate and share information through our London Food Link network. We welcome the opportunity to use our London Food Link network to share and get feedback on the strategy. Our network members and supporters cover the breadth of the issues in the strategy across the whole of London and help to amplify their impact and hence contribution to beneficial outcomes.

(vi) Is the strategy inclusive and does it consider the needs and priorities of all Londoners?

In general, yes. There is perhaps a need to think more about involving 'experts by experience', most especially in understanding, designing and implementing long-term solutions to food poverty. There is also little mention of some of the most vulnerable groups, particularly in Chapter 1 and it would be good to see how the Mayor wants to help address issues faced by older people, homeless or refugees and asylum seekers to name a few of those who can be particularly at risk.

Overview: London Food Link response

London is an international city and a signatory to the Milan Urban Food Policy Pact and so our audience is the world and it is great to see the Mayor taking leadership in this context. We welcome some of the bold actions proposed but feel that the strategy could take stronger leadership in some areas.

These include:

- There is already strong support for **London Living Wage** but we would like this to be extended to explicit encouragement and influencing by the Mayor of London for businesses, contractors and boroughs to do the same, as we have been championing through our Good Food for London Report, as a key way to tackle food poverty.
- **Building on the recognition of the right to food**, and support for Beyond the Food Bank by making a clear statement that diverting food surplus to people in need is not the solution to food poverty. We want London to take a strong stand against the institutionalisation of food waste being used to delay or avoid action to address the root causes of food poverty. We would also welcome the opportunity for the Mayor to work with London Food Link and Sustain on our emerging 'hierarchy of tackling food poverty', which (like London's Food Waste Hierarchy) could guide decisions by communities, businesses and policy-makers, and help everyone focus on tackling the root causes and reducing the incidence of food poverty and hunger.
- More focus on **good food and planning** across the board but particularly in terms of retail and food growing, with a commitment to look at the London Plan but also how planning is implemented and used to create and foster good food environments.
- **More focus on schools, particularly secondary schools** and how to tackle the targeting of school children with junk food, which currently undermines many of the healthy eating initiatives trying to improve the diets and health outcomes of young people.
- Clearer recognition of multiple benefits of food growing, **protection of existing community food growing spaces** and more on the huge potential for food production in London's Green Belt.
- **An explicit statement on the type of farming and food supply that London seeks to promote** i.e. agro-ecological/low environmental impact and diverse farming systems with shorter supply chains and fair terms of trade. Also with imported food meeting ethical and sustainability criteria and supporting food producers in developing countries, e.g. products accredited as Fairtrade.
- Clearer actions on **how the Mayor can improve the environment through food supply** and influencing diets, for example by improving the environmental impact of food served in institutions and sold via London's retail outlets, and increasing buyer and consumer awareness.

In general the strategy does contain specific actions and targets but it would be good to develop this further with some key targets within each chapter. We also think that the introduction would benefit from a clearer explanation of how this relates to other strategies, including:

- where food is referenced in other Mayoral Strategies
- how the London Food Strategy will build on and integrate with these by bringing these issue together in one place and adding further actions and targets.

We also strongly recommend the addition of a statement to the London Food Strategy making it clear and explicit that the London Food Board and the GLA London Food Strategy team are not responsible for planning for emergency food security and crisis management in London, for example, in response to a terrorist attack, flood or other major disruption to the city's food supply. We can advise and provide links, and will willingly participate, but do not have the resources, expertise or powers to plan for this type of crisis response. It is important to clarify this point to ensure that the right people within the GLA understand that crisis food provision remains in their own remit, alongside provision of water, medication, electrical power, transport and emergency health services in times of crisis.

Chapter-by-chapter comments

1. Good Food at Home

Sustain and London Food Link strongly support the overriding principle of this section, in that **“We should not accept foodbanks as a fact of life in London.”**

The wording and sentiment may need to be reinforced with an explanation that the London Food Strategy seeks to promote an approach that would secure healthy, sustainable and affordable food for everyone and contribute to the ambition of ‘Zero Hunger’ in the capital. Reducing the need for foodbanks should be one of our key indicators of success, but we would like to see that a more explicit reference is made to not seeing food surplus as the ‘solution’ to people who cannot afford to eat – these are both problems that need to be addressed in their own right and linking these as a ‘solution’ has potential to institutionalise both of the problems.

We commend the references to the raft of good policy and practical initiatives that are being delivered or need to be taken further, including London borough food poverty action plans, holiday food provision, the London Living Wage, rights of citizens and meals on wheels/good food for older and vulnerable people. We would also like to see how the Mayor could help boroughs implement the Food Poverty Action Plans and take a convening role in ensuring these deliver change.

We also welcome support for London Food Link’s Beyond the Food Bank report, which provides a profile of London Borough action to tackle the root causes of food poverty. We also commend the **inclusion of health-related dietary issues, such as promotion of more seasonal fruit and vegetables; less food high in fat, sugar and salt; and mention of reducing meat.**

While these commitments are very helpful areas in this chapter where there could be clearer commitment, action and targets as follows:

- Add reference to state that: ‘Older and vulnerable people living at home should have access to a healthy and affordable food through supported meal services’ We encourage the Mayor to **champion some such areas where change could be levered such as Meals and Wheels for vulnerable adults.**
- **Signalling clearly that some action must be taken at national level.** Examples include the need to reduce the impact of benefit sanctions and delays in payment of Universal Credit for people living on a low income, or the ‘poverty premium’ experienced by people in low incomes or in deprived areas. Another example is supporting better UK agriculture policy to ensure more local supply of fresh, healthy and sustainably grown fruit and vegetables.
- A very practical role for the Mayor would be to improve and collect data on relevant issues, and see the value in this data store for our work, as well as the work of partners.

It would also be helpful to make a cross-reference in this chapter 4, to make better sense of ‘Good Food at Home’ for those households with children. This would reference improving Health Start uptake.

2. Shopping and Eating Out

Sustain and London Food Link strongly **support the proposed ban on advertisements for junk food and sugary drinks** (HFSS – high fat, salt and sugar foods and drinks) across the Transport for London (TfL) network. It is this sort of bold leadership that London needs to take in order to help parents introduce children to healthier preference and eating habits. This builds on, and goes further than, existing precedents in other European cities, such as Amsterdam, where since 1 January 2018, no junk food ads likely to appeal to children or teenagers are allowed to appear anywhere on the municipal subway system.

We strongly support the proposal to ban individual HFSS product adverts across TfL's advertising inventory, but also to address the growing trend towards broader brand advertising by confectionery, snacking brand and unhealthy fast food outlets and include brand advertising in scope for the ban. Implementation will require criteria for a brand advertisement that is likely to have the same effect as an HFSS product ad. Sustain, and members of our Children's Food Campaign in particular, are well placed to support and contribute to any consultation or the development of such guidance.¹

This measure will also support the work of many of the organisations trying to help families eat well across the capital, as well as incentivising food and drink businesses – at local and national level – to improve the nutritional profile of their products. The story of the UK's sugary drinks tax has already proved that manufacturers will reformulate when they have the incentive to do so.

The draft London Food Strategy contains a **strong recognition of the work of good food enterprise** and we commend this joined up approach to tackling some of our big challenges. London Food Link have celebrated the Urban Food Heroes using food for good and would welcome a Mayoral initiative to support more food social enterprises and values-driven food businesses, to ensure that the retail and eating out sector can deliver multiple benefits across skills, training and provision of healthy, affordable food. We would welcome clearer commitments and actions by the Mayor to address the imbalance between nutrient poor outlets focused on HFSS and those selling affordable fruit and veg in particular a recognition of the Veg Cities campaign.

This could in part be driven by **the proposed Good Food Retail Plans**, developed locally to give Local Authorities the support to take a joined up approach in their neighbourhoods and across borough. As mentioned we would recommend this focused initially on access to fresh fruit and vegetables. New good food enterprises also need access to finance, premises, promotion, business support and advice which could be provided by Mayoral regeneration or crowdfunding initiatives; and planning decisions at a local level must favour diverse retail developments and support new community trading models.

Much work has been done in the area of planning for good food and London continues to innovate in this area. We feel that the strategy overall does not fully recognise the **importance of planning for creating good food for all**, and that this chapter is probably the best place to focus on it. While the London Plan covers the framework there is a need to highlight how the Mayor and the Food Team can continue to ensure that planning is translated and implemented locally, and that they continue to be innovation and learning in the realm of good food planning. This also could like to Health Impact Assessments and other tools available for new developments.

A note on Brexit

Of course, no document mentioning food businesses at this point in history could fail to mention the **potential impact of Brexit**. Food is the biggest employer in the UK – in the farming, processing, manufacturing, restaurant, distribution, and retail and hospitality sectors. All of these sectors are already struggling with recruitment and some of the biggest and also very significant sectors for London (e.g. horticulture, restaurants and hospitality) have projected a need for tens of thousands additional recruits in the near future. A very high proportion of such employees, across all food-related sectors, are from other countries, but have not yet featured in any preferential migration or visa arrangements coming from national government. This is probably due to the generally low pay and low status of jobs in food, especially in comparison to, for example, the health and finance sectors. Yet even doctor and bankers must eat!

We are likely to face a more constrained migration policy. The question of who will pick our crops, drive our delivery vehicles, cook our hospital meals or serve our sandwiches remains unanswered. The Mayor and London Food Strategy could make more explicit reference to the likely or possible challenges ahead and the possible impact on London's diverse food businesses.

Whilst no-one is in a position to make firm predictions at this time, it seems possible that currency fluctuations and changes to border arrangements are very likely to impact on food prices, at least in the short- to medium-term following EU Exit in March 2019. In turn, this may have a disproportionate impact on people living on a low income, tens of thousands of whom in London are already struggling to eat well.

It may be that London and the UK will benefit from lower food prices in the longer-term, however it seems unlikely that new trade deals that might deliver this will be agreed any time soon. We believe it is therefore prudent for London's decision-makers to assume that periods of major change may be associated with disruption to people's food supply, and to plan accordingly.

While the leading action in this chapter is sending a strong signal we think that there should be some additions as follows:

- Support for Veg Power and Veg Cities campaigns, with specific references to how Good Food Retail plans can support this.
- A clearer focus on Good Food Planning – highlighting the importance of the planning system on the retail economy and access to good food and committing to using GLA resources to ensure that planning is used as a tool to implement the visions contained within the strategy.
- Cross referencing the need to promote the London Living Wage with all type of business.

3. Good Food in Public Institutions & Community Settings

Sustain and London Food Link are delighted to see **strong support for drinking water fountains**, which provides a relatively simple effective joined up action that improves public health through improved hydration and displacement of sugary drinks; whilst also tackling environmental challenges of bottled water and other drinks. We have recommended that the Mayor take this leadership further by creating more ambitious targets for 2020 and also ensuring that the initiative works to increase public access in public settings, rather than private settings.

We also **commend the leadership to “promote healthy, sustainable food in the GLA Group through the food it sells in staff restaurants”** as this is a very important role. We feel that this should explicitly support verifiably sustainable fish (using the Sustainable Fish Cities definition, as set out in the London Food Strategy) and also extend to explicit support for SUGAR SMART, which is referenced elsewhere in the strategy for other organisations to support.

This chapter strongly reinforces the work of London Food Link to produce the **annual Good Food for London report** and league table on local authority performance on key food-related policies and practices. This is helpful but explicit support for this would be welcomed.

We would recommend that the Mayor support and builds on the work of other organisations, including:

- Supporting new models to deliver good food for older residents in community settings (as well as at home)
- Support UNICEF Baby Friendly accreditation, which is mentioned later in Chapter 4.
- Make strong commitments to SUGAR SMART, Sustainable Fish and a future target for drinking water fountains

4. Good Food for Maternity, Early Years, Education and Health

Sustain and London Food Link welcome the proposal to implement the policies set out in the draft strategy, including the **restriction on hot food takeaways near schools**. This also needs to go hand-in-hand with the work mentioned in Chapter 2 on improving the reach of the Healthy Catering Commitment to tackle the food offer near or on school routes.

Other welcome initiatives in this section are the **Obesity Taskforce, support for Healthy Start Voucher update and UNICEF Baby Friendly accreditation**, many of which we measure across London through the Good Food for London report, supported by the Mayor of London. We also would encourage the Mayor to improve the awareness of Healthy Start Vouchers and use his influence and opportunities to promote to improve take up and signposting.

While the focus on early years is strong, there is a **lack of reference to schools and particularly secondary schools**. We feel this does not reflect the evident commitment by the GLA, Healthy Schools London, Food for Life Partnership and health inequalities practitioners, who have a clear focus on working with schools to improve children’s knowledge, skills and opportunities around healthy and sustainable food.

We feel that this section should:

- focus more on schools in this setting including referencing to the food growing in schools agenda that is mentioned in the next chapter, as the focus here is the setting.
- Commit to embedding food and food growing more strongly into the Healthy Schools Framework.
- show leadership by supporting emerging work on secondary schools.
- cross-reference support for holiday food provision and breakfast clubs in this section.

It would also be useful to make reference in this section to hospital food. This is not within the Mayor’s powers to improve directly, so requires action at national and institutional level. Many local food partnerships are working to improve hospital food as part of Sustainable food Cities; there are also moves a foot led by NHS Improvement to set mandatory hospital food standards nationally. It would be

very helpful for the London Food Strategy to express support for such work – Sustain can advise on wording and contacts.

5. Food Growing....

Sustain and London Food Link fully support the ethos behind this chapter – in that **“the importance of food growing in ... cannot be overstated”**.

This chapter also reinforces the commitments in the New London Plan (the overarching spatial planning framework for London) to encourage new land for community food growing, particularly in housing developments, as well as the recognition of the role of urban farming with important name-checks for some of the pioneers in London.

We welcome the **link to skills and jobs**, with a suggestion of the use of the Good Growth Fund which could help provide the necessary infrastructure. Ideally it would be good to develop detail on how this could link with other skills agendas and funding within the Mayor’s remit.

London has a strong legacy of supporting food growing in many forms and in order to continue to champion and deliver on the importance this chapter should

- place stronger **emphasis to the protection of existing food growing**, as well as recognition of how this is promoting biodiversity and contributing to London’s green infrastructure and wildlife corridors (linked back to the Environment Strategy).
- Commit to increase food production in the Green Belt and identify how this can be supported
- recognise the type of growing and farming that the strategy seeks to support, which integrates this chapter with other themes. In particular the strategy should support agro-ecological fruit, vegetable and salad (horticultural) production at all scales – domestic, community, social enterprise and commercial – for the multiple environmental and health benefits this would provide.
- Link to procurement of food grown in London as part of a wider theme on procurement of agro-ecological foods (Chapter 6).

In light of these comments, the reference to aquaponics and vertical farming does not feel relevant and should be removed or at least made in the context of other forms of growing that are more beneficial to the environment, skills and communities. This is a challenging premise as these methods of farming, while innovative are not necessarily the main source of food, especially for low-income consumers – due to set-up, staff and hygiene costs, they tend to be suited to high-value crops such as salad leaves. Neither of these methods can be ‘organically certified’ and require high capital inputs to get started. While they could have their place and attract interest and investment, it does not seem appropriate to highlight these above other forms of growing such as organic, permaculture which have more robust evidence and currently offer more opportunity for community engagement and employment. It may be helpful to reference ‘innovation’ in a more general way, which covers a wide range of possible approaches, including tech solutions for helping people grow and trade more local food.

6. Environment

This chapter in the draft London Food Strategy has a clear focus on waste and sets some clear goals. We would welcome a commitment to a stretch target to promote UN Sustainable Development Goal 12.3, which aims to reduce food waste by 50% by 2030.

The chapter also makes reference to 'food security'. This is an issue with a very large scope and the London Food Strategy should make clear the role and limitations of the GLA Food Team and London Food Board. As noted in 'key principles' at the start of this response, we strongly recommend that the London Food Strategy explicitly states that it does not deal with planning for food provision in times of crisis (flood, terrorist attack, etc.). We feel that the London Food Strategy's role is to build longer term food resilience for Londoners and for the city, supplied by healthy and sustainable food that actively enhances and does not damage the natural systems that feed us. Hence, the food team could contribute to national debates on the way the country and city provision ourselves with healthy and sustainably grown food, and also address the way that shorter and diverse supply chains could promote resilience, as well as how diverse retail outlets and supply chains can improve food security.

Waste is important but we feel that there is a need to cover much more in this important chapter, particularly as food was not covered in the Environment Strategy in any significant way. In particular this chapter should include actions that address the bigger environmental issues connected to our food consumption and the food systems that feed us. We suggestion referencing the importance of where food comes from and what we eat in this section to reinforce Chapter 1 and go further on how sustainable diets support healthier lifestyles as well as lowering greenhouse gas emissions.

Currently there is no mention of soil in this chapters, which is a fundamental of environmental protection, farming futures and food security. There is also no mention of biodiversity, pollinators, pesticide use and or supporting farm systems that promote this, such as organic, agro-ecological, pasture-fed meat and mixed farming

This section should:

- Commit to challenging the greenhouse gas emissions associated with our food systems, by looking to support short supply chains, agro-ecological farming and improving the diet of Londoners to include more seasonal, field-grown and UK grown veg.
- highlight agro-ecological and organic food, and more plant-based options, and how these can feature in local authority, school and hospital catering, including by achieving a Silver or Gold 'Food for Life Served Here' Catering Mark, uptake of which in turn can be measured in the Good Food for London maps and league table.
- state how The GLA Group procurement team champion the environment benefits associated with food systems by specifying more healthy food with a higher proportional of plant-based ingredients; less use of livestock products overall; food from agro-ecological production; and substantial reduction of food waste, with unavoidable food surplus or waste diverted to useful purposes in line with the Food Waste Hierarchy (which is already adopted as policy by the GLA Group).

We recommend the following commitments:

- State the London Food Strategy's support for no fracking in the Greater London area, as this releases greenhouse gases and contaminates water resources vital for food growing.
- Commit to a Pesticide Free London campaign, for the health of people and pollinators.
- Adopt concrete policies on single-use packaging reduction and a total ban on polystyrene, following the lead of many cities internationally.

Contact details

This submission has been prepared in consultation with expert staff at Sustain: The alliance for better food and farming and our London Food Link network, specialising in the wide range of issues covered by the draft London Food Strategy and well connected to the communities and networks who will play a

part in making the London Food Strategy a success. We have also shared this document, and encouraged comments either on this, or directly to the GLA Food Team on the strategy consultation, with members and supporters of the London Food Link network.

This response has been coordinated by Sarah Williams and Kath Dalmeny, who sit jointly as members of the London Food Board:

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