

London Food Link, Sustain: Summary response to 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.

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.

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 – see below:

- 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 (See below for full details):

- There is already strong support for London Living Wage but we would like this to be extended for businesses, contractors and boroughs.
- 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.
- More focus on good food and planning across the board but particularly in terms of retail and food growing.
- More focus on schools, particularly secondary schools and how to tackle the targeting of school children with junk food.
- 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.
- Clearer actions on how the Mayor can improve the environment through food supply and influencing diets.

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 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.
- **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
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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,.
- **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 to reduce the availability and promotion of sugary foods and drinks in their area.
- **Growing Health**, working to see how community food growing can promote 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**
- **Right to Food campaign**
- **Agriculture policy work**
- **Campaign for Better Hospital Food,**
- **Children's Food Campaign and Parents Jury,**
- **Food Co-ops**
- **Campaign for a Better Food Britain**

(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.

(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.”**
- ✓ We commend the references to 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 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:

- 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.
- 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.

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.
- ✓ 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.
- ✓ The draft London Food Strategy contains a **strong recognition of the work of good food enterprise** and we welcome **the proposed Good Food Retail Plans.** We would recommend this focused initially on access to fresh fruit and vegetables..

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

- ✓ We are delighted to see **strong support for drinking water fountains**. We have recommended a 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 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**.

Other welcome initiatives in this section are the **Obesity Taskforce, support for Healthy Start Voucher update and UNICEF Baby Friendly accreditation**.

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.

5. Food Growing, Community Gardens and Urban Farming

- ✓ 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.
- ✓ 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.

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, e.g. agro-ecological fruit, vegetable and salad (horticultural) production at all scales – for the multiple environmental and health benefits this would provide.

6. Environment

- ✓ This chapter in the draft London Food Strategy has a clear focus on waste and sets some clear goals.
- ✓ 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.

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.

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