

Ethical Hijack

Why the terms “local”, “seasonal” and “farmers’ market” should be defended from abuse by the food industry



A report by Sustain: The alliance for better food and farming
January 2008



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Consumers are more and more interested in the where their food comes from and how it is grown. They want to do their bit to help protect the environment, help farmers get a better deal, and improve animal welfare – and they need the right information to help them to do so.

In a world full of conflicting messages and confusing environmental claims, certain descriptions and concepts help consumers navigate their way to more ethical choices. Eating **seasonal** food, for example, can help us to reconnect with the seasons and reduce greenhouse gas emissions – the food can be grown in natural conditions, and does not need to be stored or refrigerated for long, or transported very far. Eating **local** food can help us to use our purchasing power to give farmers a decent income and to reduce how far food has traveled. Meanwhile, the booming popularity of **farmers’ markets** demonstrates that consumers are increasingly interested in supporting local farmers, eating a more seasonal diet and making a personal connection with the people who grow their food.

Local, seasonal food is valued by consumers as being fresher, tastier and more nutritious.¹ As the National Consumer Council (NCC) says, “*Seasonal food can offer better taste and be more affordable, while local food can deliver freshness, reduce food miles, offer benefits to local farmers and communities and help reconnect consumers with where their food comes from.*”²

The mainstream food industry is keenly aware that terms such as “seasonal”, “local” and “farmers’ market” are attractive to consumers. Such terms have come to symbolise many of the qualities of a more ethical and sustainable food system, and many food producers do make genuine efforts to improve the environmental and ethical credentials of their products. Many such producers are working at a small scale and investing a great deal of time and effort – sometimes supported by public money – in developing a market for more sustainable food.

But their efforts are being hijacked. Big food companies and supermarkets have begun to abuse these valuable words and concepts by applying them to products and practices that we believe do not deserve such ethical or environmental credentials. This report seeks to highlight some of these disturbing practices, and to set out a case for why terms such as “local”, “seasonal” and “farmers’ market” should be defended from abuse by the food industry. We should protect the meaning of such terms so that consumers can continue to exercise their choice to support sustainable food, to prevent companies from applying ‘green-wash’ to products and practices, and to allow fair competition by preventing companies with low or no standards undercutting those with higher standards.

References

1. Institute of Grocery Distribution, *Retail and Foodservice Opportunities for Local Food*, March 2006
2. National Consumer Council (2006) *Seasons’ Promise: An enjoyable way to tackle climate change*, by Sue Dibb, Joanna Collins and Ed Mayo, see: www.ncc.org.uk/nccpdf/poldocs/NCC133_seasons_promise.pdf

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Information in this report has come from a variety of sources. We are particularly grateful to Natural England, FARMA and the National Consumer Council for helpful information. However, the interpretation expressed and presented here remain our own and should not necessarily be taken as the views from any of these organisations.

This report has been compiled by Sustain: The alliance for better food and farming. Sustain is a not-for-profit organisation that 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. Many of our projects and member organisations promote healthy, local and sustainable food – see: www.sustainweb.org.

What should happen next?

Sustain has two very simple demands:

1 We call on the Food Standards Agency (FSA) – the UK government’s consumer watchdog on food issues – to issue guidance to food enforcement officers and industry on use of the terms “local” (and related claims of provenance or geographical origin), “seasonal” and “farmers’ market”. We urge the FSA to work with the Department for the Environment, Food and Rural Affairs (Defra), to adopt and champion criteria for such terms that genuinely and clearly embody the high ethical and environmental values expected by consumers.

We ask the FSA to tackle these issues as a matter of some urgency. We note with concern that the FSA and its predecessors have taken 42 years to come to an agreed definition of the relatively simple marketing terms “fresh”, “natural” and “pure” (see page 4). The ethical and environmental terms at issue in this current report are lynchpins in consumers’ ability to make choices that can reduce greenhouse gases and climate change. We do not have the luxury of a 42-year policy process to ensure that rogue elements of the food industry cease abuse of such terms. The criteria put forward in this report (see Appendix II, III and IV) are already applied in many settings, are workable, and recognised by increasing numbers of consumers. We should work towards implementing them without further delay.

To reinforce this need, we understand from enforcement officers (trading standards officers and environmental health officers) and their coordinating body (LACORS – the Local Authority Coordinators of Regulatory Services) that they would welcome early guidance on the important issues dealt with in this report, which are already emerging throughout the UK as problems in labeling and marketing.

2 We call on the food industry to cease using terms such as “local” (and related claims of provenance or geographical origin), “seasonal” and “farmers’ market” to describe products and practices that do not deserve such ethical or environmental credentials. We further urge the industry to accept the criteria that genuinely and clearly embody the values expected by consumers.

The Food and Drink Federation and the British Retail Consortium – the industry umbrella groups that represent many of the large food manufacturers and supermarkets featured in this report, as well as the Advertising Standards Authority and LACORS should recognise that this is an issue of national concern should bring to an end such misleading practices.

Let's not wait 40 years!

Sustain is alarmed at the time it can take for matters of public concern to be dealt with by government. We urge the FSA to tackle the issues raised in this report quickly. The FSA and its predecessors took 42 years to come to an agreed definition of the simple marketing terms “fresh”, “natural” and “pure”. We should not have to wait 42 years for regulators to defend the ethical and environmental terms “local”, “seasonal” and “farmers’ market”.

The following story gives ample evidence for our concerns...

42 years ago...

1966 – the Food Standards Committee (FSC) of the former Ministry of Agriculture, Fisheries and Food (MAFF) issues a ‘Report on Claims’ saying that the adjective ‘fresh’ “should be used with a good deal more discretion than at present”, and that ‘pure’ should be “confined to products which contain no additive of any kind”.

35 years ago...

1973 – the FSC expresses concern over the misleading use of the word ‘natural’.

29 years ago...

1979 – the FSC’s ‘Second Report on Food Labelling’ states: “There are general claims where some of the terms used have become virtually meaningless [...] by application in too widely differing circumstances (e.g. ‘fresh’).”

28 years ago...

1980 – the FSC recommends a voluntary code of practice for industry for the use of ‘fresh’, ‘pure’ and ‘natural’. The report:

- Considered that phrases such as ‘farm fresh’, ‘freshly harvested’ and ‘ocean fresh’ were intended “to have an emotive effect”, but “they have no real meaning”.
- Recommended the word ‘natural’ should only be used for non-synthetic colours and flavours made of biological material, and “to mean a raw, unmixed unadulterated and unprocessed product with no additions”.
- Recommended that ‘pure’ should mean “no additions have been made, whether additives or nutrients... the food is substantially free from contaminants, anabolic agents, chemical fertilisers and pesticide residues”. It also recommended that ‘pure’ should not be used for foods that had been cooked, frozen, chilled or dried.
- The report also cautioned against using ‘real’ and ‘genuine’ as they were “advertising hyperbole”.

21 years ago...

1987 – Trading Standards Officers (TSOs) conduct a survey of the use of the term ‘natural’ and its derivatives and found over 80 different variants. The TSOs questioned the adequacy of the law to deal with such claims without a legal definition of the word ‘natural’. They found that 79% of the samples using such terms were “unacceptable or misleading” (a further 11% being “doubtful”).

19 years ago...

1989 – the Food Advisory Committee (FAC) of MAFF issues voluntary ‘Guidelines on the use of the word natural and similar terms’. It states: “We are concerned that the concentration on ‘naturalness’ is diverting attention from more important nutritional messages.” It says that claims such as ‘natural goodness’, ‘naturally better’, or ‘nature’s way’ “are largely meaningless and should not be used”.

8 years ago...

- March 2000 – the FAC (now part of the Food Standards Agency, which was set up in 2000) commissions research to determine consumer attitudes towards ‘fresh’, ‘pure’, ‘natural’ and similar terms on food labelling.
- October 2000 – the FAC draws up voluntary guidelines on the use of such terms, to be issued for consultation in 2001.

6 years ago...

In 2002, the Food Standards Agency (FSA) issues guidelines for use of the terms ‘fresh’, ‘natural’ and ‘pure’, emphasising that these are voluntary. They are intended as guidance to food manufacturers and enforcement authorities.

4 years ago...

In 2004, the FSA carried out a survey, “An investigation of the use of the terms such as natural, fresh etc. in food labelling” that looked at the extent to which industry was taking account of the 2002 Guidance, and to help inform whether it should be revised. Of the 220 samples examined, 88 (40%) were considered by the participating public analysts not to follow the 2002 Guidance.

2 years ago...

In 2006, consumer research appears on the FSA website, examining what terms such as ‘fresh’, ‘natural’ and ‘pure’ mean to consumers.

4 months ago...

The FSA once again issues a consultation on the use of the terms ‘fresh’, ‘natural’ and ‘pure’, and adds to the list of terms to be reviewed: ‘traditional’; ‘authentic’; ‘real’; ‘genuine’; ‘farmhouse’; ‘handmade’; ‘selected’; and ‘top of range terms’ such as: ‘quality’; ‘premium’, ‘finest’ and ‘best’.

January 2008...

January 21, 2008 is the Food Standards Agency’s submission deadline for comments on the terms ‘fresh’, ‘natural’ and ‘pure’ and other related terms. In the consultation document, the FSA acknowledges that: *“It is not appropriate to use any marketing term unless its meaning is clear. For example, the term ‘seasonal’ might be applied successfully to UK grown strawberries in the summer months but could be misleading when applied to imported strawberries in spring or autumn.”* The FSA also notes in the same document that the Guidance does not apply to the word ‘seasonal’.

References: Research before 2001 summarised from *Food Magazine* 52, Jan/March 2001, www.foodcomm.org.uk. Information since 2001, from the FSA website: www.food.gov.uk.

Defending 'local' & 'seasonal'

Why are 'local' and 'seasonal' important?

The food we eat is being transported further than ever,¹ and there are increasing sales of a wide range of ready-prepared and exotic out-of-season produce. These trends are associated with all sorts of environmental and other problems, such as:

- **Loss of freshness, flavour and variety.** Long-distance fruit and vegetable varieties tend to be chosen for their yield and keeping qualities, not for flavour, diversity or nutritional value. Many are harvested before they are ripe, and stored over long periods between production, packing and distribution, sometimes with post-harvest chemical treatments such as fungicides to increase shelf-life. Soft fruits and tender vegetables go off quickly – so those that travel long distances have to travel fast, usually by air, which is the most environmentally damaging form of transport.
- **Increasing global warming.** Food transport, even if it is not by air, creates greenhouse gas emissions that are contributing to the increasingly devastating effects of climate change.²
- **Paying more for less.** Instead of rewarding growers with fair prices for locally grown, seasonal produce, we pay for the costs of transport, refrigeration and packaging associated with long-distance food.
- **Loss of food security.** We need to invest in a UK food and farming system that is resilient to major changes, such as surges in oil prices, extreme weather (such as floods or droughts) or competition from other crops such as biofuels. Otherwise, we face the prospect of increasing food prices and shortages.
- **Loss of food culture.** Distinctive varieties of fruit and vegetables and native breeds of meat are integral to our culture and landscape. Long-distance food erodes seasonal and local distinctiveness in favour of boring uniformity.
- **Loss of food knowledge and skills.** Most of us have lost our connection with the land and seasonal rhythms, and have little or no awareness of when and where various foods are produced.

What are consumers advised to do?

There is growing consumer demand for more seasonal and local food. Two thirds of consumers say they are trying to buy more seasonally,³ and at least a quarter of visitors to restaurants specialising in ethnic cuisine want more healthy dishes featuring fresh, local ingredients.⁴ This is because local, seasonal food is seen by consumers as being fresher, tastier and more nutritious.⁵ As the National Consumer Council (NCC) has noted, *“Seasonal food can offer better taste and be more affordable, while local food can deliver freshness, reduce food miles, offer benefits to local farmers and communities and help reconnect consumers with where their food comes from.”*⁶

Sustain advises consumers and others that they can support and encourage local and seasonal food by:

- Buying fresh food when it is in season – asking for seasonal food in your local shop, restaurant or canteen;

- Buying fresh produce from a farmers' market or via a box scheme that guarantees that what you receive is in season;
- Joining a food co-op so that friends and colleagues can bulk-buy seasonal produce at an affordable price;⁷
- Asking for British fruit and vegetables produced to the standards of a recognised assurance scheme, such as certified Organic, LEAF-Marque⁸ or Assured Produce.⁹

But what do consumers see when they buy local and seasonal food?

There are many social enterprises, businesses, manufacturers and caterers who are making efforts to use genuinely local and seasonal food.

However, their efforts are being undermined by the growing use of terms such as 'local' and 'seasonal' to market foods, often promoted with evocative imagery of local production, that we believe do not comply with these ethical and environmental credentials. We have found many examples of these terms used in ways that could be highly misleading to consumers – with examples from nearly all of the leading supermarkets in the UK.

One household-name company – Heinz – has also recently used the term “farmers' market” in a high-profile advertising campaign, to apply to produce that were neither local nor seasonal, and had not been sold direct to consumers by the farmers. At the time of writing, these claims are currently the subject of vigorous complaints to the Advertising Standards Authority (ASA) by Sustain and others who wish to defend genuine farmers' markets and the values they uphold.

Is it really local?

Provenance labelling has taken on great public and political significance over recent years, motivated by a range of concerns. For example, research by the Institute for Grocery Distribution (IGD) suggests a significant increase in the number of people wanting to see UK and local produce information on packaged food and food in catering outlets.¹⁰ This, says IGD, is driven both by a desire to support local food producers and a desire to reduce the environmental costs of food, such as food miles. Public concern also revolves around differences in standards between the UK and other countries (especially meat quality and animal welfare), and the spread of animal diseases such as foot-and-mouth and bird flu.¹¹ Because of public concerns and food safety requirements, regulation of provenance labelling has therefore generally focused on meat and other products of animal origin.

Public and media suspicion is that many products marked as 'local' may actually be imported, have travelled many miles – even crossing country borders – or disguise major constituents that have been reared or grown elsewhere and only processed in the UK. Stories about such practices appear in the media on a regular basis. Some of these are isolated incidences of deliberate fraud, and are generally uncovered by local authority trading standards investigations¹² or media enquiries.

However, we understand that increasingly centralised distribution methods of the major supermarkets mean that such practices are routine. There have been several instances reported in recent press coverage, of food

available in supermarkets that has been transported over many miles to be processed and packed, then returned to its place of origin to be sold as 'local'. In June 2007, for example, *The Guardian* newspaper reported the case of 'local' carrots grown in Wales on the farm of Patrick Holden (Director of the Soil Association).¹³ The carrots were marketed in Sainsbury's in bags that told the story of his family farm Bwlchwernen Fawr. However, the story of their journey from field to supermarket shelf was anything but local, and masked an alarming carbon footprint.

The carrots had to be sent to a Sainsbury's superpacker in East Anglia, trucking them 230 miles. We understand that the carrots were then returned via a regional distribution centre in another part of Wales, and then back to mid Wales to be sold as 'local'. As the *Guardian* commented, "By the end, his vegetables ended up with a larger carbon footprint than conventional carrots."

The newspaper researchers reported other examples of similar practices:

- Carrots bought at Waitrose carry a picture of Peter Cornish, one of its "carefully selected growers", on the back of the pack, but in small print on the front the carrots' country of origin was listed as Italy.
- A bag of parsnips with the story on the back of organic English parsnips grown by Andrew Nottage was sourced in Scotland.
- The story of watercress grown by the sparkling chalk streams of Hampshire accompanied a product imported from Portugal.

In September 2007, the *Daily Mail* also picked up on 'British' lamb shanks marketed under the Tesco *Finest* premium brand. Close inspection of the packaging revealed that the lamb was in fact from New Zealand.¹⁴

Is it really seasonal?

Research undertaken by Sustain and the National Consumer Council has uncovered many examples of 'seasonal' and related terms being used to market products that are in fact far from seasonal. In the following pages, we present many instances of confusing and misleading 'seasonal' marketing used by almost all of the leading supermarkets in the UK. Given that "eat seasonal food" is a mainstay of consumer advice for those who wish to do their bit to combat climate change, this situation is nothing short of alarming. It is little wonder, then, that 75 per cent of young people aged 18-24 do not know the seasons for classic British fruit and vegetables.¹⁵

In our surveys of supermarket products, magazines and websites, we found very few examples of seasonality being used accurately to market genuinely 'in season' produce.

1. Seasonality seems to mean: “available now... and from anywhere in the world”

Genuinely ‘in season’ food grows naturally at a particular time of year in the UK, and can be grown without energy-intensive conditions (such as heated greenhouses or chemical treatments), and can minimise storage times, refrigeration and food transport. Yet we have found lots of examples of energy-intensive and imported food being described as seasonal, on sale in the UK. Some illustrative examples are shown here.



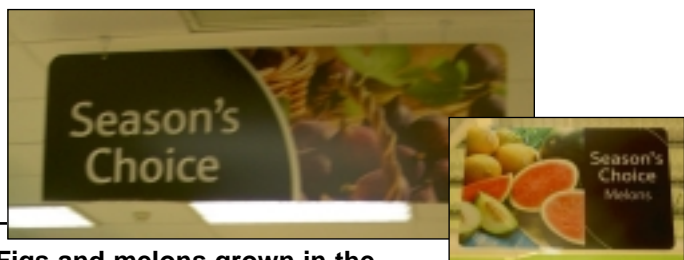
Seasonal long-life corn from New Zealand? Own-brand Spar Corn on the Cob: “Freshly harvested, succulent and tasty Sweet Corn” from New Zealand, labelled ‘New Season’, vacuum-packed, with a shelf-life of several months.

Bought in Spar Dartmouth, Devon, July 2006



Seasonal imported blueberries? Co-op promotion of Spanish blueberries described as ‘New Season’ with a sticker on the pack.

Found in Co-op Southampton, Hampshire, April 2007



Figs and melons grown in the UK? Tesco promotion of ‘Season’s Choice’ fruits, in the spring. UK produced in-season figs and melons?

Found in Tesco Islington, North London, Spring 2007



Seasonal Chilean fruit? An Asda trolley-marker reads: “Now in season: Puddles, wind, fresh plums and nectarines from Chile”.

Found in Asda Farnborough, April 2007



Seasonal long-distance apples? Own-brand Tesco promotion of New Zealand apples described as ‘New Season!’ with a sticker on the pack.

Found in Tesco Newcastle, April 2007



Seasonal papayas? Solo papayas and Greek Basil, described as ‘In Season’ in a Waitrose promotional booklet

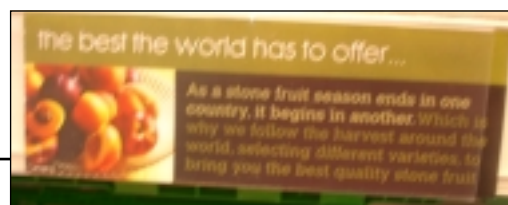
entitled ‘New In Season, Products, Ideas’.

Distributed by Waitrose nationally, April 2007

In 2006, the National Consumer Council ‘Greening Supermarkets’ survey looked for fresh vegetables available from the UK ‘in season’ at the time of the survey, but found: leeks from Kenya (Morrisons, Sainsbury’s and Somerfield); watercress from the USA (Sainsbury’s and Tesco); carrots from Egypt (Tesco); and – from South Africa – carrots (Morrisons and Waitrose); cabbage (Sainsbury’s) and leeks (Waitrose)

Seasonal spinach of 3 nationalities (and 2 continents) – on sale at the same time – UK (genuinely seasonal at the time of purchase), Spain and USA (so presumably airfreight).

Found in Sainsbury’s Islington, March 2006



A global never-ending season? A shelf tag promoted plums in Waitrose reads: “As a stone fruit season ends in one country, it begins in another. Which is why we follow the harvest around the world, selecting different varieties, to bring you the best quality stone fruit.”

Found in Waitrose Woking, Surrey, April 2007

2. Seasonality seems to mean: “new products”, not seasonal growing conditions

We found examples of seasonality used to promote new products, and whole displays, seeming simply to denote newness, not seasonal growing conditions.



Seasonal chocolate? Tesco promotion of chocolate Easter eggs: ‘Easter Treats’, labelled as ‘Seasonal’.

Found in Tesco Birmingham city centre, April 2007

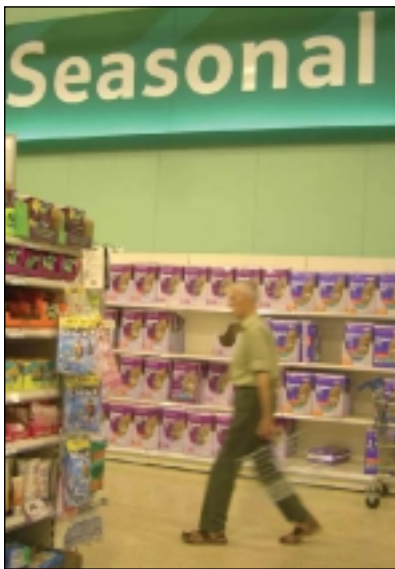
Seasonal winter fruit? An M&S range of ‘Seasonal Specials’ included “Freshly squeezed mandarin juice” in December.

Bought in M&S Central London, December 2006



Seasonal generic promotion. Asda promotion of generic ‘seasonal’ message above the bakery and cakes aisle with image of child eating chocolate cake.

Found in Asda, Devon, summer 2006



Seasonal reassurance? Tesco promotion of generic ‘seasonal’ message above a display of disposable nappies.

Found in Tesco, Devon, spring 2007

‘Season’s Best’ prompts new purchases. Melons, pomegranates, and berries (labelled as from Mexico, Chile and Spain) feature in the list of ‘summer fruits’, promoted as ‘Season’s Best’ in a *Get Fresh* promotional leaflet from Asda.

Distributed by Asda nationally, April 2007



New season equates to new products.

A Somerfield magazine promotes ‘New Season Peaches’ in a 5-a-day promotion; on the front cover of a Waitrose ‘In Season’ magazine, the highlights are French cheese and wine, and new organic beauty products.

Distributed in Somerfield and Waitrose nationally, April 2007

3. Seasonality can sometimes mean: “grown in unseasonal conditions”

It is rarely possible to find information about unseasonal production methods on the label. We found some examples of UK produce that could have been grown seasonally. But taking into consideration the time of purchase, they are very likely to have been grown in glasshouse conditions, possibly heated. We also found references in industry media to energy-intensive means of extending the UK season, such as polytunnel and glasshouse production and even heating the soil to encourage early asparagus. These methods seem to be wastefully using fossil fuels to extend the season *artificially*, to grow food OUT of season, potentially disguising energy-intensive choices as if they are an environmentally friendly choice.



Seasonally heated soil? The Co-operative Group, one of the biggest farmers in the UK, promotes ‘British New Season’ asparagus that has been encouraged to grow early with heated soil “stimulating a premature spring”.
Extract from *The Grocer* magazine, 29th March, 2007

Seasonal hothouse produce? In its ‘In Season’ promotional magazine, Waitrose lists nine types of British-grown speciality tomatoes as seasonal choices. Are they all grown in natural conditions without heating? Waitrose does not say.
Bought in M&S Islington, Spring 2007



Seasonal hothouse produce? M&S vine tomatoes available in the spring as ‘New Season’ – but are they grown in genuinely ‘seasonal’ conditions, or energy-intensive heated hothouses? The label does not say.
Bought in M&S Islington, Spring 2007



4. Seasonality can be used to mean: “this product smells fresh”



Seasonal marketing promotes household chemicals. Household products from air freshener to washing powder can also be promoted with seasonality marketing. Scented candles in Somerfield (left) and Sainsbury’s own-brand ‘Seasonal Scents: Tropical Summer’ washing powder are just two of the examples that we found.
Found in Somerfield Stamford Hill, North London; and Sainsbury’s Islington, North London, August 2007



5. And in general, seasonality simply gets mixed up with other marketing messages

In stores, we have rarely found seasonal produce differentiated from other produce either visually, or with special promotions. Indeed, our experience is that the seasonality message is mixed up with other marketing, giving consumers little incentive to choose genuinely seasonal produce. Marketers may choose to use seasonality because seasonal food is seen as positive, with an element of anticipation, of 'looking forward' to the arrival of seasonal produce. However, in practice, seasonality is also frequently presented as a generic and inaccurate message, promoting both seasonal and non-seasonal produce, confusing people still further.



Seasonal buns? Seasonal recipes are a regular feature in retailer and mainstream consumer magazines, but with slim connection genuinely 'in season' food. Waitrose's 'Seasons' magazine, for example, features buns and mangoes (as well as genuinely seasonal produce) in its spring 2007 edition.

Distributed by Waitrose nationally, April 2007

Spring flavour snacks? This Dole and Nestlé promotion appeared in a Somerfield in-store magazine, in which 'spring flavours' are "delicious parfaits, ice creams, cremes, cordials and milk-alternatives", including Nestlé Fruitcrunch biscuit snacks and Dole pineapple & coconut creme desserts.

Distributed by Somerfield nationally, May 2007



Summer juice? Robinsons 'Summer Fruits' dilutable long-life squash and Innocent 'Smoothie of the Month' orange and mandarin drink serve to remind us that new promotions mix up notions of seasonality with general marketing descriptions.

Available nationally, August 2007



Seasonal spinach, potatoes, radishes, mangoes, melon and avocado? Somerfield combines promotion of seasonal UK spinach with ideas for preparing mango and melon – all on a page marked 'In Season', in an editorial feature written by Somerfield's fruit and veg buyer. In another brochure, Somerfield links the the seasonal message to genuinely 'in season' UK potatoes and radishes, but also to imported avocados.

Distributed by Somerfield nationally, May 2007



Seasonal promotions? M&S 'Spring Offer' on Dominican Republic bananas, South African grapes and other non-UK non-seasonal produce.

Found in M&S Newcastle, April 2007

Is it really from a farmers' market?

A national household-name company – Heinz – has recently used the term 'farmers' market' in a £1.6 million television advertising campaign, to apply to produce that was neither local nor seasonal, and had not been sold direct to consumers by the farmers. This advertising campaign, and related advertisements in the trade press, are the subject of vigorous complaints to the Advertising Standards Authority (ASA) by Sustain and others. The ASA has told us they are pursuing the issue. For the definition of farmers' markets, showing the range of ethical and environmental values accredited Farmers' Markets seek to uphold, see Appendix IV.

Sustain is keen to see this sort of marketing 'nipped in the bud' to ensure the valuable term "farmers' market" – understood by increasing numbers of consumers as denoting fresh, local and seasonal produce – should not be devalued by application to inappropriate products and practices.

Sustain considers this to be a serious issue, since at least 10 years' worth of activities have been undertaken to build and promote support for genuine "farmers' market" produce in the UK – work sometimes funded by local authorities, publicly funded regional development agencies, communities, local food enthusiasts, charitable funds and local farmers themselves. There is a definition of a genuine "farmers' market" that embodies certain environmental, social and ethical principles and values, widely understood by the general public and practitioners, and adhered to by over 500 genuine "farmers' markets" in the UK.

In summary, genuine Farmers' Market produce would usually be:

- Locally grown and processed;
- Grown and processed by the farmer / processor themselves;
- Sold directly to the consumer by the principal producer;
- Labelled with details of production and locality criteria, or provided with such information.

For a full definition of a Farmers' Market, as defined by the National Farmers' Retail & Markets Association (FARMA), see Appendix IV.

Heinz "Farmers' Market" canned soups:

This new line of soups, from the canned goods manufacturer Heinz, was launched in 2007 with a £1.6 million television advertising campaign in October – the kind of marketing budget that local farmers and farmers' market organisers can only dream of. The range is called "Farmers' Market", although the label states that the product is only "inspired by farmers' markets", rather than sharing values of local or seasonal food, or being sold direct to consumers by the growers. Print advertising claimed that "*These great tasting, hearty soups are made using selected wholesome ingredients that you would find at a Farmers' Market,*" and TV ads for the soups showed livestock coming into the city to bring the countryside to people's kitchens. Sustain considers that this is a flagrant misuse of the term "farmers' market" which, we believe, attributes qualities to the ingredients that they do not deserve.



Eurostar “daily farmers’ market” and London & Continental Stations & Property (LCSP) “meet me at the farmers’ market” claims: In 2007, marketing for Eurostar’s new home at St Pancras International Station, North London, came with an added twist. The promoters boasted an “elegant world-class Brasserie”, “the magnificent 90-metre champagne bar” – and “a daily farmers’ market”. The “daily farmers’ market” promotion was sent by email by Eurostar to people who had travelled with Eurostar. The LCSP’s statement “Meet me at the farmers’ market” appeared in large print adverts on the London Underground, on lines linking to St Pancras International. Sustain has asked the Advertising Standards Authority to investigate these claims – since no fresh produce market is yet in operation at St Pancras International, and it is not yet clear whether such a daily market will serve only local and seasonal food sold directly to customers by the farmers, as would be the case if this were a genuine farmers’ market.

Conclusion

This survey report shows that we stand in real danger of descriptions such as ‘local’, ‘seasonal’ and ‘farmers’ market’ losing their value, and consumers losing their trust in ethical and environmental messages associated with food. This is likely to greatly reduce their ability to make better choices, undermining efforts to combat climate change and other environmental damage, and to support better incomes for farmers.

References

1. Food transport accounted for an estimated 30 billion vehicle kilometres (a unit of measure representing the movement of any transport vehicle over one kilometre) in 2002, of which 82% are in the UK.
2. Food transport produced 19 million tonnes of carbon dioxide in 2002, of which 10 million tonnes were emitted in the UK, almost all from road transport. This figure represents 1.8% of the total annual UK carbon dioxide emissions and 8.7% of the total emissions from UK road use.
3. Institute of Grocery Distribution, *Retail and Foodservice Opportunities for Local Food*, March 2006
4. Mintel, *Ethnic Restaurants and Takeaways – UK*, 2006
5. Institute of Grocery Distribution, *Retail and Foodservice Opportunities for Local Food*, March 2006
6. NCC (2006) *Seasons' Promise: An enjoyable way to tackle climate change*; Sue Dibb, Joanna Collins, Ed Mayo, see: www.ncc.org.uk/nccpdf/poldocs/NCC133_seasons_promise.pdf
7. For organisations that work with food co-ops throughout the UK, see: www.foodlinks-uk.org/FlukMemList.asp - also the Making Local Food Work programme at: www.makinglocalfoodwork.co.uk
8. For more information on these and other assurance schemes, see the Further Information section, Appendix V.
9. Assured Produce (AP) is a part of Assured Food Standards (AFS) for the production of fruit, salads, herbs and vegetables. See here for information on the scheme and its logo, see: www.assuredproduce.co.uk.
10. Geraldine Padbury, *Retail and Foodservice Opportunities for Local Food*, Institute of Grocery Distribution, 2006
11. Geraldine Padbury, *as above*
12. e.g. Devon County Council Trading Standards Service enquiry to Natural England, 15 March 2007
13. *Guardian* (June 26, 2007) *Sainsbury's giant carrot washer, and the rejected royal roots*, by Felicity Lawrence
14. *Daily Mail* (2007) *Banned: Tesco's 'British' lamb that really comes from ... New Zealand* (September 27, 2007)
15. National Consumer Council research, 2006, referred to in NCC (2006) *Seasons' Promise: An enjoyable way to tackle climate change*; Sue Dibb, Joanna Collins, Ed Mayo, see: www.ncc.org.uk/nccpdf/poldocs/NCC133_seasons_promise.pdf

Principles of sustainable food

Food sustainability is about more than just local and seasonal food bought from outlets such as farmers' markets. We have summarised our top tips for sustainable food in seven principles of sustainable food. In our opinion, people and businesses adopting a sustainable approach to food should:

1. **Buy local, seasonally available ingredients as standard**, to minimise energy used in food production, transport and storage. To see which foods are in season, see, for example: www.eattheseasons.co.uk.
2. **Buy food from farming systems that minimise harm to the environment**, such as certified organic produce. For information about organic certification, see the website of the UK's largest organic certification body, the Soil Association: www.soilassociation.org.
3. **Reduce the amount of foods of animal origin eaten** (meat, dairy products and eggs), as livestock farming is one of the most significant contributors to climate change, and **eat meals rich in fruit, vegetables, pulses, wholegrains and nuts**. Ensure that meat, dairy products and eggs are produced to **high environmental and animal welfare standards**. See the website of Compassion in World Farming's Eat Less Meat campaign: www.eatlessmeat.org for more information.
4. **Stop buying fish species identified as most 'at risk' by the Marine Conservation Society** www.fishonline.org/advice/avoid, and **buy fish only from sustainable sources** – such as those accredited by the Marine Stewardship Council, www.msc.org.
5. **Choose Fairtrade-certified products** for foods and drinks imported from poorer countries, to ensure a fair deal for disadvantaged producers. For information about Fairtrade products, see: www.fairtrade.org.uk.
6. **Avoid bottled water** and instead drink plain or filtered tap water, to minimise transport and packaging waste. For information about the environmental problems associated with bottled water, see Sustain's report: *Have you bottled it? How drinking tap water can help save you and the planet*: www.sustainweb.org/page.php?id=137.
7. **Protect your and your family's health and well-being** by making sure meals are made up of generous portions of vegetables, fruit and starchy staples like wholegrains, cutting down on salt, fats and oils, and cutting out artificial additives. The Food Standards Agency (www.eatwell.gov.uk/) has a wealth of advice.

You can find out more about Sustainable Food on the Sustain website at: www.sustainweb.org, and more details of the reasons behind the sustainable food principles listed above at: www.sustainweb.org/sustainablefood.

Defining “local”

Consultation with Sustain’s members and others who use a workable definition of locality and other provenance-related terms shows that there is a good deal of commonality of intent and meaning used by different organisations seeking to promote sustainable food systems.

The FSA's own research has found that a majority of consumers want official guidance and verification on the use of the term.¹ Trading standards officers have also requested guidance on the use of the term.²

As noted in a discussion paper entitled “Use of the term ‘local’ in food marketing” (May 2007, by James Petts), “The most widely accepted definition of local food by a number of voluntary bodies is: *‘Food produced, processed and traded, from sustainable production systems where the physical and economic activity is controlled within the locality where it was produced, which delivers health, economic, environmental and social benefits to the people in those areas’*.”

Criteria should apply to the term "local" and combinations of the term and associated descriptions, including "local food", "locally grown", "locally produced". Criteria should also be applicable for food sold under brand names, such as "Local Harvest", "Local Choice", "Locally Produced".

In keeping with the farmers’ market definition (see below), the term(s) should not be used if the food is processed, transported, or packed outside of the defined area. The term "produced", when used for primary produce, should therefore mean the entire process from primary production to transport to the retail outlet. That is, the product is grown/reared, harvested/slaughtered, processed (e.g. washing, pasteurisation), packed/packaged, and transported/distributed within the defined area.

The following interpretations can apply:

For most areas, for primary produce, either:

- Produced at a distance of no greater than 30 miles from the point of sale, and/or;
- Produced in the county or Joint Character Area (JCA) (e.g. Cheshire, the Cotswolds, Dartmoor) at the point of sale.

For large towns and smaller cities (population >200,000), either:

- Produced at a distance of no greater than 50 miles from the point of sale, and/or;

- Produced in the county/ies or JCA/s within 20 miles of the town/city boundary.

For major cities and metropolitan areas, for primary produce, either:

- Produced at a distance of no greater than 70 miles from the point of sale, and/or;
- Produced in a county or JCA within 50 miles of the metropolitan boundary (e.g. for London this would be from a county within 50 miles of the Greater London Authority boundary).

For manufactured and heavily processed products, the entire manufacturing process of the final product should take place within the defined area, as above.

For manufactured and heavily processed products, where the food and/or ingredients have undergone a substantive change, either:

- At least 50% by weight of the ingredients fulfil the criteria for 'local' primary produce (as above);
- Or that the characterising ingredient/s (e.g. strawberries in strawberry jam) fulfil the criteria for 'local' primary produce (as above).

References

1. COI Communications, *Local Food Omnibus Research*, for the Food Standards Agency, January 2007
2. Devon County Council Trading Standards Service enquiry to Natural England, 15 March 2007

Defining “seasonal”

This refers especially to fresh produce (mainly fruits and vegetables, but also meat and fish), which are available from local farmers only at certain times of the year. The concept links time of year, and geographical location, as the Department for Environment, Food and Rural Affairs (Defra) has agreed in its recent work promoting sustainable consumption. Seasonality should mean that produce is minimally stored, refrigerated or treated with post-harvest treatments, and not grown using unnecessary energy inputs such as heated greenhouses, polytunnels or heated soil.

Specifically, seasonality descriptions should only be used to market food that is grown and sold:

- During the traditional and natural growing and harvesting periods of the food;
- For a limited period after harvest when produce has been stored in non-refrigerated or minimally refrigerated conditions, especially where energy for that refrigeration is provided from 100% renewable sources;
- Limited periods when non-heated types of protection are used (e.g. glasshouses, polytunnels, fleece, etc), with the possible exception of protected cropping heated by 100% renewable energy or carbon-efficient Combined Heat and Power.

And seasonality descriptions should not be used for produce grown in glasshouses heated with non-renewable fossil fuels, stored in refrigerated facilities that are not powered by 100% renewable energy, or for heavily processed and manufactured products.

In Defra’s Public Sector Food Procurement Initiative, working with caterers in the public sector (such as in schools, hospitals and care homes) to improve their sustainability, and among progressive food manufacturers and retailers interested in environmental issues, it is common for caterers and buyers to make reference to an authoritative source of seasonality information such as:

- <http://southeastenglandfoodanddrink.co.uk/display.aspx?id=46>
- <http://www.eattheseasons.co.uk/>
- <http://www.rivercottage.net/>
- http://www.bbc.co.uk/food/in_season/

Sustain suggests that a common source of authoritative information may be needed to help food professionals make informed decisions about their marketing practices in relation to seasonality – another area in which the Food Standards Agency could take the lead.

Defining “farmers’ market”

The following are criteria for Farmers’ Market produce and producers from the website of the National Farmers’ Retail & Markets Association (FARMA). See: www.farmersmarkets.net/certification1.htm and [.../certification2.htm](http://www.farmersmarkets.net/certification2.htm)

Guidance Criteria

The criteria for farmers’ markets was initially established by the first in the UK – Bath, opened in September 1997; these criteria now form the basis of FARMA recommendations to all new farmers’ markets starting up and are an essential requirement for farmers’ markets that wish to become members. In consultation with FARMA some interpretation is flexible to allow for geographic and production variations throughout the UK.

Where a market fulfils the criteria, the National Farmers’ Retail & Markets Association will recognise the market as a farmers’ market. More tightly defined criteria may be applied to fit local circumstances where this strengthens the philosophy behind farmers’ markets. These criteria have been kept as brief as possible. While they must be followed closely, not all circumstances have been provided for and exceptions will be considered where a case can be made. Each exception must be agreed by FARMA.

Interpretation of the criteria will be at the discretion of the market applying these guidance notes. FARMA will assist with any local disputes where a producer considers she or he has been unfairly excluded or that other producers have been allowed, by the market, to flout the Criteria.

- **Locally produced:** Only produce from the defined area shall be eligible for sale at a farmers market. Producers from the area defined as local must be given preference. (See guidance on interpretation below for allowable variations)
- **Principal producer:** The principal producer, a representative directly involved in the production process or a close family member must attend the stall.
- **Primary, own produce:** All produce sold must be grown, reared, caught by the stall holder within the defined local area.
- **Secondary, own produce:** All produce must be brewed, pickled, baked, smoked or processed by the stall holder using at least one ingredient grown or reared within the defined local area. The base product should be substantially altered.
- **Policy and information:** Information should be available to customers at each market about the rules of the market and the production methods of the goods on offer. The market should also publicise the availability of this information.
- **Other rules:** Markets may establish other criteria in addition to the above provided they do not conflict with the core criteria.

FARMA's Guidance Notes on the interpretation of the Criteria

1. Locally produced

To reach FARMA standards, your market must define an area as local from within which the majority of your producers will travel to sell at you market. The area that you define as local is important for public perception of 'local food'.

There are two types of local definition that FARMA recognises:

- Local as a radius (Local is defined as a radius from the market. A definition of 30 miles is ideal, up to 50 miles is acceptable for larger cities and coastal or remote towns and villages).
- Local as a county boundary.

The definition of local may also be a county boundary or other geographic boundary such as a National park that is similar in size to the radius option.

- Difficult to source produce: Producers from further afield may attend the market if there is no suitable local producer of a given product. Markets that accept producers from beyond their definition of local should include a clause that states "preference will be given to the most local producer when a space becomes available at the market, without compromising quality".
- Maximum distance: If producers from beyond the area you define as local are permitted to attend your market/s it is recommended that a maximum distance of 100 miles of the market is stated.

2. Principal producer

The stall should be operated by someone directly involved in production, not just in other aspects of the producer's business. One of the key principles of a farmers' market is for the consumer to have a direct relationship with the producer. Community associations such as local allotment societies or Country Market groups may be agreed as principal producers on a case by case basis by the local market. In all cases they must be bone fide producers; if in doubt contact the FARMA office.

3. Primary, own produce

Primary produce will have been grown or reared on the producer's land, for livestock and plants this means grown or finished (having spent at least 50% to its life) on the producer's land. Preference should be given to the largest percentage of a product's life cycle spent on the producer's land. Game shot or caught within the defined local area may be sold at farmers markets by the person rearing or licensed to hunt the game. Fish at a farmers' market, ideally, should be sold by the fisherman. A representative of a number of known local boats may attend the market so long as the fishing grounds are known local, inshore waters and a link to the fishing business/es can be proven.

4. Secondary, own produce

Anyone processing produce or adding value is a secondary producer. For processed products the base product should be substantially altered and they must contain as much local ingredient as possible – this means grown or reared within the area the market defines as local. Receipts should be kept as proof of origin for inspection by the market manager and Trading Standards when requested; producers growing their own should be prepared to be visited by an appointed representative from the market management.

Processors, who want to benefit from the success of farmers' markets, which is partly built on the localness of the food on offer, should be prepared to abide by similar principles.

5. Policy and information

A farmers' market should be clearly labelled as such and separate from any other retail operation especially other market stalls that will confuse customers' perception of what a farmers' market is. Each farmers' market should be operated in accordance with Trading Standards, Environmental Health, alcohol licensing, market charters and other relevant legislation.

The policy of each farmers' market in terms of sourcing locally produced food and encouraging sustainable methods of production should be available to customers. Producers must produce clear written information about production methods which shall be available to any consumer who requests it. The market must also publicise the availability of this information.

Markets should, for the time being, include a policy that no genetically modified organisms are knowingly sold or included in products sold at the market. Markets may establish other standards which they feel are appropriate, e.g. restricting the use of ingredients perceived as undesirable by consumers, compliance with minimum animal welfare standards.

6. Other criteria

Markets may set other rules which do not conflict with the main principles set out in the criteria. The prime aim of the market must be to develop a vibrant environment where consumers and producers are brought together and the farmers' markets principles are promoted and upheld. Example rules are available from the FARMA office. These policies will be kept under review and may be altered to take account of changing circumstances. If you have comments or views about these criteria please contact FARMA.

FARMA states that policies will be kept under review and may be altered to take account of changing circumstances. For comments or views, email: justask@farma.org.uk

Links to further information

For further information about seasonality

- There are now many ways to find out when certain varieties of fruit, vegetables, fish and meat are in season:
- On the web, seasonality information can be found at, e.g.:
 - <http://southeastenglandfoodanddrink.co.uk/display.aspx?id=4>
 - www.eattheseasons.co.uk
 - www.rivercottage.net
 - www.bbc.co.uk/food/in_season/
- To find local and regional food producers:
 - Contact a local Food Links organisation – see www.foodlinks-uk.org/FlukMemList.asp for a list of Food Links groups.
 - If you're in London or the surrounding counties, use London Food Link's Local Food Finder: www.localfoodfinder.org.
- To find local producers' markets in your area, contact:
 - London Farmers' Markets: www.lfm.org.uk
 - FARMA: ww.farma.org.uk

For further information about environmentally friendly farming

- For information about organic certification and the rules covering organic production, contact one of the UK's officially recognised certification organisations: Organic Farmers and Growers Ltd; Scottish Organic Producers Association; Organic Food Federation; Soil Association (www.soilassociation.org/certification); Bio-Dynamic Agricultural Association; Irish Organic Farmers and Growers Association; Organic Trust Limited; CMi Certification; Quality Welsh Food Certification; Ascisco. For details, see: www.defra.gov.uk/farm/organic/standards/certbodies/approved.htm.
- For details of the LEAF-Marque, see www.leafuk.org/leaf/.
- For details of the Red Tractor logo and assurance schemes associated with it see: www.redtractor.org.uk/site/rt_home.php.

For further information about eating less meat

For background reading, take a look at the following websites which give more information about this important subject:

- For more information about farm animal welfare, see the Compassion in World Farming (CIWF) website: www.ciwf.org.
- For reasons to reduce meat consumption, see the website of the CIWF's Eat Less Meat campaign: www.eatlessmeat.org.
- To see details of the United Nations research into meat production and the environment, 'Livestock's Long Shadow', visit: www.fao.org/docrep/010/a0701e/a0701e00.htm.
- A new report from the Food Climate Research Network explores the livestock sector's contribution to the UK's greenhouse gas emissions and assesses what less greenhouse gas intensive systems of production and consumption might look like. See: www.fcrn.org.uk/frcnresearch/publications/PDFs/TG%20FCRN%20livestock%20final%206%20Nov%20.pdf

For further information about sustainable fish

- For details about the problems associated with overfishing, trawling and aquaculture, see:
 - Greenpeace's 'Defending Our Oceans' campaign: <http://oceans.greenpeace.org/en/our-oceans>
 - The WorldWide Fund (WWF) for Nature's marine programme: www.wwf.org.uk/researcher/issues/livingseas/0000000020.asp
 - The Environmental Justice Foundation's campaigns and reports on bycatch, pirate fishing and prawn (shrimp) aquaculture: www.ejfoundation.org.
 - Sustain's report, "Like Shooting Fish in a Barrel: the collapse of world fisheries in the 21st century and what we can do to prevent it happening": www.sustainweb.org/publications/info/143/.
 - Forum for the Future's report 'Fishing for Good', see: www.forumforthefuture.org.uk/docs/publications/217/fishgood.pdf.
- Contact the Marine Stewardship Council for details of suppliers of MSC-certified fish: www.msc.org.
- For the Marine Conservation Society's lists of 'fish to eat' and 'fish to avoid' see www.fishonline.org.
- Contact Seafood Choices Alliance (www.seafoodchoices.com) on 020 7811 3347 for details of the forthcoming Seafood Sourcing Directory: 50 of Britain's top seafood species & their sustainability.

For further information about Fairtrade

- Details of Fairtrade products and standards are on the websites of the Fairtrade Foundation (www.fairtrade.org.uk) and the international Fairtrade Labelling Organisations (www.fairtrade.net).
- For information about local Fairtrade Town campaigns, see www.fairtrade.org.uk/get_involved_fairtrade_towns.htm.
- For the Fairtrade Foundation's 'Fairtrade at work' campaign to switch workplaces to Fairtrade tea, coffee and other products, see www.fairtradeatwork.org.uk/index.html.

For further information about avoiding bottled water

- Download Sustain's publication, *Have you bottled it? How drinking tap water can help save you and the planet* – www.sustainweb.org/page.php?id=137.
- If you have any concerns about the health and safety aspects of serving tap water, these can be allayed by the Chartered Institute of Environmental Health, an independent organisation representing environmental health officers, whose own policy is to provide tap water for meetings and events – www.cieh.org.
- To communicate your views about your local water company, contact the Consumer Council for Water on www.ccwater.org.uk.
- For details of reducing waste in general, including that from water bottles, see Waste Online at www.wasteonline.org.uk/.
- For information about the water industry and its standards, contact Water UK at www.water.org.uk.

For further information about nutrition

- Plenty of information about healthy eating for consumers is on the Food Standards Agency website: www.eatwell.gov.uk.
- Information, guidance and tips galore are available on the government salt campaign site www.salt.gov.uk.
- *The Food Magazine*: [/www.foodcomm.org.uk](http://www.foodcomm.org.uk) regularly exposes excessive use of additives in products, alongside misleading labelling and marketing. See also their new additives site: www.actiononadditives.com – which focuses on artificial colours and preservatives proven to have a detrimental effect on young children's mood and behaviour.

You've got better food, now...

Sustainability is not just about the food you eat. Three areas of special concern are: waste, energy and water. Whilst Sustain does not specialise in advice on these important aspects of the food system, we mention them here because they play an important part in the overall sustainability of our food and farming systems.

For further information about saving waste, water and energy

- Waterwise specialises in providing information about saving water – www.waterwise.org.uk.
- UK food waste information is available the Waste Reduction Action Programme (WRAP), at: www.lovefoodhatewaste.com.
- Information about composting can be found at www.lovefoodhatewaste.com and information about worm bins can be found at: www.wigglywiggers.co.uk.
- Energy saving tips are offered by the Energy Savings Trust, see: www.energysavingtrust.org.uk/what_can_i_do_today/cheap_and_simple_tips.
- Tips on saving water are offered by the Water Guide, see: www.water-guide.org.uk/tips.html.



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To find out more about Sustain's work, and our members, visit: www.sustainweb.org

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