

SUSTAIN RESPONSE TO THE CONSULTATION DOCUMENT ON PUTTING CONSUMERS FIRST: THE FOOD STANDARDS AGENCY DRAFT STRATEGIC PLAN 2005-2010

THE STATUS OF THIS RESPONSE

Sustain: The alliance for better food and farming advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the living and working environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level (listed on our website www.sustainweb.org).

Many of the proposals in this submission have already been made, in one form or another, individually or collectively by organisations in our membership. However, it has been agreed that Sustain should prepare a response to the consultation that would integrate these proposals into a single document, and add new or updated suggestions as appropriate. References are available for all the studies cited.

A process of obtaining contributions and endorsements from Sustain's membership has been undertaken and, at the end of this document, is a list of those who wish, explicitly, to endorse its general principles and recommendations in those areas where they have expertise.

GENERAL PRINCIPLES

The Food Standards Agency strategic plan should incorporate sustainable development, by which we mean, in Brundtland's definition¹, the capacity to provide for the needs of the current generation without compromising the ability to provide adequately for future generations. This holistic approach encompasses social and economic goals alongside environmental imperatives, as outlined below.

- ❖ Health, by which we mean, using the World Health Organisation's definition², physical and mental well-being, not merely the absence of disease, both for humans and animals. For food policy this means:
 - food uncontaminated by microbiological poisons, toxic residues or other harmful substances;
 - food that does not compromise our resistance to infection, or render ineffective medical treatments;
 - a food supply that is micronutrient-dense, fibre-rich and provides essential fats to reduce the risks of developing cardiovascular diseases, some cancers and other diet-related illnesses. This largely comprises a variety of whole-grain cereals and other starchy staples, plentiful and varied vegetables and fruit, diverse pulses, nuts and seeds, some dairy produce and, for non-vegetarians, occasional fish and meat;
 - access to the best quality food (as outlined above) for the most vulnerable in society, particularly low income groups and, especially, babies and children, elderly people, and those who are ill.

¹World Commission on Environment and Development, *Our Common Future*, 1987. Oxford University Press.

² *Health21 – Health for All in the 21st Century*, 1999, World Health Organisation Regional Office for Europe

- ❖ Environmental quality:
 - clean air and water to support human, animal and plant life;
 - rich natural habitats (both land and water-based) that will support abundant and diverse wildlife;
 - natural genetic diversity in farmed plants and animals, to reduce vulnerability to diseases, preserve our heritage and enrich our diets;
 - high animal welfare standards, to preserve their, and our dignity and improve animals' resistance to diseases, some of which are zoonotic;
 - careful husbandry of non-renewable natural resources, including the soil, to reduce waste and pollution, and allow time to switch to renewable alternatives.
- ❖ Livelihoods:
 - jobs in the farming and food sector, whether private or public, that provide a living wage;
 - working conditions that do not endanger health or well-being;
 - on and/or off-the-job training that offers opportunities for personal development and acquiring flexible skills;
 - adequate state benefits for those who are unable to obtain paid employment.

Underpinning what citizens expect of sustainable development are the following rights and responsibilities:

- to receive adequate food knowledge and skills from the education system, and to use these to make choices that will optimise sustainable development;
- to be thoroughly protected from information about farming and food which is dishonest, illegal and untrue;
- to have a choice of ways to obtain food, and to use these choices to retain diversity;
- to have democratic control over decisions that will affect the farming and food sector, and to take the opportunities offered to participate in these decisions.

In providing this for UK citizens, the food and farming sector should, at worst, not undermine the provision of the same for other countries and, at best, contribute to achieving these goals for other countries, particularly for the poorest.

SUSTAIN'S RESPONSE TO THE QUESTIONS POSED

1. *We think that our priority areas for the next 5 years should be Food Safety (food borne illness and chemical contamination), Eating for Health and Choice. Do you agree?*

Sustain agrees that, having made good progress with improving food safety, it makes good sense to continue to build on those achievements and retain food safety as one of the Agency's priorities. We also agree with the Agency's analysis of the significance of diet-related diseases and, although we regret that this was not made a priority earlier in the FSA's existence, we very much welcome the fact that it is now a priority issue. However, the third plank of the FSA's priorities should, we believe, be sustainable development, as is clear from our statement of general principles above.

This is not necessarily incompatible with "choice". The Agency's remit already covers "protecting the interests of consumers in relation to food" and people are clearly interested in a range of food-related sustainable development issues. This interest is manifest in citizens' buying habits e.g. in sales of organic food, ethically traded products, and food produced to high animal welfare standards, and is also shown in countless opinion polls and surveys. At

minimum the FSA should provide substantial information on these issues and make sure that labels claiming one or more attributes of sustainable development are accurate and not misleading.

In addition, the FSA might undertake a literature review of sustainable development and food, similar to that undertaken for assessing the evidence on the effect of food promotion on children's diets. Such a review might assess the impact of the food system on climate change, energy use, waste, and so forth. The review should link environmental issues to food safety and nutrition: what, for example, is the impact of intensive horticulture on nutrient levels in fruit and vegetables, as well as on soil and water quality (which, in turn, can affect health); and what impact has intensive livestock production had on the incidence of zoonoses, as well as on air and water pollution?

Other issues that the FSA might cover, and how sustainable development might be fully integrated into the Agency's work is covered in more detail under question 5. However, it is clear to us that "embedding sustainability" – to use the draft strategy's own words – is most unlikely to occur unless it becomes one of the FSA's priorities, alongside food safety and diet and health, with its own set of targets and deadlines.

2. *How appropriate and how achievable do you think that the proposed targets are? It would help if you could make it clear which specific target(s) your comments relate to and explain briefly your reasoning.*

Sustain **broadly agrees with the food safety targets set out on pages 16, 17 and 18** of the draft strategic plan, as far as they go. However, it is not clear to us why E.Coli 0157 is not included in the targets, particularly when the Chief Medical Officer specifically requested that the FSA reduce food poisoning from this source in his annual report published in December 2001. More fundamentally, it is not obvious that a "pathogen by pathogen" approach is the best way to proceed. It is possible, for example, that reducing the incidence of one pathogen simply creates space for the proliferation of another. An integrated approach, which seeks to **reduce the presence of all known pathogens by tackling the systems that give rise to them**, might be more successful in the longer term. Further research might shed some valuable light on this issue.

Similarly, **research seems to be lacking on human resistance to food borne illnesses**. While no-one would argue in favour of contaminated food, the prospect of sterile food is also unappealing and likely to lead to too low an exposure to beneficial organisms that can boost humans' immune systems.

On chemical contamination, it is not clear why there are few targets and deadlines for reducing contamination from agrichemical residues. We **welcome** the development of the **FSA's action plan to minimise pesticide residues in food, and the inclusion of two targets (on page 24)** in this area. It is particularly welcome that the FSA is planning to explore the issue of labelling of post-harvest pesticides, though it is **not clear** why it should take until 2006 simply to assess consumer demand for such labelling, nor **why it should focus solely on post-harvest pesticides**. The FSA has already acknowledged that buying organic food is a good way for people to avoid pesticide residues overall, and this should surely be incorporated explicitly into this area of work. Moreover, the FSA needs to explain why it believes its planned guidance on minimising pesticide residues in food will be any more successful than existing voluntary guidance already available from a number of sources. In

the absence of evidence showing the effectiveness of voluntary measures, compulsory approaches are unquestionably overdue.

We would also **strongly suggest** that the FSA augment its targets on pesticides with **targets to reduce other agrichemical residues, particularly antibiotics**. Given the seriousness of antibiotic resistance in humans, we are very disappointed at the reaction of the FSA Board, at its 13 May meeting, to the Soil Association's report showing a range of antibiotic residues in eggs and chicken livers. The Board considered that there was no immediate health risk, but it is, of course, the longer term health risks of such residues, particularly the development of antibiotic resistance, that the Agency should be tackling.

Finally, in the area of food safety, it is disappointing that there is only one reference in the draft plan to food allergies, and none at all to other adverse reactions to food and food ingredients, particularly additives. While the **target on page 24 on developing labelling to help those with allergies** to nuts and sesame seeds **is welcome**, the FSA should **also take action on a much wider range of foods and ingredients that can cause allergic or intolerance reactions**. In addition, the FSA has not pursued, with any vigour, the implications of its own research showing that some additives cause behaviour problems in some children. This research confirms the findings of many other studies and it would seem a valid use of the precautionary principle to **set a target to reduce the level of additives in food** that can cause adverse reactions, particularly in food and drinks commonly consumed by children.

We have some problems with the targets outlined on pages 21 and 22 in the *Eating for Health* section. Specifically, we consider that the **draft targets on salt, saturated fat, and energy balance are too modest, incomplete and inappropriately focused on nutrients rather than food**. These targets have existed for several years and, even when they were set, were the result of a compromise between what was ideal and what was thought politically possible at the time. Adult salt intakes should ideally, for example, be well below 6g, and many international experts now recommend that the upper limit for saturated fat should be 10% or less of dietary energy.

The Agency is fully aware, of course, that there is more to a healthy diet than reducing salt and saturated fat. Other important factors include total fat, other types of fat we should eat less of (including trans fats), types of fat we should eat more of (such as omega 3 fats), sugar, fibre and a wide range of vitamins, minerals and other micronutrients. It seems anomalous that the FSA has set targets for only two elements of the diet, and aims to set a target for energy balance by 2006 which, given the current obesity crisis, seems unduly leisurely.

Setting **partial nutrient targets not only lacks ambition, but could also have perverse effects**. It is quite possible, for example, to imagine that levels of saturated fat could be reduced, but total fat levels would remain unchanged. Some research has also indicated that total fat reductions may, in the absence of other measures, lead to increases in the proportion of sugar in the diet.

While we would argue for a more comprehensive approach to setting aspirational nutrient targets, Sustain also proposes these be augmented by targets related to specific categories of food and drink, since it is real products, not abstract nutrients, that people consume. Government has had no difficulty with this approach *vis a vis* fruit and vegetables, since encouraging people to eat at least five portions each day is a message to eat more.

However, governments throughout the world have been exceedingly nervous about making recommendations to eat less of particular types of product, for fear of offending those industries that produce them. This is inconsistent and unhelpful in terms of helping people attain healthy diets. We explore some examples of product categories that should have targets in our answer to question four below.

In terms of influencing supply, **we are concerned that the FSA proposes to take until 2006 to establish salt reduction targets** for the 10 food categories contributing most salt to the diet. We had understood that this work was already well underway and it is not clear why it cannot be completed in 2004. We **welcome the proposal to establish surveys of the nutritional quality of meals in major institutions** and to set targets, but would reiterate that these should be comprehensive, and not focus solely on a small number of macronutrients.

As for empowering citizens to change their diets, **we welcome the Agency's programme of "name and shame" surveys** but would urge that the range of nutrients covered be extended, in line with our comments above. We would also recommend that the FSA **repeat earlier surveys on a regular basis** (perhaps biennially) to assess what progress, if any, is being made. If occasional adverse publicity proves to be insufficient to persuade manufacturers to improve product composition, other measures will probably need to be considered.

We also **welcome** the Agency's new programme of work to develop robust definitions of good and bad foods, as the basis for **developing a simplified food labelling system** – currently being referred to as the "traffic light" system (though we realise it may emerge in a different form). However, the 2006 target for this system seems to be later than the 2005 target in the FSA consultation on promotion of food to children. It may be that the FSA is planning to go beyond 'children' to all foods - in which case a 2006 target may be justified - but we would welcome some clarification. Moreover, we would **urge the FSA to take an integrated approach**, since it is unlikely to be helpful to citizens if food labels carry, say, a "green" light for nutrition, but contain additives or ingredients that cause an adverse reaction in their children.

Regarding disadvantaged and vulnerable people, we are very disappointed that there is no target date for developing a strategy in this area, following the FSA's welcome recent consultation exercise on this issue. It is also disturbing that the Agency feels it appropriate to work only with local authorities on the Food Vision initiative, and not with those in the voluntary sector, and in health and other professions who in fact create and maintain much of the good practice to which the draft plan refers. We would therefore **urge you to be more inclusive in your approach**. We understand that the Welsh Food and Wellbeing strategy, produced by the Welsh Assembly Government and Food Standards Agency Wales, and the Cardiff Food Strategy (soon to be presented to the Local Health Board) are examples of good Practice in this regard.

While we **welcome the FSA's endorsement of a "whole school" approach** to food and health, it is **not clear how this is going to be achieved or by when**, and this should be rectified. The provisions in Sustain's proposed Children's Food Bill (see below) tackle this issue in detail. The Institute of Consumer Sciences is among many organisations that would like food to be made a more central and holistic focus of study throughout the primary and secondary curricula.

Finally, in this *Eating for Health* section, **the Agency's proposals on promoting food to children are entirely inadequate.** Sustain's Children's Food Bill campaign has responded separately, and in detail, to the FSA's consultation exercise on this issue. In summary, however, 115 national organisations (at time of writing) consider it essential to provide legal protection to children from junk food marketing in all its forms. They also consider that legislation should improve the quality of food provided in schools (at mealtimes and throughout the school), and enhance the provision of food education and skills.

The labelling targets in the section on Choice on "use by" information, origin declarations, terms such as "fresh", GM information, nut allergy, assurance schemes, and post-harvest pesticides are welcome. However, as with other parts of the draft strategic plan, there is a **lack of coherence and ambition.** These are not the only labelling issues that concern consumers and it is not clear how these areas have been chosen. Other labelling issues include those raised by vegetarians, vegans, people with dietary requirements linked to their religion, and citizens who wish to link a range of ethical concerns to their food choices. Moreover, these and other labelling issues have been problematic for some time and it is not obvious that further surveys and guidance will be any more successful at improving standards than they have been in the past. The Agency's efforts could usefully focus on **improving enforcement of food labelling laws**, including by financially supporting legal test cases and exploring how additional food law enforcement officers could be employed.

Similarly, **using food law enforcement to stamp out food fraud would seem more appropriate than the proposed target to assess and monitor it.** In the light of this comment, 2007 is surely too late to review the cost-effectiveness of the Agency's "fighting fund" in this area.

3. *Some of the targets that we have set are aspirational and we need to do a lot of work to map out how to achieve them. Do you agree with the principle of setting aspirational targets even though this increases the risk that we may not achieve all of them?*

As is clear from Sustain's answers to the other questions posed by the FSA, we agree wholeheartedly with the principle of setting aspirational targets. Although this does indeed increase the risk of failure, the alternative – setting targets that are easier to reach – seems unambitious and hardly worth the effort of setting them. In addition, we would also suggest the FSA review the targets- at minimum around the middle of the five year period in, say, 2007 - to ensure that they are still suitable and to add and/or strengthen targets as appropriate.

4. *The draft strategic plan contains an interim position on sustainability. The Board will be considering this area in more detail later in 2004. The present consultation is one route through which we are inviting stakeholder comments ahead of the Board's discussions. What issues should the Agency be tackling in this area, bearing in mind that the means by which food is produced is not within the Agency's remit unless it affects safety or public health.*

Sustain's interpretation of sustainable development, as it applies to food and farming policy, is set out on the first two pages of this response. While not claiming this is in any way definitive, the FSA's "guiding principles" of sustainable development listed on page 27 of the draft plan bear almost no resemblance to the principles of sustainable development widely understood elsewhere in government or, indeed, in society as a whole. We recommend the FSA re-examine these as a matter of urgency.

A study published in 1999 by the Swedish Environmental Protection Agency provides an excellent example of how sustainable development can be integrated into food and farming policy. It looked at the implications of reducing the environmental impact of the farming and food system and noted that the simplest policy option, and one that would also benefit public health, would be to increase the production of plant-based foods for human consumption, and reduce the high level of meat and dairy production and consumption. The table on the next page shows the dietary changes needed in Sweden which, if attained, would reduce energy consumption in the farming and food system by 30%, reduce artificial fertilizer use by between 20 and 40%, and reduce the acreage needed to produce food.

<i>Current food intake and a healthier and more sustainable diet for Sweden (Swedish Environmental Protection Agency, 1999)</i>			
	Current daily intake (g per person per day)	Improved diet (g per person per day)	% change
Dried legumes	5	50	+1000
Root vegetables	25	100	+400
Cereals	15	45	+300
Potatoes	140	270	+193
Bread	100	200	+100
Vegetables	150	190	+27
Fruit	150	175	+17
Fish	30	30	0
Margarine/butter/oil	50	50	0
Milk products	400	300	-25
Snacks/sweets	200	140	-30
Soft drinks	150	80	-47
Cheese	45	20	-56
Eggs	25	10	-60
Meat, poultry, sausage	145	35	-76

Although the dietary pattern does not entirely match that in the UK (and the “improved diet” does not meet the 400g daily target for fruit and vegetable consumption), the direction of the changes needed is clear. Calculations could easily be done on the health and other benefits that could be expected from the improved diet.

Based on this Swedish data, the following issues are examples (by no means exhaustive) that the FSA should tackle, incorporating the principles of sustainable development. The examples show that taking action on these issues would, simultaneously, help reach the Agency’s targets on safety, nutrition and choice, as well as reduce damage to the environment.

Reducing consumption of meat and dairy products

The most common sources of food borne infectious organisms capable of affecting human health are animals and their products, since human biology is more similar to animals than to plants. Hence meat and animal products are the most commonly cited sources of food poisoning organisms. Reducing consumption of meat and dairy products would therefore contribute to achieving the FSA’s aim of reducing food borne illness.

Meat products and dairy products are also major sources of fat and saturated fat in the diet and - in the case of meat products and cheese – of dietary salt intakes. Eating fewer of these products would reduce the energy density of the diet, and would contribute to lowering the risk of coronary heart disease and strokes. Moreover, the then Committee on the Medical Aspects of Food Policy recommended, in 1998 in its report on diet and cancer, that people should eat no more than 90g per day of red and processed meat to reduce their risk of colorectal cancer. Current consumption levels are much higher than this.

Very few citizens are aware of this latter recommendation so work by the FSA in this area would enhance people's knowledge and understanding and inform choice. The FSA's planned work on declarations of origin, and on assurance schemes would also help those citizens who wish to support British meat and dairy farmers and, if assurance schemes are sufficiently rigorous, buy products made from animals reared to higher standards.

However, the FSA has not indicated that it intends to help those citizens who wish to buy organic produce and this seems anomalous. There is accumulating evidence that organic livestock and dairy farmers not only have higher animal welfare standards (which can reduce the incidence of animal disease, including zoonoses), but also – due to reduced stocking densities - are less polluting of the air, water and soil, all of which have human health implications. More recent evidence indicates that the fat in organic meat and dairy products is higher in essential fatty acids such as omega 3 and conjugated linoleic acid, and correspondingly lower in saturated fat. In addition, antibiotics are not permitted for routine use in organic farming, so there is a reduced risk of such residues, and their attendant health risks.

Changing policy on fish

The most common source of omega 3 in the diet is oily fish, hence the FSA recommendation to eat one portion of oily fish a week (and another portion of any other type of fish). Current consumption levels are below two weekly portions but there is a direct conflict with sustainable development in recommending people eat more fish, as there is a global crisis of declining wild fish stocks. The problem cannot be solved by recommending people eat only farmed fish as, despite FSA reassurances, food safety concerns remain about levels of polychlorinated biphenyls (PCBs) in farmed fish. Fish farming also causes well-documented damage to local ecosystems, and to wild fish stocks (thereby further reducing the amount of fish available to consume).

The FSA issues periodic safety advice to pregnant and breast-feeding women and children under 16, advising them to limit their consumption of tuna and to avoid eating shark, swordfish and marlin, due to mercury contamination. It is highly unlikely that this information appears on any fish or fish product labelling, and most affected citizens are unlikely to be aware of this advice.

The FSA could add considerable value to the issue of fish, health and sustainability by undertaking research on the health and environmental implications of people consuming two portions of fish a week (with one being oily fish) but only from species that can be caught sustainably (or are being farmed humanely, without environmental damage). Once robust data is available, comprehensive and comprehensible labelling would be an invaluable aid to choice.

Increasing consumption of fruit, vegetables and cereals

Although food poisoning linked to plants is less prevalent than that linked to animal products, it will be important for the FSA to ensure that food poisoning levels do not rise if fruit and vegetable consumption levels rise to those recommended for health (i.e. to at least 400g per day). Similarly, mycotoxins can affect nuts, seeds and cereals and measures should be in hand to ensure contamination does not cause health problems if, in accordance with health recommendations, consumption of these products rises.

FSA policy to reduce pesticide residues, and to label post-harvest treatments, should help to increase choice for those who wish to avoid such agrichemicals due to concerns about their safety and/or their impact on the environment. However, many pesticides are used merely to enhance the cosmetic appearance of some fruit and vegetables. These pesticides, like all such chemicals, can cause health problems to the people applying them (or to those accidentally sprayed or caught in spray drift) and can leach into water supplies, which can also increase health risks. It would be very helpful for the FSA to undertake work on the implications of abandoning the use of pesticides for cosmetic purposes, including how the resulting “imperfect” produce can be marketed.

Such a policy may also have nutritional benefits (in addition to possibly encouraging people to eat more fruit and vegetables due to reduced concerns about pesticide residues). Substances known as phenolics have antioxidant properties that can help protect against coronary heart disease and some cancers. Plants produce phenolics when attacked by pests so, if fewer pesticides are used (or none, routinely, as in organic farming), then some pest “damage” might increase antioxidant levels in the produce.

Additional research in this area, and into the related evidence that indicates that intensive growing methods may reduce vitamin and mineral levels in crops, would be very helpful. Research would also be invaluable into varieties of cereals for human consumption that can be consumed by people who are allergic or intolerant to wheat. Even for those who can safely consume wheat, eating a wider variety of cereals is likely to have nutritional benefits due to the broader range of vitamins and minerals that would be eaten. Increased crop diversity would also have a number of benefits for biodiversity, wildlife and environmental quality.

5. We recognise that we will need to work with a wide range of interests to deliver the proposed targets. Have we overlooked any groups or individuals who will have a key role to play?

Pages 12 and 13 of the draft strategic plan lists a good range of potential partners. However, obvious omissions are the agriculture and environment departments in the different countries, and the Sustainable Development Commission. These links should become increasingly important as the Agency develops its work on sustainable development. In fact, it is hard to think of any government department or agency that does not have some impact – direct or indirect - on “the interests of consumers in relation to food”.

We do not propose to list here all possible permutations of links with government departments and agencies, but would note the following: The Department for Culture, Media and Sport, for example, is relevant to discussions about promoting food to children and the appropriateness of links between food companies and sport. The Treasury is pivotal in many respects, but particularly in setting benefit levels, which can have a profound effect on the

diets of people living on low incomes. Planning and transport policies can also inhibit or facilitate access to shops selling healthy food.

We welcome, of course, the inclusion of consumer bodies but would note that the public interest or voluntary sector – for example as represented in Sustain’s membership – covers a wide range of organisations, not all of which would commonly be described as consumer bodies. We believe all of these have a valuable contribution to make.

Finally, alongside European partners, we would add international organisations to the list of those with a role to play. These are mentioned in the draft strategic plan on page 28 and, as well as the Codex Alimentarius Commission, we would also add the World Trade Organization, since its impact on the quality and quantity of traded food can be considerable.

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In supporting this document, each of the following 42 organisations is indicating its formal agreement only in those areas where it has specific competence. At the same time, each acknowledges the expertise and authority of the other organisations in their respective fields. In addition, collectively the following organisations endorse the general principles outlined at the beginning of the document on the main elements of sustainable development, as it affects food and farming policy.

Allergy Alliance	Land Heritage
Association of School Health Education	National Consumer Council
Co-ordinators	National Federation of Women’s Institutes
Baby Milk Action	National Heart Forum
Biodynamic Agriculture Association	National Oral Health Promotion Group
British Association for the Study of	Northern Ireland Chest Heart and Stroke
Community Dentistry	Association
British Heart Foundation Health Promotion	Permaculture Association
Research Group	Royal Society for the Promotion of Health
Campaign for Real Ale	Royal Society for the Protection of Birds
Centre for Food Policy, City University	Small and Family Farms Alliance
Chartered Institute of Environmental Health	Soil Association
Commonwork Land Trust	UK Public Health Association
Community Nutrition Group	UNISON
Compassion in World Farming	Vegetarian Society
Consensus Action on Salt and Health	World Cancer Research Fund
Ecological Foundation	World-Wide Opportunities on Organic Farms
Elm Farm Research Centre	
Farm	
Farmers Link	
Food Additives Campaign Team	
Food Commission	
Friends of the Earth	
Guild of Food Writers	
Health Education Trust	
HDRA – The Organic Organisation	
HUSH – The UK E.Coli Support Group	
Hyperactive Children’s Support Group	
Institute of Consumer Sciences	