

**SUSTAIN’S RESPONSE TO ‘Sustainable Food and Farming – Working Together’
THE CONSULTATION DOCUMENT FROM
THE DEPARTMENT FOR ENVIRONMENT, FOOD AND RURAL AFFAIRS**

Introductory remarks

As a large alliance¹ representing the whole range of stakeholders concerned with food and farming, we welcome the chance to comment on the proposals by DEFRA for taking forward the recommendations of the Policy Commission on the Future of Farming and Food. We believe that the existence of such an alliance should indicate to DEFRA how seriously non-governmental organisations are taking the idea of an integrated approach to food and farming.

In this response we have provided comment only where the alliance or its membership already have an agreed position and where a comment from such a broad grouping would add value to comments likely to be sent by individual members.

We have also been asked by our membership to comment on the issue of international trade and competitiveness, which is not a specific question in the consultation document. 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 describe below 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.

It is generally acknowledged that a “level playing field” between trading nations would enhance the possibilities of trade having a positive effect on the quality of life. In reality, countries 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. Sustain recommends that government face these difficult issues head on, rather than continue with the fiction that it is possible both to raise standards domestically and compete successfully in an imperfect global market.

What we can provide

Sustain is keen to contribute to the process of developing a farming and food strategy for England. We have been disappointed to see that Sustain has not been invited to most discussions on the Policy Commission report at Departmental and Cabinet level. This has been a missed opportunity for government to benefit from the long experience and broad understanding we have developed in finding solutions to the problems of the current UK food and farming system. As the Sustainable Development Commission pointed out, Sustain was one of only two submissions to the Policy Commission consultation that adequately covered the issues and we recommend that you read our original submission in full.² However, we reproduce here the fundamental principles on which both this submission, and our response to the Policy Commission are based, to illustrate our “joined up” approach:

¹ 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.

² It is available on our website on <http://www.sustainweb.org/pdf/curry.pdf>

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. A resilient farming and food sector should provide:

- ❖ Sustainability, by which we mean, in Brundtland’s definition³, 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 definition⁴, 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, by encouraging anti-biotic resistance, 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 illnesses⁵. (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.

³World 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,

⁴*Health21 – Health for All in the 21st Century*; 1999, World Health Organisation Regional Office for Europe

⁵*Why health is the key to farming and food*. Centre for Food Policy et al. 2002. Available on www.foodpolicy.co.uk

❖ **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.

At the end of the document is a list of those among Sustain's membership who wish, explicitly, to endorse these principles.

RESPONSES TO SPECIFIC QUESTIONS

Farming and the Food Chain

4.7 A new Agricultural Development Scheme (ADS) could target co-operation among primary producers, assurance schemes, benchmarking and spread of best practice and improve marketing. Are these the right targets?

We believe such targets for the ADS are appropriate but would insist that criteria for eligibility for any grants should be based on environmental, nutrition, rural development and animal welfare objectives (as appropriate). As a minimum, all projects should be able to identify goals for improvements in these areas as a result of the projects for which they are applying.

4.8 What practical steps can the food and farming industry, working with regional partners, take to increase the levels of collaboration and co-operation?

Robust co-operation between small operators in the farming and food system is vital, to redress the serious imbalance between disparate, small suppliers, and very large firms in other parts of the system. Practical steps to increase collaboration and co-operation should include: a level of cross-fertilisation between different players in the food chain through secondments and site visits; and regional workshops (with some seed funding from regional or national government). These could be facilitated by a range of community-based initiatives such as regional and local food links groups, NFU branches or regional food groups.

4.9 Which aspects of the food chain should the Food Chain Centre target in order to have the most impact in increasing efficiency?

We believe that the emphasis of the food chain should not be to increase efficiency *per se* but to optimise efficiency in terms of use of the available local capital, which includes natural capital, labour, and knowledge. It would be entirely wrong for the Food Chain Centre to concentrate its efforts at improving narrowly defined economic efficiency within the food chain, while DEFRA and others such as the non-governmental sector, research institutes and parts of industry work to

improve the sustainability of the farming and food system. One priority must be to clarify the situation for each sector, so that we know the external and internal costs involved in each part of the food chain and whether these are being adequately addressed to ensure a sustainable food supply. This work should also highlight how the problem of food miles within the UK can be addressed through shorter food chains and more regional and local marketing patterns.⁶

4.10 *What more should be done by business and Government to expand the range and market share of value added, niche, regional, local or specialist products?*

We consider a focus on “niche” products is limiting and misleading. For the reasons explained throughout this submission, if the farming and food system is to become sustainable, products produced by such systems must become mainstream. As this is a crucial area we would suggest that DEFRA and the Food Chain Centre makes every effort to look at existing initiatives which are adding value but which also base their work on sustainable development objectives. Sustain, through its Sustainable Food Chains project and the Food Poverty Network would be happy to provide contacts and facilitate exchanges.

Significant support is urgently required for the fledgling local food sector which needs assistance, advice, incentives (including tax breaks/rate relief) and national and local government backing in order to overcome the problems resulting from being relatively small, new and often community (and therefore voluntarily based) initiatives. The objectives of such enterprises also generally go beyond the purely commercial but embrace social, health and sustainability goals.⁷

One priority area for action must be improving the availability of local or regional processing facilities, such as abattoirs, cutting plants, and part-processing facilities, for producers so that they can supply local or regional markets.

On local marketing systems, although the Policy Commission report states “*the time has come for locality food marketing...*” it unfortunately did not recommend any direct or additional support for specialist retail outlets for local food such as farm shops and farmers’ markets. The Farmers’ Market movement has proved to be one of the few agricultural success stories of the past four years. Since 1997 the number of markets has increased from one to around 350. They are now supporting between 5,000 and 10,000 small and medium sized producers who wish to cut out the middleman and sell direct to the public. Only a small amount of government support would be required to set up more markets or help producers to diversify into other forms of direct sales such as box schemes and farm shops. However, the National Association of Farmers’ Markets, which has responsibility for the protection, support and promotion of genuine Farmers’ Markets would not exist without the support of the Countryside Agency. The financial support of the CA is diminishing rather than increasing as it was based on estimations made for the sector in 1998. The current staff of two is responsible for over 220 markets and the demands from food producers, government bodies and the public are increasing dramatically. Clearly, additional assistance is needed.

We also ask government to provide financial and other support for initiatives - national and local - to make public procurement of food contribute to sustainable food systems. The development of local food distribution networks can be encouraged by the ‘critical mass’ of purchasing that public bodies like schools and hospitals can deliver. Crucially, and contrary to widespread belief, such purchasing objectives can work within the current Best Value requirements. We urge the

⁶ *Eating Oil: Food Supply in a changing climate*, Sustain 2001

⁷ see reports of the Soil Association, and see *Eating Oil: food supply in a changing climate*, Sustain, 2001

Government to put food high on the agenda of the interdepartmental Sustainable Procurement Group. We have developed a series of briefings on these issues, which you may find helpful in highlighting the benefits of sustainable food chains, the legal aspects of procurement and best practice examples and guidelines.⁸

Finally, if the Countryside Agency is to disengage with the *Eat The View* initiative, as recommended by the Policy Commission, we would strongly urge the government to take it into DEFRA in order to realise its original aims and maintain the vital funding of many of the initiatives which it supports, particularly those working with communities and businesses promoting local, as opposed to locality, food. Government needs to set a clear remit for Regional Development Agencies (RDAs) in devising a regional food economy strategy that encompasses environmental, social, health and fair trade goals, as well as economic development, and we would fully support such a move. RDAs should consider how to overcome problems of distribution and availability of food processing capacity within their regional economic strategies and seek to encourage the networking and planning that are necessary for the development of these initiatives.

Improving the performance of Farmers and Land Managers

4.21 What can farmers and others do to reduce the number of deaths and serious injuries due to accidents on farms?

Given the growing body of evidence on the chronic effects of chemicals used on farm, particularly organophosphates, we would add chronic diseases to the list of problems to be addressed.

It could be argued that one of the underlying causes for farmer and worker problems in this area is the increasing pressure to reduce variable costs, particularly labour, in response to lower primary produce prices. Until farmers are able to gain a sufficient return for their efforts both to produce food and other goods not rewarded by the market, such health and safety problems will continue. More immediate measures, such as on farm inspections, must be implemented immediately to tackle the high levels of farm based injury and fatalities.

4.25 How should an agricultural research Priorities Board be constituted, led and supported? What range of research programmes should such a Board address?

Considerable funding is put into basic research supporting conventional production, particularly livestock and arable farming. A small part of this will be useful for farmers practicing more sustainable techniques such as organic farmers. However the balance is currently wrong. For example, research into GM food (which attracts no discernible consumer demand, but considerable commercial support) absorbed some £27 million of government funding last year. Research into organic systems (where there is chronic under-supply for the current demand) received a mere £2 million⁹.

We believe that new criteria for publicly funded research (which includes LINK projects) should be based on efficiency in relation to environmental, public and worker health, nutrition, animal welfare and sustainable development. We have long since passed the point where we need to push yields any higher in the UK. So re-emphasis of public research on more sustainable production so that it delivers these efficiencies must be the priority. To ensure this occurs, citizen groups with expertise

⁸ These are available on our website at http://www.sustainweb.org/chain_index.shtml

⁹ Answer by Ms Quinn (4 February 2000) to question by Joan Ruddock, MP

in health, environmental sustainability and animal welfare should be represented on the Priorities Board.

Resource Protection

4.34 *Can a clear and measurable description of good farming practice be established to enable farmers to understand and meet environmental objectives?*

A description of good agricultural practice (GAP) can and must be established and developed. As new research gives insight into best practice and interrelationships between the different functions on the farm, the GAP guidelines should develop and evolve. Moreover, suitably adapted good practice guidelines should be extended to cover the whole food industry (including the food service sectors, processing, retailing, transport, and R& D). There is no justification for requiring farmers to reach higher standards of environmental sustainability than other parts of the food chain.

4.35 *What additional measures (e.g. advice and guidance, incentive mechanisms, regulation, economic instruments) are needed to improve resource protection in agriculture? How should these instruments be used together to achieve the scale of improvement to the environment needed, both in the short and long term?*

We would advocate the maximum effort be put into testing new approaches to farm support for natural resource protection through a ‘broad and shallow’ scheme, for example: additional measures for sensitive areas such as flood plains; advice which is tailored to both farmers’ and workers’ needs; and assistance for transport costs to training and demonstration sites. We have always been in favour of approaches which are both ‘whole farm’ and which allow consideration of the whole catchment area through coordination of farmer exchanges, partnership applications for capital grants, and so forth. For natural resource protection this is clearly vital and a number of initiatives exists which we can draw on for best practice guidance.¹⁰

To combat climate change, 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 transport¹¹). This should reduce oil consumption (and associated environmental damage) and increase incentives to locate food production as near as possible to consumers¹², thereby increasing employment in local farming and food industries¹³.

4.36 *The Policy Commission put particular weight on the case for new “broad and shallow” agri-environmental scheme. What contribution might this be expected to play in reducing the negative environmental effects of farming?*

See above. We advocate the concept of a system of basic, area based payments for all land based food production, which are decoupled from specific crops/breeds and conditional on environmental, public health and animal welfare criteria. There may be a need to consider assistance to farmers on initial application to the scheme and for differential levels of payment related to sectors such as organic (recognising the considerable benefits provided by the organic system), horticultural or

¹⁰ Rural partnerships, SAFE Alliance 1996, also contact the Countryside Agency about the integrated Land Management Initiatives http://www.countryside.gov.uk/farming/farming_04.htm

¹¹ Jones, A, *Eating Oil: Food supply in a changing climate*. 2001. Sustain: London

¹² *A sustainable food supply chain*. Report 4966. 1999. Swedish Environmental Protection Agency: Stockholm.

¹³ *Plugging the leaks*. 2001. New Economics Foundation: London

some livestock sectors, which are based on small areas. Such a scheme has the potential to contribute to natural resource protection as long as it is adequately funded, monitored and enforced. Safeguards need to be in place to ensure small and medium sized farm businesses do not find themselves without adequate support during the transition phase.

4.37 *What contribution can food consumers and retailers make to encourage resource protection, for example through labelling? How far are incentives needed to promote a stronger focus on the environment by consumers? How can assurance best play a role in this area?*

We hope that the government will include all sectors of the food chain, including food processors, supply companies and the food service (catering) sectors, in the resource protection strategy as these actors exert considerable influence up and down stream of their operations and control a significant part of the food system itself. There should be coherence between the DEFRA standards and those being developed by the industry and encouragement for the whole industry to develop assurance schemes.

On incentives, our proposals elsewhere in this submission to use fiscal measures to internalise costs which are currently external to the farming and food system (e.g. fuel taxes) should have the effect of increasing the prices of unsustainably produced food products relative to sustainable equivalents. If the fiscal system were designed such that prices accurately reflected environmental costs, sustainably produced food would be cheaper, thereby providing an incentive for people to act on the environmental preferences they repeatedly express.

Please see our answer to question 4.80 for proposals on food labelling.

Reform of the CAP and targeting subsidies to promote sustainability.

4.42 *What steps should be taken to ensure significant reform of the CAP (particularly shifting funding from the CAP's first to second pillars) in the 2002/3 mid-term reviews?*

The following measures should be taken quickly at UK level, to indicate a willingness to embrace sustainable agriculture objectives. Other, more long term changes will require EU wide consensus and a desire to see world trade rules work for sustainable development, poverty eradication and food security rather than trade *per se*. To begin the transition from Pillar I (production supports) to Pillar II (rural development and agri-environment) the UK Government should:

- Increase modulation of production supports up to the allowable 20%, as soon as possible, but taper this so that the costs are borne by those who can most afford it;
- Match the funds released in this way to support a far wider programme of agri-environment and rural development schemes so that all farmers, for instance, have access to stewardship payments;
- Press for structured modulation to become compulsory for all member states in Europe at the 2003 CAP review and for more flexibility in the rules governing use of Rural Development funds and matched funds;
- Work with other European Member States to urge major CAP reform before 2006 and prior to enlargement, so that environmental and rural development support can help manage the process of agriculture/rural development in the accession states;
- Ensure the rapid phase out of all export subsidies (most urgently those for live exports) in tandem with new measures under Pillar II.

- Undertake health impact assessments of key commodity regimes (i.e. beef, dairy, cereals, fruit and vegetables and sugar) with the aim of redesigning the regimes to improve public health.

4.43 Other than CAP reform and modulation, what other mechanisms could you suggest to deliver the land management benefits that society expects?

Government should address the need for fairer terms of trade for all food suppliers through reviewing and strengthening the DTT's retailer Code of Practice, and by making it compulsory. We would argue that the competition policy rules which govern the process of drawing up such codes be amended so that all stakeholders who have an interest in the code should be involved in its development. The operation of the Code of Practice should be reviewed in detail after a year, by an independent analyst, to ascertain what impact, if any, it has made on the way in which the major retailers treat suppliers. To facilitate this, an immediate review of current practices should be carried out in order to have a baseline with which to compare current and changing practices.

Government should consider appointing an independent watchdog, to monitor the impact of the code and to arbitrate in cases of dispute between supermarkets and suppliers. There should also be consideration of a permanent regulator of the multiples to address the many issues highlighted by both the Competition Commission and those public interest groups concerned with consumer and environmental protection and local economies.

4.44 What negative effects do you consider might result from increasing the rate of modulation to 10% from 2004 and how could they be mitigated?

We are not able to provide detailed modelling data on the impact of 10% modulation by 2004 but we certainly believe such modelling should be undertaken and that DEFRA should consider how to structure the modulation – i.e. not a flat rate payment- so that the worst effects of this interim measure can be mitigated. The social justice case for targeting such measures at those who are able to afford it is very strong. Government already treats different farming sectors differently (e.g. pig, poultry and horticulture sectors receive no direct support) so a precedent already exists.

4.45 Which types of measure should it be possible to fund from money raised by modulation?

After consultation with all stakeholders, DEFRA should recommend for funding all measures identified as important for sustainable development in England. For example, the current England Rural Development Programme measures should be supplemented by schemes to support new entrants. In Ireland, for example, the Early Retirement scheme runs in conjunction with an installation aid scheme for new entrants. Funds could also be used to increase the use of traditional and dual breeds (such as dairy longhorns), as they do in Spain, and varieties with advantageous environmental and/or health traits.

England Rural Development Programme and Diversification

4.52 *What changes, if any, should we make to the objectives of the current agri-environment schemes?*

Sustain aims to produce a response to the consultation on this in due course. Animal welfare, local food, enhancing farming livelihoods¹⁴ and achieving nutritional as well as environmental goals at a regional level will all be features of a better ERDP.

4.54 *Should the Countryside Stewardship Scheme and Environmentally Sensitive Areas Schemes be merged?*

The current schemes should be merged to form a total package of measures, reflecting national and local priorities, a higher level of flexibility and with reduced administrative costs.

4.56 *How could the current schemes be simplified while also being made more flexible and more effective in delivering their objectives? If additional funding is limited following the Government's spending review, how should it be targeted?*

We strongly urge an increase in the budgets for the Processing and Marketing Grants and the Rural Enterprise Scheme. These are essential to ensure that emerging local initiatives which can shorten the food chain (the 'local' as opposed to 'locality' foods agenda) can obtain funds for capital costs, marketing and training.

Regulatory Framework including whole farm plans/audits

4.65 *Would a whole farm plan be a useful tool for land managers and regulators? How should it be funded? How should it tie into a system of whole farm certification to ensure that farmers can seek a market reward for good practice?*

Sustain has long advocated the use of whole farm plans as a means to deliver both farm business and environmental benefits. We designed a method of Whole Farm Management Agreements in 1994 (with Newcastle University) and are pleased to see such approaches now being discussed seriously. Funding for the whole farm audit could come through the "broad and shallow" scheme. There could be a link to the work being pursued on whole farm audits within the commercial farm assurance schemes, but we would caution against any reliance on commercial and voluntary schemes as a means to enforce or monitor compliance for statutory schemes.

Healthy Eating

4.77 *How can the supply of healthier produce and product lines be increased, to drive changes in consumer demand?*

We need more domestic fruit and vegetable production, which is more diverse and less specialised and with a rapidly growing proportion of organic production. An Action Plan as part of a wider national strategy on food to achieve these objectives would be a highly welcome outcome of the DEFRA consultation. This should ensure that major and sustained investment is made in the home

¹⁴ Hird, V. *Double Yield: jobs and sustainable food production*. 1987. SAFE Alliance. Available from Sustain: London

production of fruit and vegetables for domestic consumption. Experience in Finland¹⁵ 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 to consumers – from eating “cocktails” of residues), targets should be set for existing growers to convert to Integrated Crop Management (ICM) or organic methods, and new entrants should consider being organic from the start. 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 biodiversity.

Although consumption of fruit and vegetables is low, overall, it is lowest among low income groups. According to the Government’s own statistics¹⁶, 14 million people live in poverty. Lack of money is the most significant reason why people on low income cannot obtain healthier food. Budget standards, which are used successfully in countries such as Australia and Sweden, should be introduced when setting benefit and tax credit levels to ensure that people on low income can afford healthier food.¹⁷

Our work¹⁸ also highlights the problem of food deserts¹⁹ and we are enthusiastic about local-food buying co-operatives, which, as the many members of Sustain’s Food Poverty Network²⁰ demonstrate, can be extremely effective. However, community food projects, such as food buying co-ops only reach a very small percentage of any community. In the light of this we support the Policy Commission’s recommendation to encourage RDAs to expand and provide long-term financial support for such schemes, e.g. for retailers to supply food co-ops at low cost. The Commission also encourages city councils to provide sites for food markets (though sadly not specifically farmer’s markets in such areas). Again, we would support this recommendation but hope that the Government would give high priority to initiatives that vigorously promote healthy and sustainably produced foods.

Furthermore, we would like to see the recommendations of Government’s Policy Action Team 13 Report, which reviewed problems of food access and which have hitherto largely been ignored by central government, implemented in a national co-ordinated strategy. In particular, the report proposed providing support for and strengthening and improving small businesses in disadvantaged areas. We would also welcome national implementation of the Rate Relief Scheme as outlined in the recent Rural White Paper.²¹

Finally, without a significant improvement in public transport, e.g. making it affordable, reliable and accessible, and providing financial support for community transport schemes, low income consumers will continue to find it hard to obtain healthy produce.

¹⁵ *Nutrition in Finland*. 2000. National Public Health Institute: Helsinki. www.helsinki.fi

¹⁶ Department for Work and Pensions, Households Below Average Income 2002

¹⁷ 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 Watson, A, *Food Poverty: Policy options for the new Millennium*, 2001, Sustain: London

¹⁸ *Food Poverty: Options for the new Millennium*, Sustain, 2001

¹⁹ Food deserts can be defined as an urban or rural neighbourhood in which there are few, if any, local food shops selling a range of healthier produce

²⁰ The Food Poverty Network links project workers, researchers, campaigning groups and community food projects including cooperatives, community cafes, cook and taste sessions, voucher schemes and many more. It has a membership of over 500 groups and a database of projects is available on-line at www.food.poverty.heal-online.org.uk.

²¹ *Our countryside: the future, A fair deal for rural England*, 2001, The Stationery Office

4.78 *How can the food and farming industries support improvements in health, through the promotion of healthier diets, including greater consumption on fruit and vegetables?*

The main factor limiting the promotion of fruit and vegetables continues to be lack of money. The fresh produce sector, in particular, is fragmented and largely unable to generate the profits from value-adding that are available to the manufacturing sector, that would fund promotional activities. However, parts of the horticulture industry were able to fund experimental work with children that shows that they can be persuaded to eat significantly more fruit and veg²². The approach is expensive, and it works. It uses techniques similar to those used by the “junk” food industry in that fruit and veg is made freely and frequently available and is vigorously and imaginatively promoted using methods – such as role models and rewards - designed specifically to attract and keep children’s attention.

A complementary approach is being developed by Sustain’s Grab 5! Project, funded by the Community Fund to promote fruit and veg to children in low income areas. Grab 5! engages the private, public and voluntary sectors in a wide range of activities²³ focused on primary schools, which integrates promoting fruit and veg into both curricular and extra-curricular activities, including food provided in schools. This integrated “whole school” approach, ensures that fruit and veg are seen as attractive, as well as widely available and affordable, and that any practices that undermine this approach (e.g. lack of healthy choices at meal times, and using tuck shops and vending machines selling “junk” food to raise school revenue) are phased out as rapidly as possible.

Government should support these types of promotional and educational initiatives by making changes to the Department of Health’s National School Fruit Scheme. Currently, the scheme specifies only four fruit – apples, bananas, pears and satsumas – and buying is centralised, with no criteria for produce from domestic suppliers, for produce free from pesticide residues (such as organic), or for produce from fair trade suppliers. Vegetables are currently excluded from the main scheme, effectively further undermining domestic producers, since the UK currently imports around 50% of vegetables but 95% of fruit consumed. Nor is there any requirement for schools in receipt of free fruit to institute an integrated approach to the theory and practice of eating a healthy diet (although many, of course, will do so voluntarily). If these shortcomings were addressed, a revised National Fruit and Veg Scheme could contribute significantly to sustainable development.

4.79 *How can healthy eating messages be most effectively communicated to consumers, in particular by industry?*

One of the ways in which healthy eating messages are undermined is through the *unhealthy* eating messages that dominate the media (particularly media aimed at children), promoting 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 health.²⁴ Currently, more than 70 national organisations support Sustain’s call for government to protect children from “junk” food advertising²⁵. The UK Government should follow Sweden’s lead²⁶ and introduce legislation to protect children from advertising and promotions, targeted directly at children.

²² Horne, P. J et al. 1998. The way to healthy eating for children. The British Food Journal 100/3 133-140.

²³ See the project’s website www.grab5.com.

²⁴ *TV Dinners: what’s being served up by the advertisers?*, Sustain 2001

²⁵ www.sustainweb.org/labell_protect.shtm

Almost 10 years²⁷ of dialogue, calling on industry voluntarily to restrain their efforts to sell “junk” food to children, has had no discernible impact on their marketing techniques. We are therefore not convinced that the processed food industry is capable of playing a responsible role in this area.

However, as outlined above in 4.78, if a National School Fruit and Veg Scheme were developed, the UK’s fruit and veg industry (including frozen, canned, dried and juiced, as well as fresh) could make a significant contribution.

4.80 *What information does the public want in relation to production methods and country of origin?*

The UK Government should continue to take the lead in the EU, and in negotiations with relevant international institutions (particularly the World Trade Organisation and Codex Alimentarius Commission), 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 methods²⁸), but also processing and production methods. For example, the public wants full and accurate labelling on food produced using genetic modification (GM) techniques, even if the final product contains no GM material. Supplementary, detailed information through advice lines and web-based systems may also be helpful, but should not be regarded as a substitute for on-label information.

This labelling information must be accompanied by adequate enforcement measures. Currently there is 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 food standards legislation²⁹ (and, incidentally, hygiene laws³⁰) to be flouted routinely. To tackle these problems 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 offences³¹, 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 any licensing system introduced for farming and food businesses (see 4.90 in this submission).

Animal Health and Welfare

4.87 *What do you want to see in a “comprehensive animal health strategy”? What would be different from current practice? What should be its aim?*

We would welcome a comprehensive and integrated health and welfare strategy for farm animals. Long distance transport of live animals should be prohibited.³² This alone would be a major step

²⁶ Dibb, S. *A spoonful of sugar - Television advertising aimed at children: An international comparative study*. 1996. Consumers International: London

²⁷ *Children: Advertisers’ dream, nutrition nightmare?* was published by Sustain (then the National Food Alliance) in 1993.

²⁸ Jones, A, *Eating Oil: Food supply in a changing climate*. 2001. Sustain: London

²⁹ *The Food Magazine*. Issue 55, Oct/Dec 2001 and *passim*. The Food Commission: London

³⁰ See *Environmental Health News, passim* Chartered Institute of Environmental Health: London

³¹ *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

³² See submission to the Commission by Compassion in World Farming, 2001

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 humans³³. Reintroducing such breeds should further reduce the spread of disease through genetically similar (or identical) stock.

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. Experience from Sweden shows that this is entirely feasible. 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 inevitable) that these proposals would increase the cost of meat and dairy production to the point where the existing declining trends in demand for animal products accelerates. However, if this occurs, any 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.

There is a strong human health case for reducing consumption of meat and livestock products, of which the following is merely a brief summary, and lists of references are available:

Cancer

In 1997 a Department of Health report³⁴ concluded, *inter alia*, that:

“lower consumption of red and processed meat would probably reduce the risk of colorectal cancer...” and that “...individuals’ consumption ...should not rise...from around 90g/day cooked weight...”

Another report, published at the same time by the World Cancer Research Fund (a health research charity)³⁵ recommended that:

“If eaten at all, limit intake of red meat to less than 80g daily...”

The publication of both reports was highly controversial, and there were public accusations that government had bowed to meat industry pressure to increase the daily upper limit for meat consumption from 80 to 90 grams. A number of reports before and since have linked meat consumption to a wide range of cancer sites, including breast, pancreas and prostate, but the link to colorectal cancer remains the strongest.

Cardiovascular diseases

The link between meat and animal product consumption and cardiovascular diseases (CVDs) - coronary heart disease and stroke - is less direct than for colorectal and other cancers. While there is a good deal of evidence that vegetarians are less likely to die from CVD, it is not clear whether this is mainly due to their lower saturated fat intake (meat and dairy products are major sources in the UK diet), or their higher fruit and vegetable intake (and, thereby, higher intakes of protective

³³ Crawford, M A, *Fat animals – fat people*. July-August 1991. *World Health*.

³⁴ *Nutritional Aspects of the Development of Cancer*. Report of the Working Group on diet and cancer of the Committee on Medical Aspects of Food and Nutrition Policy. Department of Health Report on Health and Social Subjects, 48. Stationery Office, 1998.

³⁵ *Food, Nutrition and the Prevention of Cancer: a global perspective*. World Cancer Research Fund: London. 1997

anti-oxidant vitamins and minerals). CVDs remain the main cause of premature death in most wealthy, (post) industrialised countries, including the UK, but higher rates of these diseases are found among the poorest groups in these societies.

Osteoporosis

Given the ageing population, diseases linked to ageing - such as osteoporosis - are likely to increase. Several studies have found that vegetarians are at lower risk of suffering from this condition, and that some countries – and groups within countries – consuming a diet high in animal protein show higher rates of hip fractures (associated with osteoporosis).

Other diseases

Other diet-related conditions showing an association with meat and/or dairy consumption include: diabetes, gallstones, kidney disease, rheumatoid arthritis, diverticular disease, appendicitis, and obesity.

It is important to note that despite iron from plant foods being less easily absorbed than that from meat, evidence shows that vegetarians are no more likely to suffer from iron deficiency anaemia than meat eaters.

Food poisoning

Despite the difficulties inherent in measuring this phenomenon, it is widely agreed that rates of food poisoning have been increasing over a number of years. Indeed, one of the main aims of the Food Standards Agency is to reduce this problem. Food poisoning hits hardest at those with already weakened immune systems, such as the very young, the elderly and the ill. One estimate suggests animal products may cause as much as 95% of food poisoning cases.

The situation is further compounded by the continuing development of antibiotic resistance, which makes food poisoning cases, among others, more difficult to treat. While this is a complex issue, involving incorrect usage in medical situations, use of antibiotics in livestock systems has also been implicated. International institutions, including the World Health Organisation, have expressed serious concern and several countries have already stopped, or are phasing out using antibiotics in farming as a precautionary measure.

Demand and the nature of the livestock industry

Increasing demand for meat and animal products has, historically, been one of the factors driving the enlarging scale, intensive nature and higher volume of trading in the livestock industry. However, due to human health and animal welfare concerns outlined above, demand for meat and animal products in the UK has been falling for a decade or so. In response, the UK livestock sector has been engaged in a “race to the bottom”, facing increasing pressures to continue to improve productivity and reduce costs in an attempt to compete with cheaper, overseas producers for a declining market.

Instead, a favourable government policy framework (which included encouraging, for health reasons, the downward trend for consumption of animal products) could offer the livestock sector the opportunity to get off the treadmill and focus on a smaller volume of higher quality, higher priced produce for domestic consumption.

4.88 *Who are the key stakeholders, apart from livestock farmers? How should we involve them?*

The key stakeholders should include animal welfare groups, environmental experts, consumers, research institutes, relevant professionals (many of these groups are represented in Sustain's membership), and the food industry itself. These stakeholders should be represented on any group established to oversee the development and implementation of a comprehensive animal health strategy.

4.89 *How should the cost of disease control measures, and of outbreaks when they happen, best be met? Would an insurance or levy-based system be effective? If such products are developed, what should they cover?*

In the wake of BSE and FMD, it is not at all clear that the farming industry, particularly in the current perilous economic state, could afford the high premiums that would be necessary to cover the costs of future disease outbreaks. However if, in future, we developed a different livestock sector (as described above) there would be a smaller number of livestock, kept to higher welfare standards, with little or no long distance transport and greatly reduced trade. This would reduce susceptibility to a wide range of endemic and exotic diseases, ease the complexity of surveillance and monitoring, and reduce the spread and costs of any diseases that do occur. Under such a system, an insurance or levy-based system might become financially viable.

4.90 *How can we best persuade farmers to improve their own disease awareness, biosecurity, use of animal medicines, and standards of animal welfare? What role can be played by assurance schemes? What about those who do not wish to join?*

All farm and food premises, and the key food handlers who work in them, should be licensed before they can operate, and regularly checked thereafter³⁶. This could be linked to "whole farm plans", funded through the new "broad and shallow" scheme, and 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). In this way, well-trained people and high quality premises will be suitable for a range of food production and preparation activities, which would help underpin any diversification into on-farm processing. Moreover, animal welfare should improve and the incidence of disease and of microbiological contamination of food should decline. However, it is vitally important, particularly for small and specialist businesses that the process of becoming and staying a licensed operator should avoid burdensome paperwork.

There is also a delicate balance to be struck 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 bacteria³⁷. Much more research needs to be undertaken into how people acquire and maintain robust immune systems.

In Conclusion

We have tried, wherever possible, to substantiate our arguments with reference to published documents. However, it is evident that the food and farming systems is immensely complex and data is often difficult to obtain. In particular, the scale and nature of public funding for some parts

³⁶ 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.

³⁷ *How bogus hygiene regulations are killing real food.* June 2001. The Ecologist Report: London

of the food chain is not as easily accessible as it might be. It has been suggested to us that DEFRA might consider publishing an annual “State of Food and Farming” report, which might help not only to strip away some layers of complexity but also provide a way of measuring progress towards a sustainable system. We would be most interested in your reaction to this proposal.

In the meantime, we conclude by reminding you that Sustain has a highly effective and efficient member communication strategy that DEFRA could use to reach NGOs working in this area and we would be more than happy to organise contact with the membership. We look forward to working with DEFRA and Government as a whole on the development of a wholly new approach to food and farming which will result in a resilient system, capable of delivering environmental sustainability, public health and decent livelihoods.

18 June 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 set out at the beginning of this submission.

Allergy Alliance
Arid Lands Initiative
Baby Milk Action
Biodynamic Agricultural Association
British Heart Foundation Health Promotion
Research Group
Campaign for Real Ale
Centre for Food Policy
Chartered Institute of Environmental Health
Children’s Society
Community Nutrition Group
Compassion in World Farming
Ecological Foundation
Elm Farm Research Centre
Faculty of Public Health Medicine of the Royal
College of Physicians
Food Additives Campaign Team
Food Commission
Foundation for Local Food Initiatives
Friends of the Earth
Gaia Foundation
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 Consumer Federation
National Council of Women
National Federation of Women’s Institutes
National Heart Forum
New Economics Foundation
Pesticides Action Network, UK
Unison

World Cancer Research Fund
World-wide Workers on Organic Farms
VEGA Research
Women’s Environmental Network

List correct as of 18 June 2002