

FINAL SUSTAIN RESPONSE TO THE CONSULTATION DOCUMENT ISSUED BY THE POLICY COMMISSION ON THE FUTURE OF FARMING AND FOOD

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.

Most of the proposals in this submission have already been published, in one form or another, by organisations in our membership individually, collectively or as part of a Sustain project in which sections of the membership work collaboratively. However, the membership asked the secretariat to prepare a Sustain response to the Commission which would integrate these proposals into a single document, and add new or updated suggestions as appropriate: hence this paper. Unfortunately, due to the Commission's tight timetable, it was not possible for Sustain's membership as a whole to examine this paper in its entirety before the deadline, so an interim submission was made.

The process of obtaining endorsements from Sustain's membership has now been completed and no substantial changes to the document were proposed. At the end of the document is a list of those among Sustain's membership who wish, explicitly, to endorse the document's main principles.

ADDITIONAL DOCUMENTS

Aware of the Commission's tight timetable, heavy workload and anticipated high volume of submissions, this paper aims only to summarise important points. It is not comprehensive and it does not attempt, in any of the four sections, to set issues in order of priority. Additional documents, elaborating on the arguments and proposals made in the main paper are referred to in the footnotes. Please contact Sustain if there is any difficulty in obtaining these references.

1. AS CITIZENS, CONSUMERS AND TAXPAYERS, WHAT SHOULD WE EXPECT OF THE COUNTRYSIDE, FARMING AND THE FOOD SECTOR?

Sustain, as an alliance of citizens' organisations, answers this question in that capacity. As our remit extends only to food and farming, those countryside issues outside that remit are left to others better qualified to comment.

Food, as a vital human requirement, must be provided by a farming and food sector that is **resilient** – diverse and flexible enough to respond quickly to current and future shocks. All the signs are that the current system is rigid, with a tendency to monopoly and uniformity, leaving it dangerously vulnerable to ecological, economic and social disturbances. These weaknesses are explored in more detail below.

A resilient farming and food sector should provide:

- ❖ Sustainability, 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 (see below) alongside environmental imperatives.
- ❖ Health, by which we mean, using the World Health Organisation's definition², physical and mental well-being, not merely the absence of disease.
- ❖ Livelihoods, by which we mean, jobs that provide a living wage, with good working conditions, rights to protection and opportunities for development.

In providing this for UK citizens, the 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.

Elements of these three key requirements, which are inter-related, include:

- ❖ Sustainability:
 - 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.
- ❖ Health:
 - food uncontaminated by microbiological poisons or toxic residues;
 - food that does not compromise our resistance to infection, or render ineffective medical treatments;
 - a food supply that is nutrient-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 nuts, seeds and pulses, 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. This concept, and its application to the farming and food sector, is explored in more detail in Sustain's response to DEFRA's consultation document, *A new department – a new agenda*. 2001. Unpublished,

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

- ❖ **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.

Underpinning what citizens expect 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 sustainability, health and livelihoods;
- 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.

2. AGAINST THAT BACKGROUND, WHAT IS GOOD ABOUT FARMING (AS LAND MANAGER AND AS FOOD PRODUCER) AND THE FOOD SECTOR AT PRESENT THAT WE SHOULD TRY TO PRESERVE, AND WHAT ARE THE PROBLEMS?

Good features to preserve include:

- ❖ **Levels of awareness** about the effects of the farming and food sector on sustainability, health and livelihoods that are, arguably, higher than at any point since industrialisation (i.e. since the majority of people ceased to have direct contact with the sector). This is reflected in:
 - surveys. The Food Standards Agency's recent survey³ revealed a number of issues that respondents considered very/quite important, e.g.:

- you and your family's health	98%
- conditions in which animals are raised	88%
- environmental concerns	88%
- locally produced food	65%
- seasonal choices	56%
 - **purchasing patterns.** The market for organic produce, for example, is growing at around 40% per year⁴, despite higher prices. Clearly purchasers are making the links between their concerns outlined above, and organic food which can meet many of their concerns. In particular, there is good evidence that organic production methods are beneficial for the environment and animal welfare, and organic products contain fewer agricultural residues⁵;
 - an increasing number and diversity of **direct links between primary food producers and purchasers** e.g.

³ Food Concerns Omnibus Survey, by COI Communications for the Food Standards Agency, 27 September 2001

⁴ Soil Association, *Organic Food and Farming Report 2000*, Soil Association: Bristol.

⁵ *Organic food and farming – myth and reality. Organic vs non-organic: the facts*, 2001, Soil Association: Bristol and Sustain: London

- farmers' markets (from a handful in the mid-1990s to some 300 in 2001⁶)
 - local organic suppliers for school meals services⁷
 - food co-operatives and other local food projects (membership of Sustain's Food Poverty Network grew from 95 in 1997 to 539 in 2001⁸)
 - allotments and other urban agriculture initiatives⁹
 - **high levels of interest in food culture**, manifested in sales of cookery books and other food-related titles, in ratings for TV programmes on cookery and food, and in the burgeoning of good quality restaurants across the country.
- ❖ **Resilience and innovation** in some parts of the farming and food sector, for example:
- a 246% increase in the number of certified organic farmers, from 828 in April 1997 to 2,865 in April 2000¹⁰;
 - a doubling of the market share of microbreweries (from 1% in 1989 to 2% in 1997), despite dominance of major multinationals¹¹;
 - the growing popularity of Apple Day, and burgeoning interest in traditional apple varieties¹², despite continued official payments for grubbing up orchards.

It should also be acknowledged that the UK, in common with other industrialised countries, has a farming and food sector that provides abundant, year-round supplies.

Problems to tackle include:

- ❖ **Over-abundance** of some supplies, particularly of **fatty and/or sugary and/or salty foods**, which has contributed to this country's unenviably high incidence of diet-related diseases such as cardiovascular disease¹³, some cancers¹⁴, diabetes¹⁵ and dental disease, and to obesity, which predisposes to several debilitating conditions¹⁶. Moreover, rates of obesity continue to climb, and among children have been described as "epidemic"¹⁷. Ironically, these diseases of "affluence" are most common among the poorest people, including in rural, food-producing areas¹⁸, leading to morally **unacceptable health inequalities**¹⁹;

⁶ *Local Food Routes*. 2001. Soil Association: Bristol. See also National Association of Farmers' Markets – www.farmersmarkets.net. See also Bullock, S, *The Economic Benefits of Farmers Markets*. 2000. Friends of the Earth: London

⁷ *Good Food for All: Proceedings of a conference in Reading, May 2001*. East Anglia Food Links: Norfolk

⁸ Food Poverty Network, Sustain: London – www.food.poverty.hda-online.org.uk

⁹ Garnett, T, Gillie, L, *CityHarvest: The feasibility of growing more food in London*, 1999, Sustain: London. See also the Federation of City Farms and Community Gardens – www.farmgarden.org.uk

¹⁰ Soil Association, *Organic Food and Farming Report 2000*, Soil Association: Bristol.

¹¹ Vaughan, A, *Bitter harvest, bitter beer: The impact of beer production and consumption on people and the environment*, 1999 Sustain: London

¹² Apple Day, facilitated by Common Ground, is now in its 12th year and is celebrated across the country – www.commonground.org.uk

¹³ British Heart Foundation Health Promotion Research Group – www.heartstats.org

¹⁴ World Cancer Research Fund – www.wcrf.org

¹⁵ Diabetes UK – www.diabetes.org.uk

¹⁶ *Tackling Obesity in England*, 2001, National Audit Office: London

¹⁷ Fruhbeck, G. *Childhood obesity: Time for action, not complacency*. 2000. British Medical Journal, 320, 328-329

¹⁸ Williams, V, *Do you live in a food desert?* Landworker, November/December 2000. Transport and General Workers' Union: London

¹⁹ Webb, A, *Food Poverty: Policy Options for the New Millennium*. In press. Sustain: London

- ❖ **Under-investment in fruit and vegetable production**, low consumption of which is a key factor in health inequalities²⁰, and low production of which contributes to a high and rising food trade gap²¹;
- ❖ **Over-reliance on non-renewable fossil fuel**, particularly oil, throughout the food chain and especially in food transportation. This dependence on oil is potentially disastrous since supplies are finite²² and subject to disruption²³, and their use contributes to climate change²⁴ and environmental damage²⁵. Despite this, food which could be and is produced and consumed here is both exported, and imported²⁶, using considerable quantities of oil;
- ❖ **High rates of food poisoning**, some instances of which can be fatal or severely debilitating²⁷, as well as unpleasant and causing economic losses²⁸. In addition, treating food poisoning cases is becoming increasingly difficult due to the development of **antibiotic resistance**. Routine use of antibiotics in intensive animal farming systems is contributing, alongside over-use in human medicine, to this grave, world-wide problem²⁹;
- ❖ Poor animal welfare standards, due to the failure of intensive systems to respect natural behaviour patterns, overstocking, mixing animals from different groups, and too long and too frequent transportation of live animals. This, coupled with a shrinking genetic pool of farmed livestock, has both **increased animals' susceptibility to disease (and people's exposure to those that are zoonotic)**, and has encouraged the rapid spread of diseases such as BSE, foot and mouth disease, and swine fever³⁰;
- ❖ Continued **over-use of biocides and artificial fertilizers**, and other intensive farming methods which contribute to water pollution, destruction of natural habitats, declining wildlife populations and dependence on a small (and therefore susceptible) genetic stock of key food crops³¹. Biocides also entail health risks to

²⁰ National Food Survey data, quoted in the *Food Magazine*, Jan/March 2001

²¹ Jones, A, *Eating Oil: Food supply in a changing climate*. In press. Sustain: London

²² It has been calculated that crude oil reserves will be exhausted by 2040. Oil Reserves. Medea. – European Agency for international Information at www.medeabe/en/

²³ Prices of crude oil doubled or trebled in 1973, 1980, 1991 and 2000. Cited in Jones, A, *Eating Oil: Food supply in a changing climate*. In press. Sustain: London

²⁴ See analysis and recommendations by the Intergovernmental Panel on Climate Change and the Royal Commission on Environmental Pollution

²⁵ Jones, A, *Eating Oil: Food supply in a changing climate*. In press. Sustain: London

²⁶ Lucas, C. *Stopping the great food swap: Relocalising Europe's food supply*. 2001. The Greens/European Free Alliance in the European Parliament: Brussels.

²⁷ See information leaflet produced by HUSH: The UK E.coli Support Group on the effects of Haemolytic Uraemic Syndrome and Thrombotic Thrombocytopenic Purpura. www.ecoli-uk.co.uk

²⁸ Pretty, J, et al, *An assessment of the total external costs of UK agriculture 2000*. Agricultural Systems, 65(2), 113-136.

²⁹ Craig, A, Young, R, *Too Hard to Swallow – the truth about drugs and poultry*. 2001. Soil Association: Bristol. Also, Fookes, C, Dalmeny, K, *Organic food and farming – myth and reality. Organic vs non-organic: the facts*. 2001. Soil Association: Bristol and Sustain: London

³⁰ For further details see the response to the Commission by Compassion in World Farming

³¹ See submission to the Commission from Friends of the Earth

farm workers using them³², and to people (particularly children) consuming “cocktails” of residues³³;

- ❖ Failure to deal adequately with **waste in the farming and food sector** leading to unsafe food and feed re-entering the system³⁴, nutrients being lost from the food cycle, and disposal problem such as landfilling and incineration³⁵;
- ❖ Flawed research into, and public consultation on the need for and **potentially irreversible damage by Genetically Modified (GM) crops** to environmental sustainability and health. Irreversible contamination by GM crops of conventional and organic crops would also deny consumer choice and potentially threaten the economic viability of the UK’s farming and food system. A recent survey showed 42% of respondents preferred zero GM contamination³⁶, and there is no evidence of buoyant overseas demand for GM food;
- ❖ **Inadequate funding and numbers of staff for food law enforcement**, including laboratory analysis services on which enforcement depends. A recruitment crisis is currently exacerbating an already serious problem, allowing hygiene³⁷ and food standards legislation³⁸ to be flouted routinely;
- ❖ Overproduction of some foods, coupled with subsidies permitted by the Common Agricultural Policy, which allows the UK to join other EU countries in **“dumping” produce in poorer, Southern countries**. This, combined with tariffs that inhibit imports to the EU of value-added produce from the South, undermines the economic viability of Southern countries’ producers and threatens food security³⁹;
- ❖ **Low status jobs in the farming and food sector**. Farmers and farm workers are continuing to leave the sector, either retiring or being driven from the market by economic pressures⁴⁰ (some to the point of suicide). Given the current unattractiveness of the sector, coupled with barriers to entry⁴¹, the sector may soon be facing a recruitment crisis. Moreover, those lost to farming take with them invaluable local knowledge and skills⁴².

³² Pesticides Action Network UK – www.pan-uk.org

³³ Pesticides Action Network UK – www.pan-uk.org

³⁴ See the Food Standards Agency for details of unfit meat entering the food chain.

³⁵ Friends of the Earth – www.foe.co.uk

³⁶ Genetically Modified Food Labelling Omnibus Survey of 2000 representative GB adults conducted in August 2001 by RSGB Omnibus for the National Consumer Council

³⁷ See *Environmental Health News*, *passim* Chartered Institute of Environmental Health: London

³⁸ *The Food Magazine*. Issue 55, Oct/Dec 2001 and *passim*. The Food Commission: London

³⁹ *World Trade Organisation and Food Security*, 2001. Unpublished. Sustain and UK Food Group: London. Also *Food Rights: Re-writing trade rules*. 2001. Action Aid: London

⁴⁰ In the two years to June 2000 51,300 farmers and farm workers left the industry. National Farmers’ Union Farming Fact Sheet, 25 October 2001. www.nfu.org.uk

⁴¹ Hird, V, *Double yield: Jobs and sustainable food production*. 1987. SAFE Alliance. Available from Sustain: London

⁴² See submission to the Commission by Friends of the Earth

For those that remain in the sector, farm workers are often recruited illegally, are paid less than the minimum wage and work in appalling conditions⁴³. Further up the food chain jobs are often characterised by low pay, insecurity, and low skill and training requirements – popularly termed “McJobs”. Parts of the food industry that require a skilled workforce have reported recruitment problems⁴⁴.

- ❖ **Public funding declining as a proportion of research in the farming and food sector.** Research institutes are increasingly dependent on commercial sources of funding to continue and develop their work⁴⁵. This skews research priorities towards issues which interest companies that are doing well out of the current system. Private funding also means that valuable research results can be kept out of the public domain. By contrast, research into alternatives to this system is under-funded. For a variety of reasons, even publicly funded research has begun to reflect commercial interests. For example, research into GM food (which attracts no discernable consumer demand, but considerable commercial support) absorbed some £27 million government funding last year. Research into organic systems (where there is chronic under-supply for the current demand) received a mere £2 million⁴⁶

3. WHAT ARE THE FACTORS DRIVING THESE GOOD AND BAD ASPECTS, AND HOW?

Factors driving the bad aspects include:

- ❖ **Treating trade liberalisation as an end in itself, rather than a means to an end.** Arguments about trade are often characterised as being “pro” or “anti” which, in Sustain’s view, misses the point. The key question is whether trade contributes to or detracts from the “quality of life”, key aspects of which, *vis a vis* the farming and food sector, we have described above as sustainability, health and livelihoods? It is likely that some trade, under some circumstances will enhance these aspects, and this should be encouraged. The “fair trade” movement is an example of this. Some trade will undermine the achievement of these goals and should be either abandoned or modified. In practice, all trade is currently regarded as “a good thing” and encouraged irrespective of its positive or negative effects. This is absurd.
- ❖ **Inadequately tackling the “uneven playing field” in trade, thereby allowing a “race to the bottom” to continue (with apologies for the mixed metaphor).** It is generally acknowledged that there should be a “level playing field” between trading nations, but in fact they have widely differing legal standards (with widely differing standards of enforcement) for sustainability, health and employment. Higher standards normally raise costs, thereby putting producers in those countries at a competitive disadvantage.

⁴³ Pollard, D, *Report of UK survey of gangmaster labour for the European Federation of Agricultural Workers’ Unions (EFA)*. 1998. Rural, Agricultural and Allied Workers’ Trade Group, Transport and General Workers’ Union: London. Cited in Vaughan, A, *Salad Days: The impact of lettuce production and consumption on people and the environment*. 1999. Sustain: London

⁴⁴ Contact the Food and Drink Federation

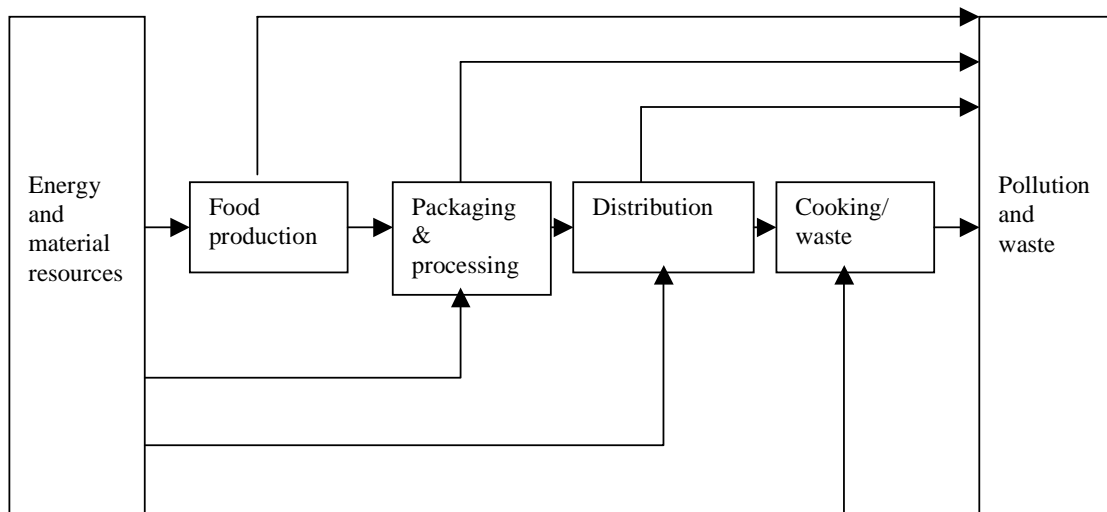
⁴⁵ Science Policy Research Unit, Sussex University

⁴⁶ Answer by Ms Quinn (4 February 2000) to question by Joan Ruddock, MP

One way to solve this problem would be raise standards to a minimum “floor” no trading nation could fall below. Some progress is being made in this area by the **Codex Alimentarius Commission**, established jointly by the Food and Agriculture Organisation and the World Health Organisation to set such standards for world food trade. However, to say progress is **slow and uneven** understates the case, and the Commission itself has been criticised for its secrecy, lack of democratic accountability and the dominance of its institutions by Northern governments and multinational food and agribusiness companies⁴⁷.

A complementary approach is to ensure purchasers are aware of differing standards, for example through **comprehensive labelling**, thereby allowing a more informed choice than is possible by price alone. However, the World Trade Organisation largely prohibits such labelling as a “**technical barrier to trade**”⁴⁸. Faced with an uneven playing field, and obstacles to levelling it, traders are either pushed out of the market or, to stay in it, lower their standards to, or below, those of their competitors – the “race to the bottom”⁴⁹.

A further twist in the Dutch auction is that, to buttress themselves against competition – fair or otherwise – companies sometimes seek economies of scale, and the **market dominance that derives from sheer size**. In so doing, they may help to “level the playing field” – standards within some companies tend to be the same, irrespective of location. However, harmonising standards has, in practice, tended to lead to uniformity e.g. in animal breeding, seed development, and associated applications of agrichemicals and veterinary drugs, thereby exacerbating the problem of dependency on a narrow genetic base for our food supply⁵⁰.



⁴⁷ Avery, N, Drake, M, Lang, T. *Cracking the Codex: An analysis of who sets world food trade standards*. 1993. National Food Alliance. Available from Sustain: London

⁴⁸ WTO. *Food for thought: Farm animal welfare and the WTO*. Undated. Royal Society for the Protection of Animals.

⁴⁹ *Hard boiled reality: Animal welfare friendly egg production in a global market*. 2001. Eurogroup for Animal Welfare/Royal Society for the Protection of Animals: London

⁵⁰ See series of *Food Facts* reports (on potatoes, bread, strawberries, beef, milk, pears, apples, soya, carrots, beer, lettuce, chicken, sugar, oils, and oranges). 1997-2000. SAFE Alliance and Sustain: London

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- ❖ Developing the farming and food sector as a **linear system, with no incentives to internalise costs that are “external”** to that system. The diagram above is a stylised representation of the current food system, demonstrating that inputs such as clean water, soil fertility, land, oil and so forth are treated as infinitely available (which they are not); and that outputs, such as air and water pollution, land degradation, waste etc. can be infinitely absorbed by the environment (which they cannot).

With this model, **food appears to be “cheap”** because the costs of the “external” inputs and outputs are not reflected in the price. This means that the market signals that are sent by purchasing decisions are distorted, giving the appearance that purchasers “want” cheap food, when other indicators (see *Good features to preserve* above) show the situation is more complex.

In a seminal study⁵¹, some of these “external” costs have been calculated; £136 million to clean up water contaminated with pesticides and nitrates; a cost of £169 million to account for losses due to food poisoning; and £607 million as a result of BSE. By comparison, organic farming systems (which are more circular than linear, and which internalise such costs) produce food with a higher price tag, but with only a third of the external costs.

This linear system, which excludes “externalities” has allowed the development of food chains which are long, both in terms of physical distance and in complexity. One effect has been an almost complete lack of contact between food producers and consumers (see below). Another result has been a **dramatic decline in the proportion of profit in the food chain accruing to primary producers**, falling from around 50p in the pound in the 1950s to only about 10p in 2000, further undermining the economic viability of farming.

- ❖ **Failing to develop a coherent farming and food strategy.** It is evident from the systemic market failures outlined above that the mechanisms are not self-correcting and therefore require government intervention. Successive governments, however, have proclaimed themselves either unwilling (due to a desire to “roll back the state”) or unable (due the “inevitability” of trade liberalisation) to develop such a strategy. As a result, much government policy in this area is incoherent or perverse. Just a few examples will suffice.

Less than 10% of Common Agricultural Policy funds are spent on schemes to protect the environment and promote diverse rural economies, and governments are dissuaded from taking full advantage of these European funds, as they have to be matched by national government spending. The UK government, in particular, is among the **lowest spenders on schemes to promote organic farming**⁵², **despite the fact that the UK imports a higher proportion of organic produce**

⁵¹ Pretty, J, et al, *An assessment of the total external costs of UK agriculture 2000*. Agricultural Systems, 65(2), 113-136.

⁵² *A comparison of organic aid rates in the UK and other EU member states*. May 2001. Soil Association: Bristol

than all other EU states for which figures are available⁵³. Moreover, the English government (though not the Welsh or Scottish devolved administrations) continues to resist the introduction of an action plan for the organic sector, an approach to overcoming structural bottlenecks in the sector which many other EU countries have used with some success⁵⁴.

Even when a strategy is developed in a particular area, government has failed to take an holistic approach. For example, the *Free fruit for schools* initiative by the Department of Health, while entirely laudable in its attempt to increase consumption among children, has focused solely on fruit. Scientific opinion is clear that British people should double, approximately, their consumption of fruit and vegetables⁵⁵. The UK currently imports around 95% of its fruit and 50% of vegetables⁵⁶, so **a scheme focusing solely on fruit is likely to worsen this trade deficit**. This is particularly the case as two of the four fruit specified in the scheme – bananas, satsumas, apples and pears – cannot be grown in the UK. At a time when British farming, including horticulture, is in severe crisis, government has just announced an additional £42 million (plus £10 million for community-based schemes, all from lottery funding) for this flawed scheme⁵⁷.

- ❖ **Resistance to change by vested interests.** One explanation of governments' failures to develop coherent alternative to the current farming and food sector is resistance from those who do well from it. Commercial seed, fertiliser and pesticide companies, banks agricultural consultants and some farmers support the current paradigm of "high productivity and highly competitive agricultural practices"⁵⁸. To this must be added manufacturers of fatty, salty and sugary foods and the promotional industries that strive to sell more of these "value-added" but nutritionally pernicious products (see below). Major retailers too, have been criticised for pulling out of low income areas and creating "food deserts", driving local retailers out of business and reducing employment, contributing to environmental damage by creating long, centralised supply chains and car-dependent shopping, and further squeezing the profit margins of farmers who supply them⁵⁹. A recent Competition Commission Inquiry concluded, *inter alia*, that major retailers were also guilty of predatory pricing, but that government was powerless to act⁶⁰.

⁵³ Dabbert, S, Ed, et al, *The European Market for Organic Products: Growth and Development*. 1999. Organic Farming in Europe. Vol 7. Universitat Hohenheim: Germany

⁵⁴ Dabbert, S, Ed, et al, *The European Market for Organic Products: Growth and Development*. 1999. Organic Farming in Europe. Vol 7. Universitat Hohenheim: Germany

⁵⁵ *Nutritional Aspects of Cardiovascular Disease. Report 46*. Committee on the Medical Aspects of Food and Nutrition Policy, 1994, Department of Health.

⁵⁶ Jones, A, *Eating Oil: Food supply in a changing climate*. In press. Sustain: London

⁵⁷ *Extra £52 million for children's school fruit and five a day schemes*, 5 October 2001, Department of Health press release 2001/0462

⁵⁸ Stockdale, E, Lampkin, N, Hovi, M, Keatinge, R, Lennartsson, E, Macdonald, D, Padel, S, Wolfe, M, Watson, C, *Agronomic and environmental implications of organic farming systems*, *Advances in Agronomy*, Vol 70, pp261-327, Academic Press, 2001

⁵⁹ Hawkes, C, Hird, V, Rankine, K, Webster, J, *A battle in store? A discussion of the social impact of the major UK supermarkets*. 2000. Sustain: London

⁶⁰ Competition Commission. *Supermarkets: A report on the supply of groceries from multiple stores in the UK. Vol I, II, and III*. 2000. Competition Commission: London

- ❖ **Citizens left prey to misleading and exploitative marketing.** In the market system consumer demands are said to be paramount. However, for this system to operate efficiently on its own terms, citizens must have the necessary education, skills and information to make rational choices, i.e. that meet people's needs. Without these conditions, incorrect market signals will be transmitted via purchasing decisions that do not, in fact, meet citizens' requirements, and this fairly describes the current situation.

It is widely agreed that children can and do leave school with inadequate food knowledge and skills⁶¹. The difficulties faced by ill-prepared shoppers are compounded by **food labelling which is incomplete, often incomprehensible and frequently misleading**⁶². An unacceptable situation is intensified by well-funded marketing campaigns (£616 million in 1999 alone⁶³) usually for fatty and/or sugary and/or salty food, often targeted directly at **children⁶⁴ who are most vulnerable to exploitative advertising⁶⁵**. This affects not only children's food purchasing patterns, but also their families⁶⁶. **The pressure to buy more expensive branded goods hits low income families hardest⁶⁷**.

In short, consumer demand can be and is manipulated. The key elements are to make a product:

- **affordable.** This is not necessarily the lowest possible price to the final consumer. However, if prices to primary producers are kept as low as possible, this allows flexibility further up the food chain for price promotions, special offers and so forth.
- **available.** Constant supplies are essential to avoid losing potential sales, so the seasonality inherent in UK farm production becomes a liability.
- **attractive.** High profile, big budget, year-round marketing promotions ensure that "value-added" products such as potato crisps are profitable, while potato farmers, with next to no budget, suffer along with the rest of British farming.

At present, these elements are used to reinforce the negative consequences of the current system, but they could be used, instead, to drive the kinds of positive changes that are outlined in the final section of this paper.

Factors driving the good aspects include:

- ❖ **Changes in consumer demand.** It is in the nature of consumer demand that it is complex, often contradictory, changes over time and is dependent on context. The search for the "real" views of "the" consumer are therefore doomed to fail. Just as the factors described above can lead people to drive bad aspects of the sector,

⁶¹ *Children's cooking skills*. 1993. MORI research for the National Food Alliance. Available from Sustain: London.

⁶² *The Lie of the Label: A report calling for honest labelling*. 1997. The Co-operative Wholesale Society: Manchester

⁶³ *Advertising Statistics Yearbook 2000*, The Advertising Association, London

⁶⁴ Dibb, S, Gordon, S, Powell, C, Tull, K *TV dinners – what's being served up by the advertisers?* 2001, Sustain: London

⁶⁵ *Children and Advertising*. BEUC/Consumentenbond. 1996. BEUC: Brussels

⁶⁶ *Blackmail: The first in a series of inquiries into consumer concerns about the ethics of modern food production and advertising*. 2000. Co-operative Wholesale Society: Manchester

⁶⁷ Johnson, V, Webster, J *Reaching the parts... Community mapping: Working together to tackle social exclusion and food poverty*. 2000, Sustain: London

other factors can encourage people to drive good aspects (see *Good features to preserve* above).

- ❖ **The series of food crises.** Ironically, one of the factors driving people to seek food that is sustainable, healthy and supportive of livelihoods, is the seemingly endless series of food crises over the last two decades or so. Salmonella in eggs, BSE, E.coli 0157, GM food, and foot and mouth disease - to name but a few – have all demonstrated in dramatic fashion the profound flaws in the current farming and food sector. The situation has already allowed significant **political and institutional changes** e.g. the establishment of the Food Standards Agency, and the abolition of the Ministry of Agriculture Fisheries and Food. Given the groundswell of popular concern, **further changes are both necessary and possible.**

- ❖ Demand for traceability. Another silver lining to the cloud of food crises has been an increasing **demand for, and technical possibility of full traceability** throughout the food chain. This is demanded both by final consumers and by the farming and food sector itself. The former continue to insist on their right to choose between products of difference provenance and from different production systems. The latter need to meet, and be seen to meet specifications from intermediate buyers, demonstrate “due diligence” as part of protecting their liability under food law, and recall products if the need arises. Some of this demand is being met by technical means (e.g. DNA tracing and electronic tagging) while others consider that **shortening and simplifying the food chain** e.g. by using local suppliers, not only eases traceability but has other advantages (see *What can be done to make things better* below).

- ❖ **Flexibility and power of retailers.** While major retailers have been criticised, *inter alia*, for their negative effects on low income communities, farmers, local employment and the environment they have some key advantages over other parts of the food chain which allow them to respond more flexibly to pressures for change. First, **they have no particular attachment to the type of food they sell** since, by and large, they do not produce it. Animal or vegetable, local or global, organic or conventional is of little consequence to major retailers, so long as their customers can be persuaded to buy it from them, rather than their competitors. Thus, of late, retailers have been engaging in activities to encourage fruit and vegetable consumption⁶⁸, exploring buying a higher proportion of their produce from local suppliers⁶⁹, and rapidly increasing the proportion of organic products in their stores⁷⁰. While these initiatives are not unproblematic (some are little more than public relations exercises, while others may be undermining the diversity of local retailing)⁷¹ they do demonstrate major retailers’ **sensitivity to public opinion and their willingness to respond** to, rather than ignore it.

⁶⁸ Examples include Asda’s The Big Eat project, Sainsbury’s leaflets with the British Dietetic Association, Tesco’s support for the Imperial Cancer Research Fund, and Waitrose funding for the Horticultural Development Council.

⁶⁹ *Local sourcing: PR or the real thing?*, Sustain internal document, 2000

⁷⁰ *Organic Food and Farming Report 2000*. Soil Association: Bristol

⁷¹ Petts, J, *Economic costs and benefits of urban agriculture in East London*, 2001. Unpublished, Sustain: London

Second, the major retailers play a **powerful role in the farming and food sector**⁷². When they change their policy on an issue, the effects are felt along the length of the food chain. So far, in terms of sustainability, health and livelihoods, their impact has been, at best, mixed and, at worst, largely negative. It does not appear, however, that there are insuperable obstacles to changing this situation.

- ❖ **Resilience of organic sector and other alternative approaches.** Despite the long list of factors, listed above, that are driving the farming and food sector in a negative direction some business and citizens' organisations have persisted in the development of the theory and practice of different and more positive approaches. In the face of government neglect, outright opposition from some other parts of the sector, and occasional public indifference, these groups have continued to inspire and innovate. This provides a solid foundation for the future.

4. WHAT CAN BE DONE TO MAKE THINGS BETTER A) IN THE SHORT-TERM AND B) IN THE MEDIUM TO LONG-TERM?

These proposals have not been classified as either short, or medium to long-term, as the judgement about what is possible, and within what timescale, is essentially political and subject to change. Rather than second guess what the Commission, or indeed the Government, may regard as feasible, what follows simply attempts to address the *Problems to tackle* along with some of the factors driving these problems, as outlined above:

- ❖ **Mechanisms need to be established** (or existing mechanisms modified) **to pursue the Commission's recommendations** immediately after it has been wound up. An integrated approach to sustainability, health and livelihoods has, thus far, been missing and is, in Sustain's view, vital to avoid contradictions, incoherence and crises in future. Arguably, it is too soon to assess whether the new Department of Environment, Food and Rural Affairs could assume this function. Some have argued for the establishment of a National Food Policy Council, and similar bodies at regional and local level, as these have been successful in several Scandinavian countries⁷³. These could have a cross-sector membership and "arm's-length" relationship from government that, by definition, a government department could not. Another possibility is that the Commission on Sustainable Development could take on this role. In the immediate aftermath of the Commission, it may be necessary to establish temporary or transitional mechanisms. Sustain is clear, however, that such mechanisms are essential.
- ❖ **Major and sustained investment is required in the home production of fruit and vegetables for domestic consumption.** This programme should be accompanied by similar level of investment in promoting fruit and vegetable consumption, particularly to low income groups. Experience in Finland⁷⁴ indicates that this could create jobs as well as improve health. For environmental reasons (and to reduce health risks to farm workers – from applying biocides - and

⁷² Hawkes, C, Hird, V, Rankine, K, Webster, J, *A battle in store? A discussion of the social impact of the major UK supermarkets*. 2000. Sustain: London

⁷³ Lang, T. *Intersectoral Food and Nutrition Policy Development: A Manual for Decision Makers*. 2001. Centre for Food Policy. Thames Valley University.

⁷⁴ *Nutrition in Finland*. 2000. National Public Health Institute: Helsinki. www.helsinki.fi

to consumers – from eating “cocktails” of residues), targets should be set for existing growers to convert to organic methods⁷⁵, and new entrants should consider being organic from the start⁷⁶.

Cosmetic standards for fresh produce, set either by the European Commission or retailers should be abandoned in favour of a focus on nutritional quality and biodiversity⁷⁷.

- ❖ **Budget standards**, which are used successfully in countries such as Australia and Sweden, **should be used as the basis for setting benefit/tax credit levels**, so that healthy food is affordable to everyone.⁷⁸
- ❖ **Catering funded by the public sector**, whether or not provided by it, **should be used to pursue public policy on sustainability, health and livelihoods**. Thus, food should be supplied by local producers, to high nutrition and microbiological safety standards (particularly for nutritionally vulnerable groups such as children, elderly people⁷⁹ and those suffering from illness), and produced organically. Such initiatives have been successfully introduced in France and Italy, and are developing in the UK⁸⁰. Moreover, Belfast City Council’s policy report *Sustainable Procurement in a Regulated Environment*,⁸¹ and subsequent practice has demonstrated that changes to EU and national rules on public procurement contracts, though helpful in the longer term, may not be needed immediately. What will certainly be needed is increased funding for public sector catering contracts.
- ❖ **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 transport⁸²). This should reduce oil consumption (and associated environmental damage) and increase incentives to locate food production as near as possible to consumers⁸³, thereby increasing employment in local farming and food industries⁸⁴.

⁷⁵ Fookes, C, *Outline Organic Action Plan for England and Wales: A discussion document*. 2001. Organic Targets Campaign, Sustain: London.

⁷⁶ See research and information services provided by Elm Farm Research Centre (www.efrc.com) and HDRA – the Organic Organisation (www.hdra.org.uk)

⁷⁷ *Green and Pleasant Land: How hungry are we for safe, sustainable food?* 2001. The Co-operative Group: Manchester

⁷⁸ Family Budget Unit, *Low Cost but Acceptable: A minimum income standard for the UK: Families with young children*. 1998. The Policy Press: Bristol. Cited in Webb, A, *Food Poverty: Policy options for the new Millennium*, in press, Sustain: London

⁷⁹ See the series of nutritional guidelines for catering for vulnerable groups produced by the Caroline Walker Trust. www.cwt.org.uk

⁸⁰ *Good food for all. Proceedings of a conference, Reading, May 2001*. East Anglia Food Links: Norfolk. See also Sustain working paper on Public Procurement. Unpublished, 2001.

⁸¹ Cited in Newsletter 4, August 2000. Powys Food Futures, Soil Association: Bristol

⁸² Jones, A, *Eating Oil: Food supply in a changing climate*. In press. Sustain: London

⁸³ *A sustainable food supply chain*. Report 4966. 1999. Swedish Environmental Protection Agency: Stockholm.

⁸⁴ *Plugging the leaks*. 2001. New Economics Foundation: London

- ❖ Consumer, environmental and other public interest organisations should be involved in **improving the content and implementation of the Office of Fair Trading Code of Practice between supermarkets and their suppliers**⁸⁵. This would help address the 27 practices which the Competition Commission found operating “against the public interest” in its inquiry. Predatory pricing should be made illegal, as it has been in Spain (1996 Trade Law Regulations), France (1997 Loi Galland), Ireland and several States in North America⁸⁶.
- ❖ **The use of antibiotics as growth promoters in animal production should be prohibited immediately** and routine prophylactic use should be phased out as soon as possible.⁸⁷ Experience from Sweden shows that this is entirely feasible⁸⁸. Antibiotics to treat sick animals should be used under veterinary supervision only. This would reduce the incidence of antibiotic resistance in humans and allow food poisoning cases to be more effectively treated. It would also require much improved animal welfare standards, as an alternative method of preventing illness in livestock. It is possible (though not inevitable⁸⁹) that these proposals would increase the cost of meat and dairy production to the point where demand declines. This is likely to be beneficial for human health⁹⁰ and for the environment⁹¹. Jobs lost in this sector should be absorbed by new employment opportunities in horticulture (see above), and by adding value at the farm end of the food chain.
- ❖ **All farm and food premises, and the key food handlers who work in them, should be licensed** before they can operate, and regularly checked thereafter⁹². This should ensure that farm and food workers are adequately trained in the principles of Hazard Analysis and Critical Control Points (the internationally accepted approach to improving food safety), that premises are suitable for food preparation and that, as a consequence, the incidence of microbiological contamination of food declines. However, it is important, particularly for small and specialist businesses that the process of licensing should avoid burdensome paperwork.

⁸⁵ Competition Commission. *Supermarkets: A report on the supply of groceries from multiple stores in the UK. Vol I, II, and III.* 2000. Competition Commission: London

⁸⁶ Laws cited in submission to the Commission by the National Federation of Women’s Institutes and by Caroline Cranbrook

⁸⁷ Young, R, Craig, A, *Too hard to swallow - the truth about drugs and poultry: The use and misuse of antibiotics in agriculture.* 2001. Soil Association: Bristol

⁸⁸ *Today we defeat bacteria. What about tomorrow? Documentation from a conference in Brussels, 13 November 1997.* Ministry of Agriculture Food and Fisheries, Sweden: Stockholm

⁸⁹ See submission to the Commission by Compassion in World Farming

⁹⁰ See World Cancer Research Fund on the links between meat consumption and cancer (www.wcrf.org), British Heart Foundation Health Promotion Research Group on the links between animal/saturated fat consumption and cardiovascular diseases (www.heartstats.org) and World Health Organisation on links between meat as a source of food poisoning (WHO surveillance programme for control of foodborne infections and intoxications. 7th report – 1993-98. UK, England and Wales)

⁹¹ Secretary of State (Margaret Beckett)’s speech, 24 October 2001, to Green Alliance and ERM. See also submission to the Commission from the Royal Society for the Protection of Birds on dairy farming as most polluting industry, and submission by Elm Farm Research Centre on methane’s contribution to global warming.

⁹² This is the policy of Consumers Association, the Chartered Institute for Environmental Health and the Local Authorities Co-ordinating body on food and Trading Standards.

There is a delicate balance to be struck, however, between ensuring food is safe (which is desirable) and producing food which is sterile (which is not desirable). Evidence is accumulating that diseases of the immune system, such as asthma, may be increasing because of the failure to expose ourselves (from food and other sources) to non-lethal doses of bacteria⁹³. Much more **research** needs to be undertaken **into how people acquire and maintain robust immune systems**.

- ❖ Long distance transport of live animals should be prohibited⁹⁴. This alone would be a major step towards **improving animal welfare**. Investment in infrastructure such as abattoirs, coupled with disincentives for oil-based transport (see above) should further encourage a localised food chain where meat is consumed as close as possible to where animals were reared. Reduced stocking densities, opportunities to display natural behaviour, and less mixing between animals from different groups (as in organic systems) should further improve animal welfare, reduce the risk of diseases, and limit the spread of those diseases (including zoonoses) when they occur. Additional investment, including research, into traditional and rare breeds of animals may reveal beneficial traits such as disease resistance and nutritional benefits for humans⁹⁵. Reintroducing such breeds should further reduce the spread of disease through genetically similar (or identical) stock.
- ❖ **Fiscal measures (such as taxes and tax-breaks) should be introduced to discourage the use of biocides⁹⁶**, artificial fertilisers and non-essential veterinary drugs, and to encourage the preservation and reintroduction of wildlife-friendly features such as hedges and headlands⁹⁷. More research and investment is required to increase the number of varieties of cereals that can be grown domestically, that have both nutritional and environmental benefits.
- ❖ Fiscal measures (such as taxes and tax-breaks) should also be introduced (or, in the case of landfill tax, enhanced) to **encourage the sector to reduce the amount of waste it produces**, re-use what cannot be eliminated⁹⁸, and recycle what cannot be re-used. Recycling compostable waste is particularly important for returning nutrients to the farming and food system which are currently inappropriately treated and become a source of pollution⁹⁹.
- ❖ **A five year moratorium**, at UK and EU level, **should be introduced on growing GM crops** for any commercial purpose, importing GM crops, and patenting genetic resources. In that five year breathing space government should fund research into the impact of this technology on health, the environment, animal

⁹³ *How bogus hygiene regulations are killing real food*. June 2001. The Ecologist Report: London

⁹⁴ See submission to the Commission by Compassion in World Farming

⁹⁵ Crawford, M A, *Fat animals – fat people*. July-August 1991. *World Health*.

⁹⁶ *Pesticide risk reduction in Sweden*. Presentation by Peter Bergkvist at Pesticides Action Network (PAN) Europe meeting, Hamburg, 1999. PAN, UK : London

⁹⁷ Lowe, P, Buller, H, Ward, N, *Setting the next agenda? British and French approaches to the second pillar of the Common Agricultural Policy*. Working paper 53, 2001. University of Newcastle, Centre for Rural Economy.

⁹⁸ As, for example, with the Danish system for reusing glass containers.

⁹⁹ See also submission to the Commission from the Royal Society for the Protection of Birds on dairy farming as most polluting industry, and submission by Elm Farm Research Centre on methane's contribution to global warming.

welfare, consumer choice and the economic viability of all types of farming¹⁰⁰. Government should also accept the conclusions of its advisory body, the Agriculture and Environment Biotechnology Commission, and institute a broader and deeper public consultation exercise about GM food and farming¹⁰¹.

- ❖ Most of the measures outlined above would be facilitated by the adoption, by government, of **an organic action plan with a target**¹⁰² (of 30% of agricultural land to be organic by 2010). It would help the organic sector grow without the damaging boom and bust economic cycle so often seen in British farming. It would also put UK farmers on a level playing field with the rest of the EU, helping to reduce the high level of organic imports, as well as ensuring that the organic sector delivers the maximum amount of environmental, health and social goods.
- ❖ **The Food Standards Agency should provide financial and legal support for improved food law enforcement.** Current proposals include a “fighting fund” for legal test cases, introducing improvement/prohibition notices for food labelling offences¹⁰³, and higher fines for those found guilty of food law infringements. Additional funding will be required to recruit, train and retain additional food law enforcement officer to take on the additional work entailed in more vigorous food law enforcement and to implement the licensing system proposed above.
- ❖ **The UK Government should increase its support for fair trade.** More funding and technical assistance is needed so that Southern countries can raise their health, employment and sustainability standards in food production. Having done so, fresh and processed foods from the South should be allowed access to Northern markets.¹⁰⁴
- ❖ **To help the farming and food sector attract and retain good quality employees,** the UK Government should increase the minimum wage¹⁰⁵ and ensure a wide range of high quality training courses are available, including in nutrition¹⁰⁶, conservation, farming, and marketing as well as food hygiene. Much of this training will be privately provided, but government has a responsibility ensure high standards, and to provide funding for, e.g., unemployed, older or low skilled workers, to ease the transition into better quality jobs.
- ❖ **The balance of publicly funded research should be shifted** out of areas underpinning the current farming and food sector and into areas that show greater promise in terms of their contribution to sustainability, health and livelihoods.

¹⁰⁰ *GM food – the Government’s record*, 2001. Five Year Freeze: London

¹⁰¹ *Crops on Trial*, Agriculture and Environment Biotechnology Commission, September 2001

¹⁰² Fookes, C, *Outline Organic Action Plan for England and Wales: A discussion document*. 2001. Organic Targets Campaign, Sustain: London.

¹⁰³ *Enforcement Options in Food Standards Enforcement*. 2001. Unpublished submission to the Food Standards Agency by the Local Authority Co-ordinating body on food and Trading Standards (LACOTS): London

¹⁰⁴ Vaughan, A, *Sugar, trade and Europe: A discussion paper on the impact of European sugar policies on poor countries*. 2000. Sustain: London

¹⁰⁵ Boyle, M. *Winners and Losers: The National Minimum Wage in Tyne and Wear – the experience of CAB clients*, 2000, NACAB: Newcastle

¹⁰⁶ Food Standards Agency conference, February 2001 on nutrition standards in catering.

Some of these areas are covered elsewhere in this submission. Overall, governments should increase public funding for research in the farming and food sector, and ensure that the results are widely publicised.

- ❖ The UK Government should continue to take the lead in the EU, and in negotiations with relevant international institutions, to **insist on citizens' right to compulsory, comprehensive and comprehensible food labelling**. This includes not only ingredients, nutrition and food safety information, and origins (which could also usefully incorporate details about the environmental impact of transport methods¹⁰⁷), but also processing and production methods. It is helpful that the World Trade Organisation has recently overturned its previous two decisions, in the *shrimp-turtle* case, so that countries may indeed specify food methods that, say, protect wildlife so long as these are not applied in a discriminatory manner¹⁰⁸.
- ❖ Legal controls, with realistic fines for those violating the law, should replace the current voluntary approach to regulating food advertising and marketing (including advertising on the internet, which is effectively unregulated). The UK Government should follow Sweden's lead¹⁰⁹ and **introduce legislation to protect children from advertising and promotions**, targeted directly at children, which promote foods that contribute to an unhealthy diet. These include confectionery, crisps, savoury snacks, soft drinks and other processed products containing high levels of fat, sugar or salt, excessive consumption of which is known to be detrimental to children's health¹¹⁰.
- ❖ Government should place **a duty on all educational institutions to introduce**, as part of a sustainable development policy, **an integrated food policy**. For children this is known as the "whole school" approach and has been introduced in many UK schools by Schools Nutrition Action Groups which bring together teachers, pupils, parents, caterers, and relevant professionals. Together these groups plan and introduce food education and skills (including cooking and growing) across the curriculum, which is then complemented by the food provided in tuck shops, school meals, breakfast clubs and so on¹¹¹.

Suitably modified, the same approach should be used for food policies in all educational institutions, since if teachers, health professionals and other relevant actors in society do not have an adequate food education, they can scarcely be expected to educate others.

- ❖ Government should play a leading role in **reforming international institutions** such as the Common Agricultural Policy (CAP), the Codex Alimentarius Commission (Codex) and World Trade Organisation (WTO), **such that trade is**

¹⁰⁷ Jones, A, *Eating Oil: Food supply in a changing climate*. In press. Sustain: London

¹⁰⁸ See submission to the Commission by Compassion in World Farming

¹⁰⁹ Dibb, S. *A spoonful of sugar - Television advertising aimed at children: An international comparative study*. 1996. Consumers International: London

¹¹⁰ Dalmeny, K. *Children's Nutrition Action Plan: Policy recommendations to improve children's diets and health*. 2001. The Food Commission: London

¹¹¹ *The chips are down: A guide to food policy in schools*. 2000, Health Education Trust and The Design.Dimension Educational Trust

subordinated to the need for sustainability, health and livelihoods. In addition:

- Codex should provide funds to ensure that Southern countries and citizens' organisations can participate in international negotiations, insist that members of committees publicly declare all relevant financial interests, and allow access to Commission meetings by citizens' organisations.
- CAP should phase out price support and export subsidies, expanding instead funding for whole farm management systems which, as a condition of funding, enrich the environment, raise animal welfare standards, produce safe, healthy and diverse food supplies and regenerate the rural economy. In particular, the Rural Development Regulation must be given adequate funding (from the Treasury, modulation, and innovative co-financing opportunities) to finance the redesign of agricultural support.

January 2002

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 principles outlined in answer to the Commission's first question on what citizens should expect of the countryside, farming and food sector.

Allergy Alliance
Arid Lands Initiative
Baby Milk Action
Biodynamic Agricultural Association
British Heart Foundation Health Promotion Research Group
Centre for Food Policy
Compassion in World Farming
Ecological Foundation
Faculty of Public Health Medicine of the Royal College of Physicians
Food Additives Campaign Team
Food Commission
Foundation for Local Food Initiatives
Guild of Food Writers
Health Education Trust
Henry Doubleday Research Association
HUSH: The UK E. Coli Support Group
Hyperactive Children's Support Group
Land Heritage
National Council of Women
National Federation of Consumer Groups
National Federation of Women's Institutes
National Heart Forum
Pesticides Action Network, UK
Unison
World-wide Workers on Organic Farms
VEGA Research
Women's Environmental Network

List correct as of December 2001