

**SUSTAIN RESPONSE TO THE CONSULTATION FROM THE
DEPARTMENT OF ENVIRONMENT, FOOD AND RURAL AFFAIRS
TAKING IT ON:
DEVELOPING A UK SUSTAINABLE DEVELOPMENT STRATEGY TOGETHER**

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).

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, along with recommendations in those areas where they have expertise. References are available for any studies cited.

GENERAL COMMENTS

As is clear from the above summary description of Sustain, our remit covers only farming and food issues so our answers are focused on this area. However, as the farming and food system has a profound impact on all elements of sustainable development, this has not been unduly restrictive. Nonetheless, we have tried to keep our response as brief as possible for three reasons:

- **Consultation fatigue.** Individually and collectively, Sustain's membership has recently been involved in a number of major government consultative exercises, including two from the Food Standards Agency (on its draft strategic plan for 2005-2010, and on food promotion to children) and two from the Department of Health (on the public health white paper, *Choosing Health?*, and within that, on priorities for a food and health action plan). We shall, of course, draw heavily on the material from those response for this current consultation but, given limited funding and time, we have been unable to engage as vigorously as we would have liked in this vital development.
- **Acknowledgement of the administrative burden on the Sustainable Development Unit (SDU).** This consultation exercise is likely to generate an enormous volume of responses and we consider that the SDU is understaffed and underfunded for the scale of the task it needs to undertake, both in this exercise and in the even more difficult task to follow of implementing the results. Sustain and its membership would be delighted to meet relevant officials to elaborate on any of the issues raised here, but this response has aimed for brevity.
- **The emergence of common themes.** Although there are 42 separate questions (not including sub-sections), and we have done our best to be specific, some essential themes recur. It is clear to us that for any individual, or groups of individuals (whether in the public, private or voluntary sectors), to change what they do so that they contribute to sustainable development, rather than undermine it, then – to paraphrase from the World Health Organisation – government needs to make the sustainable development choice the easy choice.

By easy we mean affordable, available and attractive and, by implication, the choices that undermine sustainable development (SD) need to be made difficult i.e. expensive, inconvenient and socially unacceptable. This means that government should use:

- **Fiscal measures.** Taxes and subsidies should reward action that contributes to SD and penalise action that damages SD. Fiscal policy also has a recognised role in correcting market failures when prices do not accurately reflect the full costs of a good or service over its whole life cycle.
- **Regulation.** Government has a duty to signal clearly when an issue is important by creating statutory obligations. This has the benefit not only of clarity for everyone in society, but also of creating a “level playing field” so businesses can compete fairly.
- **Promotion.** A thorough set of fiscal measures, linked to a clear and fair legal framework should make SD affordable and available. Vigorous, imaginative and long-lasting promotional campaigns will also be needed to make SD attractive. This would include, but would certainly not be limited to, the incorporation of SD into the curricula of all educational institutions.

We make no apology for the fact that these points are not original. The bones of such a strategy have been fleshed out many times over the years, and in government approaches all over the world, in successful policies to tackle such diverse problems such as tobacco, drink driving, traffic congestion and waste from disposable plastic shopping bags. We are repeating them – here and again in our responses to the questions below – for two reasons:

- **Government is failing to accept its responsibilities in these areas.** Time and again government indicates its reluctance to use fiscal measures, its preference for voluntary approaches rather than regulation, and an approach to promoting SD that is – at best – patchy. We know that government knows its current approach will not work. We believe we have a duty – as part of the independent voluntary sector – to point out that “the emperor has no clothes”. As an example, the government appears to have relinquished governance of agri-food to the supermarkets, perhaps because supermarkets often have higher standards than the basic legal standards. But where consumer interests and sustainability do not intersect, such as in fairness and justice in trading relations between retailers and suppliers, there is evidence that the private sector drives a ‘race to the bottom’ against the broader interests of sustainability.
- **Parts of the private sector are lobbying vigorously against this approach.** While many companies are doing what they are supposed to do (according to economic theory) in a competitive market economy – diversifying, innovating and exploiting the new market opportunities presented by SD – many more are not. Rich and powerful corporations and their industry associations, many operating globally, lobby energetically against fiscal measures (unless they are actually receiving taxpayers money, then they become predictably silent), and against regulations (almost always characterised as burdensome). Their considerable promotional and marketing budgets are focused on creating and maintaining an alluring image for the endless consumption of good and services, most of which are unsustainable.

Fundamentally, government is unwilling even to face, let alone tackle, the conflict between the private profit of some companies and the benefit to society as a whole of sustainable

development. Instead it takes refuge in hollow concepts such as “spreading good practice”, instead of changing price signals, “working in partnership” instead of changing the law, and “providing information and choice” instead of full-blooded marketing of the fact that a SD strategy will improve the quality of all our lives. The problem is not lack of stakeholder consultation, but lack of political will.

SUSTAIN’S RESPONSE TO THE QUESTIONS POSED

The approach to a new strategy

1 What do you think of our approach to the content and structure of a new strategy?

In the DEFRA report *Interim summary of responses from “virtual panel” participants*, some have already expressed their concern that this government exercise is **just “more words”**. While Sustain warmly welcomes this review of government’s 1999 SD strategy, it is clear from our opening remarks and from our responses below that we share these concerns. It is very depressing that there is still no sign of any action that would indicate government is willing to make the radical change of direction needed to make the UK’s development sustainable in practice as well as on paper.

The overall impression, throughout the document, is that maintaining or **improving the UK’s economic competitiveness in a global market remains the driving force** of government policy. “Free” markets and trade “liberalisation” are treated by government as an ends in themselves, rather than as a means to an end. The SD strategy is thus simply an attempt to mitigate the most damaging environmental and social consequences of a free market and liberalised trade rules (fewer “bads”). In Sustain’s view, this approach completely misses the point of sustainable development (more “goods”).

The key question is, for Sustain, does the operation of markets and global trade contribute to or detract from the quality of life, key aspects of which, *vis a vis* the farming and food sector, we describe below as environmental quality, health and livelihoods? **Markets do not operate according to the laws of physics, but to the laws and mores of people. Some of these can and should be changed**, so that markets contribute to SD rather than, as now, largely undermine it.

What is sustainable development, and how do we do it?

2 Is an explanation of what sustainable development means based on the UK Government’s four objectives approach of the 1999 strategy useful?

- *if ‘Yes’, what changes would you make to improve it?*
- *if ‘No’, how would you explain it instead?*

3 What should be our vision of sustainable development for the UK?

4 What should be the guiding principles for UK decision-makers, and how can they be made widely practical and relevant both within and beyond government?

5 Are there any social, economic or environmental limits that must be protected in all circumstances? If ‘Yes’ what do you think they are?

We reproduce below Sustain’s attempt to apply the principles of sustainable development to farming and food policy, which we have used as the basis for a number of responses to

previous government consultations. The practical implications of this approach are outlined in our answers to subsequent questions.

Farming and food policy should incorporate sustainable development, by which we mean, in Brundtland's definition, 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 definition, 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.

❖ 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 animal and human 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.

Setting priorities

6 *Are the four priority areas identified above the right ones for the UK as a whole to focus on over the next few years?*

- *Climate change and energy*
- *Sustainable consumption, production and use of natural resources*
- *Environment and social justice*
- *Helping communities to help themselves*

If 'No', what would you change?

7 *What issues do you think are important, or better dealt with, only within the separate UK Government, Scottish Executive, Welsh Assembly Government or Northern Ireland strategies, or at a regional or local level?*

With the exception of biodiversity (which is not explicitly mentioned, but could be included under “natural resources”) the four “priorities” appear to be designed to cover almost all issues and so, arguably, are not priorities at all. As is already clear from our responses above, **Sustain does not consider that lack of priorities is the reason why attempts to achieve SD have failed.** The main reason is government’s unwillingness both to establish a robust fiscal and regulatory framework to make the SD choice the easy choice, and to promote energetically SD as a desirable way to live.

As for issues that should be dealt with nationally, regionally or locally, this seems to be a redundant question, unless there are areas where the extent of devolved powers are unclear. What is unclear, though, is why only public authorities in Wales are under a **legal obligation to incorporate SD into their policies and practices.** This legal duty **should be extended immediately to all levels of government in the UK.**

Climate change and energy

8 *How can we encourage more public involvement in action to reduce emissions?*

9 *How can more people and organisations be encouraged to consider the impacts of climate change on their activities, and to respond to them? What are the opportunities for, and barriers to, progress?*

10 *What opportunities are there for making sure that considering the impacts of climate change are an essential part of policy and decision-making as part of the drive for sustainable development?*

The largest contribution farming makes to climate change comes through the manufacture and use of nitrogen fertiliser (and, to a lesser extent, pesticides). It has been estimated that these produce at least twice as much carbon dioxide as the use of fuel and machinery. Thus non-organic nitrogen in farming should be phased out as rapidly as possible, by changing to organic farming systems.

In addition, our farming and food system is dangerously over-reliant on non-renewable fossil fuel, particularly oil, throughout the food chain, including in food transportation. In 2001 Sustain produced, with Elm Farm Research Centre, an award winning publication *Eating Oil: Food supply in a changing climate*. This report demonstrated that our dependence on oil is potentially catastrophic since supplies are finite and subject to disruption, and their use contributes to climate change and environmental damage. Despite this, food that could be and is produced here is both exported, and imported over long distances with encouragement and funding from government.

A planned and rapid reduction in the farming and food sector's dependence on oil should begin with the re-introduction of the fuel tax escalator and the opening of negotiations with other states on the urgent introduction of a similar tax regime for aviation fuel (the most environmentally damaging form of food transport). This should reduce oil consumption (and associated environmental damage), increase incentives to locate food production as near as possible to consumers, and thereby increase employment in local farming and food industries. Other measures to support the development of a more localised farming and food system are covered in other questions below.

Sustainable consumption, production, and use of natural resources

11 *What steps do you think government, business, and others should be taking to promote a more innovative, competitive, resource-efficient, low-waste, economy whilst also improving our environmental performance?*

12 *What steps do you think need be taken by government, business, and others over the short and long-term to help businesses make more sustainable products (ones that have reduced environmental and social impacts)?*

13 *What steps do you think need to be taken by government, business and others over the short and long-term to help business and household consumers choose more sustainable goods and services?*

14 *What areas of consumption do you think need to be tackled first? Why? What actions need to be taken by whom?*

We have already argued that government needs to **make the SD choice the easy choice – by using fiscal, regulatory and promotional policies**. In farming and food policy this would mean, for example:

- Increasing financial support for the UK's organic farming and food sector, and those wishing to convert;
- Using legislation and fiscal measures to reduce or eliminate the use of agrichemicals such as pesticides, artificial fertilisers and veterinary medicines (the latter should only be permitted to treat sick animals under veterinary supervision);

- Increasing investment in infrastructure – including diverse retail outlets, as well as processing and distribution facilities - to allow more localised food production and consumption systems;
- Using competition policy as a powerful and legitimate arm of sustainable development policy, especially with regard to imbalances of market power in the food chain;
- Taking the lead in international fora to, for example, include carbon dioxide emissions from air freight in assessing all countries' carbon dioxide emissions totals. Currently there is no incentive or mechanism to reduce these emissions;
- Improving the content and enforcing the implementation of the Office of Fair Trading Code of Practice between supermarkets and their suppliers, in order to make fairness and justice in trading an industry standard rather than an expensive consumer niche;
- Setting high SD standards for the food provided in public sector institutions – such as schools, hospitals and social care – and providing more funding so that these standards can be met;
- Introducing legal protection for children from junk food marketing, and enshrining, in law, the place of food education and skills in the national curriculum.
- Amending VAT on food to incorporate SD criteria and remove anomalies such as the VAT exemption for biscuits but VAT levied on fruit juice.

The list above is a much-shortened version of an outline food and health action plan submitted to the Department of Health in July in response to the *Choosing Health? Choosing a better diet* consultation.

At the same time government needs to face, and deal with the fact that **as well as consuming differently, in some sectors we will have to consume less**. Sustain has argued, in its recent submissions to the Food Standards Agency and the Department of Health, that SD would be enhanced by increasing investment in the production and consumption of plant-based foods (particularly fruit, vegetables and a variety of wholegrain cereals), and reducing the high level of meat and dairy production and consumption. It is likely that a higher proportion of this new balance of foods would be purchased from UK producers, both because some UK producers have high standards, and because – being in the UK – these standards can be more easily verified. Reduced imports (and, by implication, exports) would also have a number of food safety, animal health and environmental benefits.

However, as well as rebalancing the food supply, given the current obesity crisis (coupled, perhaps, with a static or declining UK population) **government should also be planning for a reduced food supply**, particularly of energy-dense but nutrient poor foods such as soft drinks, confectionery and fatty/salty snacks. It is worth noting that maintaining the current balance and amount of food produced, and simply exporting surplus animal and dairy products, and junk food, is entirely incompatible with sustainable development.

Environment and social justice

15 How should we bring together 'environment' and 'social' concerns at national, regional or local level?

16 What more could be done to tackle environmental inequalities?

While it is encouraging that government wishes to integrate environmental and social justice issues they should, of course, already be integrated in any SD policy since, if they are not, it is not SD. Inequalities, whether environmental, social or otherwise, can and should be tackled by **increasing the level of benefits and the minimum wage**, since low incomes are at the root of injustice. While those on higher incomes will always be able to buy aspects of a better environment, the regulatory frameworks referred to throughout this document – coupled with higher incomes for the poorest – will ensure that environmental standards will be higher for everyone. For a more comprehensive account of the structural changes that are needed to address unequal access to food and the resulting health injustice, please see Sustain’s 2001 publication *Food Poverty: Policy Options for the New Millennium*.

Helping communities to help themselves

17 What are the main barriers to community action on local social or environmental issues?

18 What can be done at a national or local level to improve support for community action and participation in all areas?

19 How can we empower communities to take greater control over the quality of their local environment and to tackle their other priorities?

In the *Interim summary of responses from “virtual panel” participants*, one respondent has noted that we can no longer assume that communities based on locality still exist throughout the UK. The collapse of a community cohesion in many areas is just one of the effects of the operation of markets, as industries decline or relocate. As elsewhere, the obvious bears repeating, since it is not being acted upon. **For communities to be “empowered” they need to be given legal powers, and the wherewithal – including money, and skills if necessary – to use those powers.** In addition, the focus should not necessarily be only on communities based on locality, but also on communities of interest – such as work or leisure - which transcend such boundaries.

Changing behaviour

20 How is the UK likely to be most successful in achieving the behaviour changes that will be needed if we are to move toward long-term sustainability, and what would be the right balance of measures by government and others?

21 How can communication and raising awareness support government and others’ efforts most effectively?

This is the only section in the consultation document where issues of **affordability, availability and attractiveness** are addressed, albeit briefly. Paragraphs 9.5, 9.6 and 9.9 each touch upon regulatory instruments, using taxes and subsidies to “signal the structural economic changes needed”, and the importance of education and communication. Indeed, Government’s 1997 Statement of Intent on Environmental Taxation made a commitment to shift taxes from goods to environmental “bads” for this reason. However, recent research¹ shows that the share of environmental taxes of total revenue in 2001 was both lower than in 1997 (when the Statement was published) and even lower than in 1994. The research

¹ Ekins, P. 2004 (forthcoming) “UK Environmental Taxes, 1997-2003: A review”, *UK Energy and Environment*, July, Cambridge Econometrics, Cambridge. This information is taken from the response to *Taking it on* by Sustain member, Forum for the Future.

concludes, *inter alia*, "...that the trend of such reduction ... will be continued until at least 2005".

Moreover, government is not currently well placed to undertake the volume and type of SD marketing needed to explain the need and increase public support for environmental taxes. Government should certainly fund such promotion, but levels of public trust in government are so low that government-branded promotional campaigns are likely to be rejected. In contrast, recent experience with anti-smoking policy – where **government has funded independent bodies** in cancer and heart disease prevention **to devise and run marketing campaigns** – seems to have been very successful.

Beyond the UK - sustainable development in Europe and internationally

22 *What are the top international and EU priorities for sustainable development that should be dealt with in the new sustainable development strategy?*

23 *How can we in the UK, at all levels, do more to help other countries achieve sustainable development and to promote and deliver sustainable development internationally or in the EU?*

24 *What distinctive contributions can government, business, charities and non-governmental organisations, and the public make and how might the strategy help kick-start those contributions?*

25 *What lessons can we learn from other countries to shape our sustainable development strategies and how we put them into practice?*

As noted in the *Interim summary of responses from "virtual panel" participants*, The Common Agricultural Policy (CAP) continues to be in need of fundamental reform since, as it currently operates, it undermines SD both in the EU and globally. We agree that the following policy changes are urgent priorities:

- Social (particularly health, and fair trade) and environmental objectives should be given prominence in reformed objectives for the CAP, and financial support altered accordingly.
- Subsidies that support export "dumping" should be phased out immediately.
- Citizens have the right to know how their taxes are being spent, so there should be full disclosure of all payments in excess of £20,000.

To help other countries achieve SD the UK government should, **as a matter of urgency, meet the UN target of increasing the aid budget to at least 0.7% of Gross National Income**. All aid offered should, of course, be compatible with SD so we should not be exporting any farming or food technology, methods or products that are already unacceptable in the UK or are being phased out as part of our SD strategy. In particular, we should not be exporting intensive animal and dairy farming systems, since these are already threatening to undermine environmental quality, public health and rural economic development in poor countries in broadly the same way as these systems have done in the UK. Nor, for the same reason, should we be exporting junk food, and the promotional techniques associated with it.

Above all, the UK and other **rich countries should promote SD internationally by implementing –rather than talking about - SD strategies in their own countries**. Rich countries are often correctly accused by poorer ones of hypocrisy, as we insist they do as we

say, not as we do. If rich countries, with all the money and expertise at our disposal cannot make SD work, how can we exhort others to make progress?

As for distinctive contributions, inside the UK as well as beyond it, we consider the respective roles of the public, private and voluntary sectors are as follows:

- Governments (including at EU and WTO level) should set the regulatory framework, use fiscal measures to provide the right incentives for SD in the market, and fund campaigns to promote SD.
- The private sector should innovate in response to the supportive conditions for SD set by governments, and stop lobbying against such changes.
- The voluntary sector should continue to monitor progress (or lack of it) towards SD by the public and private sectors, and mobilise public opinion so that both public and private policy makers are held to account.

Getting the structures right for leadership

26 What more do we in Government need to do to improve our own leadership in sustainable development? How would you like to see reporting improved?

27 What do you see holding back effective action by Government?

28 In what areas is a clearer lead from us needed to promote sustainable development? What form might this take?

We have already noted that government is unwilling even to face, let alone tackle, the conflict between the private profit of some companies and the benefit to society as a whole of sustainable development. This **lack of political courage is compounded by the “short-termism”** that afflicts most political debate, which conflicts sharply with the long timescales needed to deal with SD.

As it is unlikely that the current generation of politicians – from whatever main party – will suddenly be overcome by bravery and a willingness to take the long view, leadership is most likely in those areas where conflict is absent or minimal, and relatively rapid results are possible. In the farming and food area, most promise seems to be in **incorporating SD into public sector catering**. On the basis of experience in the UK and throughout the world this can:

- improve people’s satisfaction with public services. Good food in schools, hospitals, social care services and so on is not only immediately enjoyable, but should also help to enhance health in the longer term. Moreover, since users of many public services are on low incomes, better public sector food can contribute to social justice.
- protect the environment. Food produced sustainably will reduce air, water and land pollution, reduce the toxic load, improve animal welfare standards and increase biodiversity.
- stimulate the local economy. Farmers, processors, retailers, distributors and so on can all benefit if they are able to supply local public sector caterers. The multiplier effect of money spent with local firms has been well-documented.

As emphasised throughout this document, more money, more sympathetic regulations (at UK and EU level) and more promotional work would speed progress in this promising area.

In the English regions

29 *What are the main challenges for delivering sustainable development in your region?*

30 *How can Regional Chambers, Regional Development Agencies and other regional organisations better deliver sustainable development? What contributions from a national and local level would help the regions to improve delivery of sustainable development?*

31 *How can regional sustainable development frameworks better contribute to the delivery of sustainable development?*

The promotion of food grown in and around London is an issue championed by Sustain's London Food Link project in order to benefit the environment, public health, the local economy and local communities. As noted throughout this document, funding, supportive regulations and vigorous promotional activity by London government would all help. Establishing a target, say 10% by 2006, of food in the public sector to come from sustainable supplies would be a good start. Local and organic supplies would be ideal, but while producers convert to organic systems (and funding is required for this) local producers should be preferred, alongside fair trade produce that cannot be grown here. Such a policy would increase the scale of production, which may allow some efficiencies and cost savings, thereby reducing prices and opening up new markets in which prices are currently a barrier to increasing sustainable supplies.

At the local level

32 *What are the main challenges for delivering sustainable development in your local area?*

33 *How can we re-energise local delivery and strengthen local leadership for sustainable development?*

34 *How could local stakeholders make the most of existing partnership arrangements, strategy requirements, freedoms and flexibilities to improve delivery of sustainable development?*

35 *What can be done to build the capacity of local professionals and local communities to deliver sustainable development?*

Sustain's Food Poverty Project has years of experience working with community food projects, that often provide an invaluable service to some people in particular areas. However, they are under-funded, rely predominantly on volunteers and are constantly being asked to justify their existence. Even in the public sector, all too often, "solving" local food access problems is put in the job descriptions of lower level local authority or health service employees. Many of these are very imaginative and hard working, but they are rarely given the power, training or funding to make a significant dent in the sustainability of the local food system. Thus it is not capacity that is lacking at local level but, as ever, cash, legal obligations and public support.

The business contribution to sustainable development

36 *What more needs to be done to improve the business contribution to delivering sustainable development?*

37 *What actions should we take to support, enable or require a higher level of business contribution?*

As noted above, we consider that the private sector should innovate in response to the supportive conditions for SD set by governments, and stop lobbying against such changes. For example, the prevailing supermarket price war - conducted in the name of consumer welfare - is severely restricting the entire agrifood chain's room for manoeuvre for investing in sustainability.

Measuring our progress

38 *What are the strengths and weaknesses of the current sustainable development indicators, and how they are used?*

- *In general*
- *More specifically indicators used:*
 - *in the UK Government's headline set;*
 - *in the wider UK core set in 'Quality of life counts';*
 - *in Scotland, Wales and Northern Ireland;*
 - *in the English regions;*
 - *in local authorities; and*
 - *elsewhere (for example sectoral indicators).*

39 *What needs to be monitored and measured UK-wide?*

40 *Who are the audiences for indicators and how could we better meet their needs?*

41 *Should any set of indicators supporting the new strategy*

- *concentrate on just the main priorities in the strategic framework; or*
- *be wider and more comprehensive?*

42 *Should important high-level sustainable development indicators focus on monitoring*

- *general progress towards final outcomes;*
- *specific delivery actions and targets; or*
- *both?*

Sustain does not have a view on the issues around SD indicators. However, we support the views of those who have drawn attention to the fact that traditional measures of economic growth and how to increase growth rates continue to dominate political and economic discussions on policy options, including over SD. This is despite the fact that these traditional measures have repeatedly and convincingly been shown to have, at best, a tenuous link to the quality of life and SD.

This point can be illustrated powerfully by the following example². A person may follow health advice to be physically active and eat more fruit and vegetables by using electrically-powered equipment at a gym, and buying air-freighted and intensively produced fruit and vegetables from a major retailer. At each stage of the process, economic activity is registered in growth figures, but the impact on SD is almost entirely negative. Conversely, a person may be physically active in a garden or allotment, growing fruit and vegetables organically for their own consumption and for sharing with family and friends. Insofar as this may lead to lower purchases of fruit and vegetables, this activity may have a negative effect on economic growth figures. However, the contribution to SD is very positive, for example reducing the use of energy, agrichemicals, transport and packaging, producing less waste,

² The example is drawn from the response to *Taking it on* by a Sustain member organisation, Farmers Link.

promoting green spaces, improving the nutritional value of produce and strengthening family and community cohesion.

Unless and until government gets to grips with this fundamental tension – actually *taking it on* - Sustain and its membership are not sanguine about the prospects for sustainable development in the UK or anywhere else.

Jeanette Longfield, Co-ordinator
Sustain: the alliance for better food and farming
94 White Lion Street, London N1 9PF
Tel: 020-7837-1228 Fax: 020-7837-1141
Email: jeanette@sustainweb.org
Web: www.sustainweb.org

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In supporting this document, each of the following 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 comments at the beginning of the document and the main elements of sustainable development, as it affects food and farming policy.

Agricultural Christian Fellowship
Baby Milk Action
British Association for the Study of Community Dentistry
British Heart Foundation Health Promotion Research Group
Campaign for Real Ale
Centre for Food Policy, City University
Compassion in World Farming
Ecological Foundation
Farmers Link
Federation of City Farms and Community Gardens
Food Commission
Guild of Food Writers
Health Education Trust
HUSH – The UK E.Coli Support Group
International Institute for Environment and Development
Royal Society for the Promotion of Health
Soil Association