

**Written Evidence submitted by Sustain: The Alliance for Better Food and Farming to the Environmental Audit Committee inquiry on Sustainable Development Goals in the UK.**

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.

**What steps the Government has taken to achieve the Goals?**

The *Measuring Up*<sup>1</sup> report produced by the UK Sustainable Development Goal network rated the UK Government's progress towards achieving the Sustainable Development Goals (SDGs). None of the goal targets part of SDG 2 received a positive rating. In our submission we shall focus on goal 2.1, 2.2, 2.3, and 2.4.

Goal 2.1 on ending hunger and ensuring secure food access received an amber rating. The U.K has some of the worst rates of household food insecurity in all of Europe.<sup>2</sup> Whilst it is difficult to provide accurate figures as the U.K does not measure household food insecurity on a national scale, figures from the UN suggest that approximately 8.4 million people are suffering from food insecurity in the U.K.<sup>3</sup> Reports from civil society have shown that a number of recent policy changes have in fact worsened the situation, for example a cumulative impact assessment of recent tax and welfare reforms conducted by the Equalities and Human Rights Commission found that those on lower incomes were now worse off<sup>4</sup> and recent research by Child Poverty Action Group found that families who received welfare payments now only had 40% of the budget required for a socially accepted minimum standard of living<sup>5</sup>. Welfare payments and wages need to be tied to actual living costs so as to ensure that the target of Goal 2.1 is achieved.

Goal 2.2 on preventing malnutrition received a red rating. In the U.K context, goal 2.2 needs to be understood as including food insecurity and obesity under the malnutrition heading. The U.K is currently struggling to address malnutrition including obesity and food insecurity. Both child and adult obesity rates are high, whilst childhood obesity has stabilised it is not

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<sup>1</sup> UKSSD (2018) Zero hunger End hunger, achieve food security and improved nutrition and promote sustainable agriculture <https://www.ukssd.co.uk/Handlers/Download.ashx?IDMF=5fdd4541-c3bc-4d25-b7b9-2268d1c30cda>

<sup>2</sup> Taylor, A. and Loopstra, R. (2016) Too poor to eat – food insecurity in the UK.

<sup>3</sup> Food Foundation (2016) Too Poor to Eat: 8.4 million struggling to afford to eat in the UK <https://foodfoundation.org.uk/too-poor-to-eat-8-4-million-struggling-to-afford-to-eat-in-the-uk/>

<sup>4</sup> Equality Human Rights Commission (2018) The cumulative impact of tax and welfare reforms <https://www.equalityhumanrights.com/en/publication-download/cumulative-impact-tax-and-welfare-reforms>

<sup>5</sup> Child Poverty Action Group (2018) Cost of a Child in 2018 <http://www.cpag.org.uk/content/cost-child-2018>

declining.<sup>6</sup> In the U.K calories from healthy foods consistently cost more than those that are obtained from less healthy food. Households on low incomes are therefore highly reliant on calories from less healthy foods due to budgetary restraints.<sup>7</sup> Due to this, obesity and food insecurity are often co-located.<sup>8</sup> New measures announced by Government as part of the second chapter of its Childhood Obesity Strategy include the ambitious target of halving childhood obesity by 2030, restrictions on unhealthy food marketing and promotions, and measures to reduce sugar consumption. If these measures are fully implemented then they would go some way towards tackling malnutrition in the U.K.<sup>9</sup>

Goal 2.3 of doubling the production of small scale food producers, and improving access to land for marginalised communities received an amber rating. The farming sector in the U.K is extremely reliant on both large scale farming and food imports.

For fishing, the UK government has undermined opportunities for the small scale sector by allocating the bulk of the rights to fish (quota) to very large industrial boats. In 2016 for example, three companies controlled 61% of the quota for England and Wales.<sup>10</sup>

There is an excellent opportunity to change this. In the coming months Defra will publish a new Fisheries Bill, outlining how fisheries will be managed after Brexit. This Bill should contain proposals for a new system of quota allocation, prioritising sustainable fishing and allowing the small scale fleet a greater share.

Goal 2.4 on ensuring sustainable food systems received an amber rating.

### **How this is reflected in Single Department Plans and departmental reporting**

In their response to the Committees Ninth Report on the Session 2016-17<sup>11</sup>, the UK Government reaffirmed the need for the goals to be incorporated into Single Departmental Plans, with these plans clearly outlining how each department's planned activities will support the delivery of the goals.

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<sup>6</sup> UKSSD (2018) Zero hunger End hunger, achieve food security and improved nutrition and promote sustainable agriculture <https://www.ukssd.co.uk/Handlers/Download.ashx?IDMF=5fdd4541-c3bc-4d25-b7b9-2268d1c30cda>

<sup>7</sup> Food Foundation (2018) Affordability of the Eatwell Guide [https://foodfoundation.org.uk/wp-content/uploads/2018/09/Affordability-of-the-Eatwell-Guide\\_Final\\_EMBARGOED-Version.pdf](https://foodfoundation.org.uk/wp-content/uploads/2018/09/Affordability-of-the-Eatwell-Guide_Final_EMBARGOED-Version.pdf)

<sup>8</sup> Monsivais, Pablo. (2016). Hungry and obese: The challenge of household food insecurity.

<sup>9</sup> HM Government (2018) Childhood obesity: a plan for action, chapter 2

<https://www.gov.uk/government/publications/childhood-obesity-a-plan-for-action-chapter-2>

<sup>10</sup> Green Peace (2016) Big fish quota barons squeeze out small scale fishermen

<https://unearthed.greenpeace.org/2016/05/15/investigation-big-fish-quota-barons-squeeze-out-small-scale-fishermen/>

<sup>11</sup> House of Commons Environmental Audit Committee (2017) Sustainable Development Goals in the UK: Government Response to the Committee's Ninth Report of Session 2016-17

<https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/616/616.pdf>

However no department currently measures household food insecurity on a national scale meaning it is very difficult to monitor any progress made towards the targets set by SDG2.

Furthermore, placing policy oversight for the SDGs with the Secretary of State for International Development has meant that there has been a strong international focus rather than a recognition that the SDG2 target of ending hunger is both an international and a domestic goal.

### **What preparations are underway for the Voluntary National Review process, and how will the outcomes and impacts be measured**

The lack of official data on household food insecurity makes it difficult for Government to report on their progress towards the SDG targets around food security, especially targets 2.1 and 2.2.

We hope that the Government commits to measuring household food insecurity on a national scale and could do so by supporting Emma Lewell Buck MP's Bill on Household Food Insecurity.

### **Whether the Government can be said to have an action plan on the SDGs?**

To the best of our knowledge, we are not aware of any cross-governmental action plan on achieving the UN Sustainable Development Goals.

### **How does the Government take its commitment under the SDGs to address food insecurity and malnutrition in all its forms into account when developing policy on food; is there the data to effectively measure progress against these commitments?**

We are concerned that the Government is not taking into account its commitments under the SDG's when developing policy on food. We are also concerned that the Government is not taking into account its commitments under the SDG's when developing policy in other sectors that will then have an impact on SDG 2.

#### Income and welfare payments

Currently the U.K has some of the highest levels of food insecurity in all of Europe for both adults and children.<sup>12</sup> The current high levels of food insecurity are at odds with the fact that the U.K. has a relatively secure food system overall, with a consistently stable food supply and relatively stable food prices.

There is a great deal of evidence that suggests that recent tax and welfare changes have contributed to a worsening of household food security in the U.K. The National Audit Office

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<sup>12</sup> UKSSD (2018) Zero hunger End hunger, achieve food security and improved nutrition and promote sustainable agriculture <https://www.ukssd.co.uk/Handlers/Download.ashx?IDMF=5fdd4541-c3bc-4d25-b7b9-2268d1c30cda>

concluded in its report on the roll-out of Universal Credit that many people suffered difficulties and hardship because of the way that Universal Credit works.<sup>13</sup> Research conducted with emergency food aid providers by the End Hunger UK Coalition, of which Sustain is a member, found that in areas where Universal Credit was rolled out there was a surge in demand for emergency food aid.<sup>14</sup>

Income levels and welfare payments are at such a level that many families currently struggle to afford the food that would enable them to have a nutritious diet. Recent research by Sustain alliance member the Food Foundation found that in order to follow the U.K Governments Eat Well Guide households in the bottom two deciles would have to spend 42% of their after housing income.<sup>15</sup>

Abundant fish stocks are vital for the health of the UK population. Fish is recommended in a healthy diet as part of the Eatwell Plate, Seafish recommend that two portions should be eaten per week, and fish is required to be served once per week in schools and hospitals. There is a growing body of evidence of the benefit of omega 3 oils found in oily fish for the brain and heart<sup>16</sup> and improving survival for certain types of cancer.<sup>17</sup>

Over the last two decades, fish has increased in price as stocks have steadily declined. Since 2007 fish has increased in price by 31%, faster than other meat and nearly twice as fast as cheese and dairy<sup>18</sup>. This price increase is affecting poorer households most, with an 18% drop in fish-buying in the poorest households between 2007 and 2015. There is a risk that, if we don't restore fish stocks and the marine environment, fish will continue to become scarcer, and could become the luxurious preserve of the wealthy. This could have profound societal impacts on health.

To ensure that fish is an affordable part of our menus in years to come it is vital that stocks are allowed to recover, and the ecosystem which supports them is protected.

### Gender Equality

There are currently an estimated 700,000 more women than men who are suffering from poverty in the U.K.<sup>19</sup> Women have been disproportionately impacted by recent tax and

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<sup>13</sup> National Audit Office (2018) Rolling out Universal Credit <https://www.nao.org.uk/report/rolling-out-universal-credit/>

<sup>14</sup> End Hunger UK (2018) Fix Universal Credit <http://endhungeruk.org/wp-content/uploads/2018/07/Fix-Universal-Credit-a-report-from-End-Hunger-UK.pdf>

<sup>15</sup> Food Foundation (2018) Affordability of the UK's Eatwell Guide [https://foodfoundation.org.uk/wp-content/uploads/2018/09/Affordability-of-the-Eatwell-Guide\\_Final\\_EMBARGOED-Version.pdf](https://foodfoundation.org.uk/wp-content/uploads/2018/09/Affordability-of-the-Eatwell-Guide_Final_EMBARGOED-Version.pdf)

<sup>16</sup> British Heart Foundation (2018) High Cholesterol <https://www.bhf.org.uk/informationsupport/risk-factors/high-cholesterol>

<sup>17</sup> NHS (2016) **Eating oily fish 'may boost bowel cancer survival'**  
<https://www.nhs.uk/news/cancer/eating-oily-fish-may-boost-bowel-cancer-survival/>

<sup>18</sup> <https://www.gov.uk/government/publications/food-statistics-pocketbook-2017/food-statistics-in-your-pocket-2017-prices-and-expenditure#uk-retail-price-changes-by-food-group-2007-to-2016>

<sup>19</sup> Joseph Rowntree Charitable Trust (2018) #IWD2018: time to loosen the grip of poverty on women in the UK <https://www.jrf.org.uk/blog/iwd2018-time-loosen-grip-poverty-women-uk>

welfare changes, losing on average just under 400 per year compared to a nearly £30 loss by men.<sup>20</sup>

Single parents, of which an estimated 90% are women, were some of those that faced the toughest gap between their income and their required budget in order to achieve adequate living standards<sup>21</sup>. Half of young mums surveyed by the Young Women's Trust said that they had skipped meals to ensure their children were fed, and a quarter reported using food banks.<sup>22</sup>

There are a number of initiatives targeted at women that aim to reduce food insecurity and malnutrition in this group and we welcome these. For example Healthy Start scheme provides vouchers to pregnant women and young children in low income families.<sup>23</sup> The different types of vouchers can either be swapped for health food or for vitamin supplements. This scheme is means tested and helps to ensure basic nutrition for vulnerable mothers and their young children. We hope that in the future the Government will take into account women's needs when developing policy and legislation so as to ensure that women are not disproportionately impacted.

#### Childhood malnutrition and hunger

The Equalities and Human Rights Commission (EHRC) cumulative impact assessment found that recent welfare and tax changes are predicted to push one and a half million more children below the poverty line.<sup>24</sup>

School meals are a key tool that can be used by government to tackle childhood food poverty and improve their nutrition. Unfortunately, approximately one million children in the UK are set to miss out on their entitlement due to a recently introduced earnings threshold for eligibility under Universal Credit that restricts eligibility to families with net earnings below £7,400.<sup>25</sup> This new net earnings threshold means that families on very low incomes will have to find the resources to cover the additional cost of a lunchtime meal at a time when welfare payments are frozen, wages are stagnating, and living costs are rising.

The Families and Food in Hard Times project has been conducting research with children and their families in Portugal, the UK and Norway. In the UK, it found that many children are

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<sup>20</sup> Equality Human Rights Commission (2018) The cumulative impact of tax and welfare reforms <https://www.equalityhumanrights.com/en/publication-download/cumulative-impact-tax-and-welfare-reforms>

<sup>21</sup> Equality Human Rights Commission (2018) The cumulative impact of tax and welfare reforms <https://www.equalityhumanrights.com/en/publication-download/cumulative-impact-tax-and-welfare-reforms>

<sup>22</sup> Young Women's Trust (2017) What Matters to Young Mums [https://www.youngwomenstrust.org/assets/0000/6339/Young\\_Mums\\_report\\_version\\_2.pdf](https://www.youngwomenstrust.org/assets/0000/6339/Young_Mums_report_version_2.pdf)

<sup>23</sup> Sustain (2018) Improving the uptake of Healthy Start Vouchers [https://sustainweb.org/foodpoverty/healthy\\_start/](https://sustainweb.org/foodpoverty/healthy_start/)

<sup>24</sup> Equality Human Rights Commission (2018) The cumulative impact of tax and welfare reforms <https://www.equalityhumanrights.com/en/publication-download/cumulative-impact-tax-and-welfare-reforms>

<sup>25</sup> Children's Society (2018) Free school meals and Universal Credit: Briefing on Government's proposed changes to eligibility criteria for free school meals <https://www.childrensociety.org.uk/sites/default/files/free-school-meals-universal-credit-briefing-15-jan-2018-final.pdf>

already unable to receive free school meals due to their parents' immigration status or other eligibility requirements, despite being in need.<sup>26</sup>

Free School Meals, if a child is eligible, can go some of the way to help children in food insecurity access nutritious food, unfortunately there is a lack of coordinated response to food access during the school holidays. Research has shown that many families are forced to cut back on either the quantity or the quality of food during the holidays due to the added cost of, for example, childcare, going down to part-time work and meal times.

Some schools and communities have responded to the demand by setting up Holiday Clubs where they provide a combination of meals and activities to children in need and sometimes their parents as well. Earlier this year *School Holidays (Meals and Activities) Bill (HC Bill 101)* was put before the UK parliament with the aim of providing a framework for provision of food and activities during the holidays in England and Wales. The government decided not to support this Bill, as it is their view that primary legislation is not their chosen method of resolving the issue of holiday hunger. Instead, they offered funding for some pilots.<sup>27</sup>

Many experts and children's advocates, including the Children's Food Campaign coordinated by the Sustain alliance, recommend that free school meals be provided to all children so as to reduce the stigma that can be associated with them and to ensure that all children receive at least one nutritious meal every day. This can also make school meal provision more cost-effective and reduce the administrative burden. In our view, this provision of meals should also be extended to breakfast clubs, as well as meals and activities during the holidays, to ensure children are able to have access to good food 365 days a year, in a dignified manner.

### Measurement

In its response to the Committees Ninth Report on the Session 2016-17, the UK Government stated that "High quality official statistics will play a key role in monitoring progress towards the Goals."<sup>28</sup> This is at odds with the lack of national annual measurement of household food insecurity meaning that Government is unable to respond accurately to a number of target goals of SDG2.

At present, in order to respond to the targets on Food Security for SDG2, the Office for National Statistics (ONS) is currently using the Food and Agricultural Organization (FAO) United Nations Gallup World Poll. The ONS however recognises that there are a number of shortcomings in using this data, namely that the UK sample size is small.

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<sup>26</sup> Rebecca O'Connell, Julie Brannen, and Abigail Knight (2018) Holiday hunger requires radical long term solutions <https://blogs.bmj.com/bmj/2018/08/15/holiday-hunger-requires-radical-long-term-solutions/>

<sup>27</sup> Sustain (2018) Government has pledged to launch targeted pilots to address holiday hunger [https://www.sustainweb.org/news/jan18\\_government\\_pledges\\_holiday\\_hunger\\_pilots/](https://www.sustainweb.org/news/jan18_government_pledges_holiday_hunger_pilots/)

<sup>28</sup> House of Commons Environmental Audit Committee (2017) Sustainable Development Goals in the UK: Government Response to the Committee's Ninth Report of Session 2016-17 <https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/616/616.pdf>

The devolved nations have made some progress in household food insecurity measurement, unfortunately Wales, Scotland, and Northern Ireland use different measurement tools, making it difficult to use the data for comparative analyses.<sup>29</sup> In October 2018, Emma Lewell-Buck MP's Food Insecurity Bill will have its second reading in Parliament. This Bill would make it a requirement on Government to measure household food insecurity annually across all of the UK and to then use this data to publish annual reports.<sup>30</sup>

There have been a number of commendable efforts from civil society to quantify the number of people suffering from food insecurity in the U.K, these include:

- Work by academics such as Dr Dianna Smith (University of Southampton) and Dr Claire Thompson (London School of Hygiene of Tropical Medicine) who are developing a mapping system to monitor the extent of food insecurity at a local level based on a number of factors and using data from sources such as the NHS.
- Third-sector assessments, such as the Beyond the Food Bank Report<sup>31</sup> – an annual league table produced by Sustain that looks at the steps that London Councils are taking to reduce food poverty and score them accordingly; also assessment by the Food Foundation of the number of children living in UK households struggling to afford healthy food.
- Work by emergency food aid providers to count the number of parcels they distribute.

However we would like to make clear that whilst these efforts have a great deal of value, but none of them can replace national household food insecurity measurement, rather they can only help shed some light on its local characteristics and on steps that are taken to respond to food insecurity.

## Brexit

Some of these upcoming challenges facing the U.K food sector will be brought about by the U.K leaving the European Union.

- A number of the SDG2 targets that relate to biodiversity and agriculture are currently incorporated into U.K policy and legislation through the EU. We hope that the U.K will continue to work towards achieving the goals as set out by SDG2.
- A recent report by the Food Research Collaboration,<sup>32</sup> with whom Sustain works closely, expressed fears that the UK government was planning to suspend food regulations in the case of a no deal Brexit. The researchers expressed dismay that consumers could not have faith in their food security but also said this opened the way for food fraud in the UK.

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<sup>29</sup> Sustain, University of Oxford, Food Foundation (2016) Measuring household food insecurity in the UK and why we MUST do it

<https://www.sustainweb.org/resources/files/reports/MeasuringHouseholdFoodInsecurityintheUK.pdf>

<sup>30</sup> <https://services.parliament.uk/bills/2017-19/foodinsecurity.html>

<sup>31</sup> Sustain (2017) Beyond the Food Bank London Food Poverty Profile 2017

[https://www.sustainweb.org/publications/beyond\\_the\\_food\\_bank\\_2017/](https://www.sustainweb.org/publications/beyond_the_food_bank_2017/)

<sup>32</sup> Food Research Collaboration (2018) Feeding Britain: Food Security after Brexit

<http://foodresearch.org.uk/publications/feeding-britain-food-security-after-brexit/>

- In the same report, The Food Research Collaboration has also flagged that low income consumers have been affected by rising food prices since the pound dropped in value post-Brexit referendum.
- The Food Foundation, who are Sustain members, released a report saying the consumption rates for healthy foods could tumble after Britain leaves the EU because of the “triple impact” of exchange rates, labour costs and tariffs which could increase the amount a family of four spends on fruit and vegetables by up to £158 annually.<sup>33</sup>
- Sustain is concerned that future trade food deals could have an impact on the quality of our food. In particular, a trade deal with the U.S.A could undermine UK efforts to reduce sugar consumption and import American levels of diet-related diseases alongside their produce. Processed foods, sugar and high fructose corn syrup (another form of sugar) are all high on the list of edible goods exported by the US and expected to feature in any future UK/US trade deal.<sup>34</sup> We have found figures that show obesity rates in the US of over 20% versus 12% in the UK. This would work against the UK Government’s plans to reduce obesity.
- Certain sectors of the agricultural industry are heavily reliant on migrant workers coming from other parts of the EU. There has already been a drop in the number of workers coming to work in the sector, and we are concerned that if this trend continues then it might force up food prices due to lack of food on the market.
- The UK Government recently published its Agriculture Bill, laying out proposals for new powers to manage the UK agriculture system. Sustain welcomed much in the Bill but expressed concerns that it could lead to a fall in food production as there is no requirement for farmers to actually farm while we leave the EU.<sup>35</sup> We were also disappointed that there was no link drawn between agriculture and the opportunity to tackle public health challenges – eg the overuse of antibiotics in farming or boosting availability of healthy fruit and vegetables.
- We are concerned that the UK and EU may fail to reach agreement on how shared waters will be managed after Brexit; the EU has stated already that any deal with the UK would be contingent on continuing “existing reciprocal access to fishing waters and resources”,<sup>36</sup> whilst the UK has promised to take back it’s fishing rights. We are concerned that countries revert to living by their own rules, even though collective agreement is so important for shared stocks. In addition, the policies proposed for fishing after Brexit in the UK so far are much too weak to ensure a sustainable future for our marine resources and in some cases appear to be a step backwards for sustainability. This could jeopardise the security of our future supplies of fish.

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<sup>33</sup> Food Foundation (2018) Farming for five a day <http://foodfoundation.org.uk/wp-content/uploads/2017/11/Farming-for-five-a-day-final.pdf>

<sup>34</sup> U.S Department of Agriculture (2016) Infographic: U.S. Agricultural Exports, FY 2016 <https://www.fas.usda.gov/data/infographic-us-agricultural-exports-fy-2016>

<sup>35</sup> Sustain (2018) Sustain comments on Agriculture Bill details –update [https://www.sustainweb.org/news/sep18\\_agriculturebill\\_first\\_reactions/](https://www.sustainweb.org/news/sep18_agriculturebill_first_reactions/)

<sup>36</sup> Greenpeace (2018) Why the Government’s fisheries white paper could mean a bad deal for local, low impact fishing. <https://www.greenpeace.org.uk/governments-fisheries-white-paper-mean-bad-deal-local-low-impact-fishing/>