

Sustain response to the Labour consultation on a sustainable food policy

About Sustain: the alliance for Better Food and Farming

Sustain advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. We work with our members and others to promote integrated healthy and sustainable policies and practices for food, farming and fishing. Sustain coordinates a number of projects across the UK, which have informed our position within this response, including:

- **Sustainable Food Cities:** works with 60+ local areas across the UK to help create a more sustainable local food environment. Our Planning Food Cities, Sustainable Fish Cities, SUGAR SMART and Food Power programmes also work with many of these local areas to provide complementary support to strengthen food planning, improve access to sustainable, healthier and affordable food over less healthy alternatives.
- **Children's Food Campaign:** focuses on the rules and standards that hold business to account for the quality of the food sold, served and marketed to families and children, and notably helped push for a sugary drinks tax, for junk free checkouts in supermarkets, for improving the standard of food being served in schools, and for food education being put back on the curriculum and the introduction (and continuation) of universal infant free school meals, as well as setting up a Parents' Jury for the UK.
- **Farming Campaign:** to promote decent jobs and livelihoods, protection of environment, nature and animals and fair dealing for consumers and currently focusses on amendments to the Agriculture bill and farm and trade policy after Brexit.
- **Food Poverty:** working to alleviate food poverty by calling on Governments across the four nations to tackle the root causes such as low pay, as well as to improve and protect publicly-funded nutrition programmes. We run the Food Power network to support local food poverty alliances across the UK.
- **Sustainable Fish Cities:** A campaign to encourage and support fish-serving businesses in the UK to adopt and promote a sustainable fish buying policy. So far, business serving nearly one billion meals per year have pledged to serve only fish which is considered verifiably sustainable; either certified to a recognised sustainability standard, or rated 1-3 by the Marine Conservation Society.

Summary

Sustain welcomes Labour's decision to adopt a sustainable food policy and welcomes the ambition of the vision that it offers. The details below provide suggestions for improving the wording, and recommendations on how these principles can be put into practice. We hope that this policy, when adopted will strengthen the Labour party's resolve to be on the front foot in advocating these policies publically, shifting the public mood and creating the space to encourage the current Government to go further. Equally this should inform the Labour party's responses to current Government policy and legislation – particularly the recently launched consultation on a National Food Strategy - and moreover inform Labour election manifestos and future policy should it come to power.

Food Sovereignty

1. Are these the right principles on which to build our food policies?

We welcome the recognition of food sovereignty at the heart of the proposed policy. In adopting this definition, there are a couple of points that may warrant clarified wording so that this concept can be put into practice.

We suggest that *Food is for people* be reworded to *Enough healthy and culturally appropriate food is available for all people*. The wording on healthy and culturally appropriate food is part of the definition of food sovereignty which is lost by just including the six pillars/principles in the policy. Moreover these concepts and that of all people having enough food tie in with other elements of the proposed Labour policy.

We are suggesting an addition to the second principle: *Food producers are valued and everyone in the food and farming sector have decent livelihoods*. This ties in with other elements of the proposed Labour policy, and we think makes an important point about value and earnings applying to workers across the whole of the sector, which is otherwise absent from the set of principles that are clearly the grounding for the proposed Labour policy.

2. Are there other core principles we should adopt?

Climate Change mitigation and adaptation could easily go missing within the current wording, both within these core principles and also within the subsequent text. It needs to be much more prevalent within the proposals as action on climate will affect what we produce and how we produce it, and what we buy and eat.

Food marketing, retail and catering as well as food culture are currently absent from the Labour policy and we argue that all warrant inclusion – either as a core principle, or more usefully as part of the subsequent detail.

Restricting the marketing, promotion and sale of unhealthy and unsustainable food, particularly targeting children, would recognise Labour's long term support for stronger regulation in this area. This is further detailed under question 5.

On retail and catering, beyond our proposals in question 12 below, we recommend that further restrictions on sale of HFSS produce to children under 16 needs to be put in place, beyond the proposed ban on energy drinks. These should apply to any sales including those from hot food takeaways and delivery services, with other retail and catering outlets considered for inclusion. Other options have been tried such as restricting new takeaways from opening, but this both restricts businesses as well as missing the point that many local areas already have an overabundance of outlets selling HFSS produce, and still diet related ill health in children, let alone other age groups, remains undented. We also advocate a fair dealing approach both in terms of adhering to legally binding codes in the whole food chain so suppliers are treated fairly but also looking at wider competition, trade and planning policy. We should be restricting further harmful concentration (mergers, joint ventures) in the food sector which is over dominated by powerful and often global companies. Our recent Report Super market Failure exposes some aspects of the unfair UK retail sector and makes policy recommendations.

A good food culture in the UK should underpin the Labour policy. Everybody eats every day, and as such food is bound up in many cultural, social and psychological concerns. For many in the UK, we have lived through a food revolution in recent years. Our shops and markets offer a much larger range of produce than a few decades ago, reflecting a demand for ingredients to meet a much more developed sense of taste and interest in a range of cuisines. International visitors have recognised the improvement in our food, and the departure from a food culture with a hangover from wartime rationing. More British people

want to understand where their food comes from, how it is produced and who produced it. But this culture and these values are still not commonplace. For many, food that would once have been made from scratch, has been replaced with a ready meal or fast food. Still too many children do not know where their food comes from, part of a wider disconnect we have from our food production. Where once families ate together, many don't even have a dining table. In most workplaces, the lunch break has been replaced by a sorry sandwich sat at the desk. Food as fuel.

Underlying our food culture and many of the barriers to change, is government policy. Where it has been joined up, such as recent successes in school food, we have seen a change in standards and in culture. But for many years this country has lacked a coherent food and farming policy, and only recently seen the benefits of those emerging, mainly at local or sectoral level. The proposed Labour policy has the potential to provide the basis for such a coherent policy, but it needs to ensure that Food culture, and the principle stated in the Labour policy such as building knowledge and skills, are woven into the detail below. This means ensuring that community skills such as cooking and growing; ensuring that space to dine, cook, store and grow is planned and designed into new developments; schools provide farm visits; and more direct supply so citizens have a relationship with those who produce their food.

Right to Food

3. What form should a right to food take?

The UK has ratified a number of [international treaties](#) that proclaim the right to food, but this human right has not yet been incorporated into UK national law. There is a commitment to do so in Scotland (as part of Good Food Nation), with an important first step being imminent formal recognition in Scottish law and policy of the Rights of the Child.

Sustain is working with the Institute for Health and Society at the University of Newcastle, Just Fair and the Nourish Scotland network to champion formal adoption of the Right to Food into UK law. We have been undertaking advocacy work to prompt uptake of this approach with a broad range of academics, civil-society organisations, policy-makers and others.

With expert legal help and through consultation with food, sustainability, poverty and rights specialists, we are currently drafting a model Right to Food Bill, and would be pleased to share this and to discuss the key elements of this with parliamentarians. Sustain and our partners are able to offer a workshop on the Right to Food, to go through the details. Contact: Right to Food programme coordinator Imogen Richmond-Bishop: imogen@sustainweb.org.

The form that the Right to Food should take has two elements, of which more details are below:

- A. First, a legal framework that established purpose, duties and powers, and allocates responsibilities at both national and local authority level for progressive realisation of the Right to Food.
- B. Second, a cultural shift, enabled and informed by the adoption of the Right to Food in UK law, towards a sense of pride in our country being a place where everyone – by right – is able to enjoy an adequate, dignified and sustainably produced supply of good food.

Legal framework for the Right to Food

The adequate recognition of the Right to Food domestically would, for example, help embed [measurement of household food insecurity](#); give vulnerable people and their advocates the right to demand action on factors affecting people's personal circumstances (e.g. wages; housing and energy prices; and eliminating the 'poverty premium'), put a duty on local and national authorities to take practical steps and provide adequate resources to improve incomes long-term, as well as help people through crisis, and trigger a requirement for provision of helpful and dignified support, facilities and services (e.g. breastfeeding support, free school meals, meals on wheels), as well as the necessary funding and other resources to achieve these.

In fact, the UN made [important recommendations](#) in this regard, on the UK's progress on key Right to Food measures, noting that:

“The Committee [of the UN on Economic, Social and Cultural Rights] is concerned about the lack of adequate measures adopted by the State party [UK] to address the increasing levels of food insecurity, malnutrition, including obesity, and the lack of adequate measures to reduce the reliance on food banks.”

The Committee went on to recommend specific action to: promote and ensure improved access to healthier diets; support breastfeeding; introduce more fiscal measures to reduce junk foods and sugary drinks; consider adopting strict regulations on the marketing of such products; and to take action to achieve progressive realisation of the right to adequate food in the context of national food security.

Improving household food security is a cross-departmental responsibility, and requires action by many players, at national and local level. Any legislation seeking to apportion duties and responsibilities must take into account the ‘multiple actor’ and balanced nature of this work.

The draft Right to Food legislation being coordinated by Sustain's Right to Food programme (with partners as above) would require:

- Clear purpose and principles for the progressive realisation of the Right to Food, including establishment of the Right.
- A duty on every public authority to respect, protect and fulfil the Right.
- Establishment of clear outcome measures, towards which policy initiatives over time, across a range of government departments and local authority interventions, must demonstrably contribute.
- A duty on government to conduct regular and thorough assessments of household food security. In February 2019, the government committed to [measuring household food insecurity](#). The Bill would make this a routine duty, with a clear path to this data being used to inform policy.
- A duty on government to undertake a thorough assessment of law and policy, to identify areas where the Right to Food is being supported, and where it is being thwarted, to inform development of a Right to Food Strategy.
- Allocation of accountability for action within government, as part of implementation of the Right to Food Strategy.
- Allocation of responsibilities and accountability to specific government departments, with clear indications of the types of interventions that will be considered as relevant and appropriate, within each department's area of competence.
- Provisions for establishment of an appropriate body with adequate resources, or allocation of responsibilities and resources to an existing independent body (or bodies), to monitor progress and hold government to account. For example, the Food Foundation has recently recommended that a Children's Right to Food could be adopted by the government, with Children's Rights Commissioners playing a scrutiny role.
- Provisions for individuals or their representatives to be able to bring legal challenges, if the realisation of the Right to Food is inadequate, due to the action or inaction of a public body.

There are also duties and responsibilities that are applicable to local authorities. The Right to Food legislation should also set out requirements for local authorities to act, and provision for how the flow of resources, responsibilities and reporting requirements will relate to the national Right to Food Strategy. The types of responsibilities that could be placed on local authorities (given the adequate resources to fulfil them) are illustrated by the suite of measures that Sustain has for several years measured as part of our [London Food Poverty Profile](#) programme, measuring and comparing the progress of London boroughs for their implementation of practical action to alleviate food poverty. These include, for example, adopting a local food poverty action plan; paying the London Living Wage; promoting uptake of Healthy Start fruit, veg and milk vouchers for low-income pregnant women and children; providing meals on wheels services; supporting schools to provide free school meals for children from low-income families, and more.

It is also worth noting and underlining that the Right to Food is widely understood as being primarily about ending food poverty and hunger. However, we note that the path provided by the right to food takes us further than this, to more fundamental system-wide changes related to 'food sovereignty' – access to land, a safe and secure food supply, and sustainable production that ensures good food, protects natural resources and means decent and secure livelihoods for the food producers upon whom we all depend.

Sustain will advocate for the Right to Food being understood in this broader, systemic way. We will also support initiatives that take the UK along the path towards progressive realisation of the Right to Food, and in this context an initial focus on food poverty, and/or a Children's Right to Food would be good first steps. Implementation in law and an accountability framework is essential.

4. Should we be aspirational and visionary in our approach, or should we be measured and incremental?

The level of hunger and food poverty in the UK is shocking and unacceptable. We expect policy-makers to do all in their power to enable citizens to be able to eat well, and are ourselves increasingly focused on helping to re-frame the debate away from sticking-plaster solutions and towards permanent solutions.

The ambition can be aspirational and visionary. Zero hunger. Healthy diets. Childhoods free from the indignity of food poverty. Sustainable food production.

However, we fully recognise that progress must be made step by step. Our aim in the draft Right to Food Bill is a shift in approach that cultivates a system to govern collective responsibility for improving household food security in the UK. The legislation should catalyse systematic action by placing duties on public bodies, providing the necessary powers, and enabling accountability for delivering long-lasting solutions, in a justiciable way.

Legislation to achieve these aims should be framed as duties to undertake a range of actions to address those factors that affect people's ability to access a safe and reliable supply of nutritious, sustainably produced and affordable food – i.e. removing factors limiting or undermining the enjoyment of the Right to Food; taking action to ensure the progressive realisation of the Right to Food, in a fair, inclusive and non-discriminatory way; and including measures to ensure that food is sustainably produced as well as to ensure that households have adequate food to eat.

Sustain will advocate for the Right to Food being understood in this broad, systemic and aspirational way. We will also support initiatives that take the UK along the path towards progressive realisation of the Right to Food, and in this context an initial focus on eliminating hunger and food poverty, and/or a Children's Right to Food could be good first steps. For example, starting with a Children's Right to Food would complement the target to halve child obesity by 2030, and in order to achieve these it creates more weight for calls to enshrine free school meals as a right for all primary school children, not just infants, and/or for all children from families with a low income. Implementation in law and an accountability framework is essential, allowing for incremental improvement over time and no regression.

Sustain notes that a growing number of people and organisations are now talking the language of rights in relation to food, and we have witnessed a marked shift in enthusiasm for such an approach in for example the Scottish Government's development of the Good Food Nation strategy; as well as the End Hunger UK and Food Power civil-society networks. This marks a positive shift among those with lived experience of food poverty, and their advocates, towards food as a fundamental human right and something for which public bodies and policy-makers should be held accountable. It also signals that there would be warm support for policy-makers adopting a more visionary and effective approach on the serious issues associated with the Right to Food.

Further, we note that the government has in June 2019 launched a National Food Strategy, with [Terms of Reference](#) that include an ambition to “deliver safe, healthy, affordable food, regardless of where people live or how much they earn”. Sustain has warmly welcomed the National Food Strategy process. We hope that the principle of having a National Food Strategy should be accepted by all parties. The concept of the Right to Food should be central to the Food Strategy.

5. Should we establish in law a universal right to healthy food or should we first prioritise the rights of access to healthy food for certain population groups, such as school children; expectant mothers; elderly and vulnerable people receiving care?

Sustain supports the establishment of a universal Right to Food in UK law, with provisions for the duties, accountability and process for progressive realisation of that right over time. We are open to the idea of an initial focus on specific groups such as children, expectant mothers and/or people living in care settings or in receipt of care services. We would also advocate this being established within a more ambitious framework for the progressive realisation of the universal Right to Food over time.

The nature of all human rights should be that they are universal and indivisible. We do not see a conflict in enshrining a universal right to healthy and sustainable food, and then adopting specific policies and programmes to enhance the fulfilment of those rights for those identified as most vulnerable.

Below, we set out some initial examples of policies that could be implemented as part of a Right to Food Strategy, focusing first on the most vulnerable, with simultaneous adoption of policy measures to:

- Prioritise action to improve the accessibility and affordability of healthy food, through action to secure adequate household income, and control of everyday essential costs, for those most disadvantaged or in low-income households.
- Ensure all children in any state-funded school have their right to healthy food met, through provision of high School Food Standards, a mandatory national Healthy Schools Ratings System and free school meals for all primary school children (regardless of socio-economic status, extending from universal infant free-school meals) and all secondary school children from households in receipt of Universal Credit (as per Labour’s own campaign in 2018).
- Mandatory healthy and sustainable food requirements for all NHS Hospitals, state-run care settings and nurseries, for the benefit of NHS patients, older and vulnerable people, very young children, public sector staff and visitors.
- Protection of all children from exposure to high fat, salt and sugar (HFSS) food and drink advertising, promotions and marketing, including a ban on the use of child-friendly characters (licensed or brand mascots) on packaging and any HFSS foods sold in out of home settings; a comprehensive 9pm watershed on HFSS advertising, tough restrictions on in-store price and location promotions, mandatory traffic-light food labelling and calorie labelling in all restaurants and out-of-home catering services; tighter regulations on food labelling and health claims on foods targeted at infants (in line with breastmilk marketing regulations); a ban on the sale of energy drinks to all under-18s (not just under-16s) in line with alcohol restrictions.
- Extension of the Soft Drinks Industry Levy to milk-based sugary drinks, and consideration of further fiscal measures to make unhealthy food options more expensive than healthier options, and incentivise product reformulation (in for example, confectionery and everyday breakfast cereals).

6. Should there be a duty to provide food or should the duty be to avoid hunger, or malnutrition?

We envisage the Right to Food being progressively realised when:

- Everyone has adequate food – having the means to buy, grow or cook adequate food. This can be realised by a range of measures, primarily through action to ensure adequate household incomes. ‘Adequacy’ also means that the food should be healthy, so progressive realisation of the Right to Food also includes action by government and industry to improve the quality, accessibility and affordability of healthy food; whilst reducing the dominance of unhealthy food and its marketing.
- Everyone dependent on a public institution for all or part of their sustenance having adequate food – this means mandatory quality, nutrition and sustainability standards for food in nurseries, schools, hospitals, care settings, prisons and service organisations such as the police and the armed forces.

We envisage the Right to Food being progressively realised as part of a Right to Food Strategy, with duties and accountability for policy-makers in a range of government bodies and national and local institutions. The Right to Food is universal, but we recognise that the Right to Food Strategy is likely to have an initial focus on eliminating hunger and helping those most vulnerable to eat well. This should incorporate considerations of both the quantity and quality of food – i.e. tackling both hunger and nutritional adequacy together. This is important to ensure that interventions focus on fresh and healthy foods, prioritising fruit, vegetables and wholegrain foods, and not promoting highly processed and HFSS foods that can contribute to greater health inequalities.

Land

7. Is there a need to review and reform land law and public land management systems in order to underpin a sustainable food system?

We would suggest this is a key area for review given the huge inequities around land ownership, land prices, the sale of public land for private profit, taxation and enforcement of environmental protections. Issues of tenancy are crucial for thousands of tenant farmers and short tenancies can mean an inability to invest in more sustainable farming systems and features such as tree planting. We also need to consider how to ensure land is available for new entrants into farming.

8. Should we establish a Land Commission to conduct a review and make legal recommendations and, if yes, what should its remit be?

We believe such a Commission would be useful given the legal complexities around land ownership and development. We would recommend this is undertaken in such a way to allow all stakeholders to be involved, from community land users and workers and not only experts and land owners.

9. Should we seek to integrate our vision with that of the devolved administrations which operate under different systems?

We would suggest that the administrations coordinate to learn from good practice, particularly where Scotland have explored this area recently. As such an integrated vision might still allow for devolved ownership.

10. What should a sustainable land policy look like?

A sustainable land policy needs to be developed in collaboration with all types of current and potential users and to be underpinned by a strong policy of sustainable development – with equity, health and environmental as the basis. It needs to encompass all land use and consider best use rather than merely for growth and GDP. A Land policy also needs to be global in vision and recognise the need to tackle the major global issues including climate change, poverty, and biodiversity loss as well as health problems such as obesity. These are all affected by what we choose to do with not only UK land but our global land take (including land use embedded in the products we buy such as food, metals and timber), extraction and ownership.

Food production and distribution

11. What are the national and international barriers, legal, commercial or administrative, that might constrain our development of sustainable, healthy and efficient food systems?

For the last 40 years the UK has been trading as a member of the EU. Currently there is disagreement in the UK Parliament as to whether we should remain in a customs union with the European Union as we exit the EU. The ultimate choice we make on this, alongside whether or not to remain in the single market, or closely aligned with it in order to facilitate trade, will have a huge impact on our food system.

At the moment, there is little or no parliamentary scrutiny over future trade deals. Preparatory discussions are already underway with a number of countries, including the United States, but there is no transparency. We are not allowed to know the substance of those discussions, and the Sustain Alliance believes we should. We are calling for a number of things, including complete trade transparency, formal consultation mechanisms and impact assessments, time for parliamentary debate, a maintenance of our current food, environmental and animal health standards, and trade deals which deliver on international objectives to which we have already signed up.

UK consumers have already made it clear that they do not want to lower food standards in exchange for trade with the United States, or indeed any other country, but we are concerned that the UK government will be so keen to strike a deal that they will override this view.

We are also concerned about the potential impact that future trade deals might have on commitments made at home on farming standards. For example, the UK is trying to reduce its use of medically critical antibiotics in farming. It has had some success with this, but needs to go further. We would not like to prop up poor farming standards in other countries, for example, the United States who use around 4 to 5 times the amount of antibiotics that we do – often to compensate for low animal welfare or hygiene standards. It is simply not good enough to claim that this will ultimately be for consumers to decide – eg that if they don't want to eat this food, they won't have to. Current food labelling regulations mean they simply won't know what they're eating, particularly considering an increasing amount of food is eaten out of home

We are particularly concerned about the potential impact of Investor State Dispute Settlements -the so called 'corporate courts'. These have the potential to completely undermine a nation state's ability to set its own agenda in human and environmental health. Examples include a high fructose corn syrup company suing Mexico when it tried to implement a sugary drinks tax and a water company suing the Argentine government when it tried to freeze water rates to help consumers weather their financial crisis. Corporations in the United States are already demanding these be included in a future US/UK trade deal and we would like them removed.

12. What measures should we take first to ensure local food production is environmentally and economically sustainable?

Below we outline those steps that would underpin an increase in local food systems, and production that is environmentally and economically sustainable. This requires action right across the supply chain to ensure the market supports these production systems. On top of these we would advocate support for, and acknowledging the role of, food partnerships to ensure these actions are championed in local areas and communities across the UK.

Fishing

[According to Defra](#) at the moment only one third of UK fish stocks are in a healthy state. Some of UK's cod, herring, plaice, scallop, langoustine and seabass catches are considered 'fish to avoid' –because stocks are depleted or fishing is seriously damaging to the environment. Businesses that have adopted a sustainable fish policy can't buy these fish, including public-sector caterers, so our fishers are missing out on some of the best markets for their produce. If depleted stocks were allowed to recover, our fishing industry could yield [45% higher landings, worth £1.4 billion to the economy, and 2,400 jobs](#).

We are recommending the following to address this:

- Firstly, we recommend a bold target for our seas, comprising of recovering fish stocks *AND* protecting wider ecosystems in the ocean (partly because the former is reliant on the latter, partly because our marine ecosystems are so valuable for recreational fishing, tourism and resilience to climate change). This bold target should be that all fish caught by UK boats is verifiably sustainable within 10 years, ie they are certified sustainable or considered 'Fish to Eat' by the Marine Conservation Society. This would deliver jobs, boost incomes for coastal communities and open up better markets for UK produce, and would involve:
- Establishing a legally-binding requirement to fish at sustainable levels (Maximum Sustainable Yield) as soon as possible. Without intentions set out in law, there's no guarantee that short term interests won't overtake sustainability aims.
- Reallocate quotas. Fishing policy is unfair on the small-scale fishing fleet. They make up [79% of British fishers but have access to only 2% of the UK's fishing rights](#) (quota). A different system could see more flexibility, more quota for the small-scale fleet (who employ more people per tonne), and quota used to encourage sustainable fishing.
- Improve data collection on the state of all UK fisheries. The status of about [one third of UK stocks is unknown](#). We therefore don't have the scientific data to manage these assets properly, which means that we can't possibly certify them (or sell them) as sustainable, or identify what action is needed to get them to a sustainable state. Full assessments for data deficient fisheries would cost an estimated £30 million annually – which initially could come from whatever the UK replaces the EU's Maritime and Fisheries Fund with. To put this cost in context, the UK could catch fish worth an additional £1.4bn to the UK economy if all stocks were recovered.
- Establish the 'public money for public goods' principle in fishing. At the moment this principle applies in farming and farmers receive financial support for responsible practices such as protecting habitats. There is no such principle in fishing.

Production

Whilst a certification for 'local food' is meaningless, as it relates to where it is purchased, not where it is produced, there are other ways in which this aim can be realised.

- Mixed farming is at the heart of sustainable food production, and this needs to be more specifically recognised within future agriculture policy.

- Targets and investment for increased certification of local and environmentally-friendly food production. A target of 10% of land being certified Organic is achievable in ten years with the right investment and a parallel commitment through public procurement and marketing to ensure the demand is present. Similar targets and investments for conversion to (and certification of) Pasture-fed, LEAF marque, RSPCA farm assured, Biodynamic, and other schemes should be planned.
- Introduce a quantitative pesticide reduction target (*this would have a knock on effect of reducing residues in food*)
- In addition to tax relief/targeted support for farmers practicing agroecological methods (which include Integrated Pesticide Management - IPM) we would also like to see:
 - The creation of a new independent extension service for research, development and dissemination of IPM techniques
 - Measures to facilitate farmer-to-farmer learning on IPM
- Recognition of traditional production methods and locally specific produce is at the heart of the PDOs (Protection of Designation of Origin) and PGI (Protected Geographical Indication). The value to the UK economy of artisan foods with protected names is £1Billion, which sell on average at 2.23 times the price of products without similar protection and offer great export potential [[Informa](#)].
- What we produce is as important as how we produce it – there needs to be more focus on how farm payments and other forms of payment or policy could influence the market to better encourage the increase in pulse production, orchards, and more broadly horticulture in line with government health guidance and shift to climate friendly farming.

Processing, Supply, Retail and Catering

(see also the answer to Q13 on effective regulation and Groceries Supply Code of Practice (GSCOP) to protect suppliers from unfair trading practices)

- An investment plan for local food infrastructure e.g. abattoirs, processing facilities, wholesale markets, local food hubs, CSAs in coastal and rural communities funded by whatever replaces EU funding e.g. UK Shared Prosperity Fund
- National action plan for increasing retail diversity with investment in markets, co-ops, box schemes, independent and symbol group shops towards 10% target of retail share
- A commitment to use local horticulture for Government funded food schemes (e.g. fruit and veg in schools, Healthy Start)
- Applying mandatory climate- and nature-friendly standards to all of the £2.4bn public money spent annually on food in public sector catering, including less and better meat and dairy; more seasonal fruit and veg; zero waste; certified sustainable ingredients; and verifiably sustainable fish.
- Advocacy (and later targets) for public sector money to support local suppliers e.g. Preston Model, or using dynamic purchasing systems e.g. Fresh Range in Somerset and Bath.

Marketing

- Restrictions on use of misleading terms in marketing through publishing legal definitions for terms e.g. in bread having definitions for sourdough, artisan, wholemeal, craft, and fresh would mean those actually producing to these higher standards would get more trade, which incidentally would lead to more jobs
- Easily accessible information on ingredients in store (as well as online) for all products and meals, as well as chemicals used in production e.g. pesticides.
- National education and promotional campaigns to include eating seasonal British fruit and veg in support of increasing healthy and environmentally sustainable diets.

13. What most constrains the economic and environmental sustainability of food producers?

Concerns around environmental sustainability are rarely woven into the mainstream food system, and too often any attempts to support healthier and sustainable produce are token gestures. This means that those producers that are more socially and environmentally progressive are often put at an economic disadvantage.

Below are a couple of examples where the contrasts between economic and environmental priorities are evident.

The Food and Drink Sector Council has no representation from environmentally sustainable businesses or SMEs, the latter making up the bulk of the food and farming sector. Instead the Council includes Merlin entertainments who provide largely HFSS products at tourist destinations.

The Food and Drink Sector Deal, which no doubt will provide millions of Government investment to the sector, includes no mention of environmental sustainability or social commitments.

Any government funding, be it for food procurement or farm subsidy or investment in innovation should abide by a set of key criteria which would help shift the food, drink, farming and fishing sectors to be more sustainable. Working with the Greater London Authority, Sustain has produced a set of criteria which were used in considering the distribution of small grants to support innovative food enterprises. The Greater London Authority are now looking at developing this and applying it to a wider range of funding and support that they provide. We would advocate that criteria such as these could be used in any government support for food businesses.

This commitment to environmentally friendly food should go beyond just public spending, and to advocacy or regulation across the wider supply chain. For example, we would suggest that a ban on the sale of endangered fish should be considered. More broadly, a commitment to a plan for increased sale of Organic or other agro-ecological certification to 10% of retail market would help provide a clarity of focus for this sector.

14. How can we best tackle food waste?

The United Nation's Food and Agriculture Organisation (FAO) estimated that each year, one-third of all food produced in the world for human consumption never reached the consumer's table. If food waste were a country, it would be the third largest emitting country in the world.¹

Food waste has obvious implications for climate change but when we throw food in the bin, we are also effectively throwing away all the energy, labour, water and natural resources that went into making that food in the first place. Global food waste is enough to feed three billion people, so the consequences of food waste are economic, environmental and humanitarian, and simply unacceptable.

In the UK estimates put food waste at around 10 million tonnes, 70 per cent of which was intended for human consumption. This equated to a quarter of all food purchased and a value of over £20 billion a year, and would be associated with more than 25 million tonnes of

¹ FAO (2015), Food Wastage Footprint & Climate Change, UN FAO, Rome

GHG emissions. By weight, household food waste makes up around 70 per cent, manufacturing 18 per cent, hospitality and food service 10 per cent and retail 2 per cent.²

Estimates of food waste at the farm level are not as well developed. Lack of research in this area is striking when compared to food waste at the household level, which has been extensively researched and has been the subject of many campaigns. New research undertaken by WRAP in 2017 for two important crops, strawberry and lettuce, concluded that £30 million of food ended up as waste (9% of strawberry production and 19% of lettuces grown). If extrapolated this could equate to 2.5 million tonnes a year of food waste pre-farm gate, worth around £800m.³ Farmers surveyed by Feedback estimated similar amounts, an average 10–16 per cent food wastage on typical years.⁴

The reasons for food waste are varied and reach every step of the supply chain. At the farm level, supermarkets' business practices often drive waste. Trading practices, including order cancellations, last minute changes to forecasts, retrospective changes to supply agreements and the use of cosmetic specifications to reject produce, all cause food to be wasted.

At the household level, passing a date label or simply not getting around to eat food before being judged to have gone off triggered disposal.

Enhanced waste reduction and management: prevention first, in line with the Food Waste Hierarchy, a legal requirement since the EU Waste Framework Directive (2008). Current fiscal measures incentivise the movement of food waste away from landfill through the Landfill Tax, and towards anaerobic digestion, which is incentivised through various subsidies such as feed-in tariffs. Nevertheless, there is currently no incentive to prevent food waste in the first place, which is higher in the food hierarchy. Penalties should be introduced for lower stages of the food use hierarchy, like anaerobic digestion and landfill to remove incentives to overproduce. The income generated could be used to finance food waste reduction initiatives for consumers and businesses.

Measure farm level waste and set targets from farm to fork: the current target to reduce food waste in the UK is a modest voluntary agreement of 20 per cent between 2015 and 2025. This doesn't go far enough and does not include waste at the farm level. A more ambitious national target would be to reduce food waste by 50 per cent from farm to fork by 2030.

Retailers' trading practices: the Groceries Code Adjudicator's remit includes direct suppliers, but not indirect suppliers, such as farmers who use middlemen to sell their produce to retailers. So the remit should be expanded to include indirect suppliers. (This is also relevant to question 13).

Retailers should relax their cosmetic standards to ensure diversity of shapes, colours and sizes – factors that don't affect the taste or quality. A number of retailers are taking action and selling 'wonky veg boxes' at a reduced price. This is a positive movement but farmers need to get paid a fair price for their crops regardless of minor imperfections in their produce.

Food waste to animal feed: Feeding pigs using our surplus food isn't a new idea; it has been around for thousands of years. Today, despite the millions of tonnes of food waste,

² WRAP (2018), Food Surplus and Waste in the UK – Key Facts. Accessed online 11/02/2019 <http://www.wrap.org.uk/sites/files/wrap/Food-Surplus-and-Waste-UK-Key-Facts-23-11-18.pdf>

³ WRAP (2017), Food waste in primary production – a preliminary study on strawberries and lettuces. Accessed online 02/02/2018 <http://www.wrap.org.uk/content/food-waste-primary-production-preliminary-study-strawberries-and-lettuces>

⁴ Feedback (2018), Farmers Talk Food Waste Supermarkets' role in crop waste on UK farms

pigs and chickens are primarily fed on pulses, oilseed and cereal crops, using up valuable resources that could be used to feed people directly. This practice is not only wasteful, it is also expensive. UK pig feed costs account for 62 per cent of total pig production costs and UK pig producers battle against very tight margins.⁵

The current ban on using commercial catering waste and surplus food as feed should be lifted. This ban should be replaced with robust legislation regulating the treatment of surplus food in off-farm licensed processing facilities so that it can be safely fed to pigs and chicken. This is already practised in Japan, New Zealand and several states in USA. This should be accompanied by research into the most effective methods for transforming food waste into feed that fits the nutrition needs of farm animals and tested with pilots involving all the stakeholders in the food chain from feed to plate.

Packaging waste: whilst many of Sustain's members do much more work on packaging waste, we want to highlight the problems of single use plastic bottles and a solution for reducing their use. An ambitious plan for installation of tens of thousands of drinking fountains nationally would help increase water availability and reduce plastic bottle waste. Through a combination of public, private and crowd-funding, we believe this could be an affordable way to invest in infrastructure that would have a lasting impact. Tooth decay is the number one reason for children being admitted to hospital (including 26,000 5-9 years olds), with sugar and fizzy drinks being key culprits.

15. What changes are needed to improve working conditions and safety in the food production and distribution industries?

We advocate the following measures:

- Establishment of a new body to allow agriculture workers in England to negotiate collectively for fair pay and conditions (as they can in Wales and Scotland) and to enhance the status of farm work to attract recruits into the industry.
- Greater enforcement of current food safety legislation and commitment to totally independent inspection and testing of foods by non-food industry related bodies.
- Reverse cuts in resources to enforce labour standards in the food system to end worker abuse in the UK food system in terms of pay and conditions and monitor and eliminate modern slavery from the supply chain here and overseas.

16. What regulatory measures could reduce economic volatility and provide long-term security in the farming and fishing sectors, and for food producers and their employees?

Much of what we would advocate here is already included in our answer to Q12. Beyond this we would suggest:

- Targets for the adoption of certified Living Wage employers across the food sector, with tax breaks for those companies renewing certification
- Bring into UK law a new EU directive on unfair trading practices (UTP) in business-to-business relationships in the agricultural and food supply chain.

17. What workforce does a thriving and sustainable food industry require?

18. What measures could deliver the necessary knowledge and skills base in the food industry, and what might encourage new entrants, apprentices or trainees?

⁵ Feedback (2018), Feeding surplus food to pigs safely: a win-win for farmers and the environment London: Feedback.

We would suggest the following as answers to both Q17 and 18:

- Tax breaks for farmers who allocate/sub-let some of their land to new entrants or enterprises supporting new entrants. Models such as the [ecological land cooperative](#) or [Farm Start](#) provide a vital stepping stone for new producers.
- Investment in local food infrastructure as outlined in answer 12, should stimulate a network of local food hubs that can provide a range of training for start-ups and SMEs e.g. models like the training kitchen run by Greenwich Cooperative Development Agency are effective financially viable models.
- Training for public sector catering and procurement staff to help them to meet Government standards around providing healthy and sustainable food.
- Create a national business advice programme targeting sustainable SME food businesses and social enterprises to enable growth in this area, focused on sustainability e.g. those enterprises trading in agro-ecological products.
- Create a plan, with policy and investment commitments, for the improvement of food skills through the food system and general public.

19. What steps could be taken to encourage faster or better take up of different, newer emergent technologies in our food production and distribution industries?

We support any moves to encourage innovation, and would hope that this would stretch to social and political innovation as well as technological, and that these should apply more broadly than production and distribution in order to achieve the broader aims of the proposed Labour policy.

We believe that an innovation fund should be established (which could be part of the Food and Drink Sector Deal or a UK Shared Prosperity Fund) which uses ethical criteria, along the lines suggested in question 13. The approaches advocated in Government strategies to tackle child obesity, including industry targets and legislation are welcome and this approach should be adopted in a Food Strategy and applied to a broader set of issues. A mixture of such carrots and sticks ultimately are needed to both mother such innovation, and then mainstream it.

Any innovations that are encouraged should be thoroughly tested against the other priorities of the proposed Labour policy to ensure that they do not create or exacerbate health or environmental problems, or impact on livelihoods or quality of life. For example, we would advocate robust regulation and monitoring of the use of biotechnology. Separately, as already mentioned above, the increase in food delivery apps, has made it easier for people to eat what they want, where they want, when they want, but this level of convenience comes at a cost as the food offered is predominantly High in fat, salt and/or sugar (HFSS), further contributes to reduction in cooking skills, and it makes the alternatives e.g. retail of fresh ingredients less economically viable which in some areas will mean less availability. The production of food offered through these apps has led to the rise of 'dark kitchens' where the poor working conditions and pay have received much criticism, but little in the way of regulation which currently applies to other retailers and catering outlets.