
SUSTAINABLE FOOD AND FARMING



Response to Defra consultation

June 2002

Food Ethics Council
39 – 41 Surrey Street
Brighton BN1 3PB

t: 01273 766 654
f: 01273 766 653

info@foodethicscouncil.org
www.foodethicscouncil.org

Note: Paragraphs in the DEFRA report are abbreviated as 'DEFRA.4.81' etc.

References to the FEC report 'After FMD' are abbreviated as 'FEC.6.3' etc for numbered paragraphs and 'FEC.p22' etc.

References to the Policy Commission report are abbreviated as 'PC.p. 35'.

1. In introducing these responses to DEFRA's questions, we would like to reiterate the first of the recommendations in our recent report ('After FMD: aiming for a values-driven agriculture', 2002), because it represents the cornerstone of the ethical approach advocated in the 'After FMD' report, viz. "A much greater priority should be accorded to respect for the ethical principles of autonomy and justice in formulating policies on agriculture and food, rather than relying on a simplistic utilitarian (cost/benefit) agenda that emphasises 'lean efficiency'. The latter inevitably results in an increasingly unequal industry, which is detrimental both to farmers and the wider society. Trivial increases in productivity introduced with the aim of maintaining a competitive edge may produce severe and irreversible adverse effects on farmers' economic viability." (FEC.6.1) We wish to strongly reinforce that this message underlies all our responses to the DEFRA document. We believe that the adoption of a more principled approach to agricultural and food policy would provide numerous benefits to the UK, and that such an approach should be as visible as possible. Not only is it likely that, had such an approach been in place, recent costly episodes such as the BSE crisis would have been avoided, but it would also help in the crucial task of rebuilding public trust in all parts of the food supply system.

2. Before responding to specific questions, we also wish to comment that we found both the terms of reference of the original Policy Commission, and some aspects of the DEFRA response, to be cast in such a way that some central issues in this debate were not adequately addressed. For example, the impacts of trade liberalisation on developing countries may not necessarily be in their best interests, and we do not accept that "free trade" necessarily equates with fair or just trade. There is no attempt to address the question of

whether "internationally competitive" farming can ever be completely "sustainable and environmentally friendly": we suggest that as long as current short-term economic accounting systems predominate, these two objectives are irreconcilable. We are also disappointed at the lack of any serious attempt to integrate the two documents more fully with the agendas of the WTO and of the 2002 World Food Summit: five years later.

3. The following comments highlight several of the issues we feel are particularly important. There is, however, much overlap between them (illustrating the interconnections which need to be taken account of in the whole food system), so that our comments should be considered collectively (as in the original FEC report). Farming and the Food Chain

4. DEFRA 4.9 refers to the need to target "aspects of the food chain" in order to "have the most impact on efficiency". We are, first, concerned that this statement assumes a somewhat linear view of the food chain, where producing alterations at one particular "link" along it will lead to a predictable overall effect. We believe this not to be the case: the various links in the chain are related to each other in many complex ways, and experience with numerous other complex systems (both natural and man-made) has shown that they react to change in ways which can be highly unpredictable. We feel a major role of the Food Chain Centre should initially be to develop realistic, robust, and testable models of the "food chain" which take account of the relationships between the various actors (such as those retailers, processors and farmers) and recognise the need for trust and openness in these relationships.

5. We also note in DEFRA 4.9 that no attempt is made to define "efficiency". Are we talking here simply in terms of economic efficiency, and if so, how is to be measured? We urge that one of the first major questions for the Food Chain Centre should be how to adopt a method of accounting that measures the full impact of any changes introduced (i.e., genuine full cost accounting, which should include all energy costs, costs of social exclusion, and impacts on health and well-being). We would again reiterate that unless an approach is taken which encompasses a complete and comprehensive ethical analysis of the issues surrounding food and agriculture, measures may be taken with the best of intentions that turn out to have enormous costs, economic, environmental, and social. We recognise that such analyses will be very complex, and that much research may be required to develop and optimise them, and we believe such research should be accorded a high priority for funding.

6. While we recognise that more research into different farming systems is necessary, it is worthy of note that a recent report of a 21 year study on the agronomic and ecological performance of biodynamic, bioorganic and conventional farming systems (Mäder et al, (2002), Science 296, 1694-7) shows that while fertilizer, energy and pesticide inputs were

reduced by 34%, 53% and 97% respectively, in the organic systems, crop yields were only 20% lower. The authors concluded that enhanced soil fertility and biodiversity in organic systems "may render these systems less dependent on external inputs". Improving performance in farm and other land management

7. DEFRA.4.17-4.19 refer to training; encouraging best practice; and research and development; while the PC report emphasises the importance of well co-ordinated research, focused on sustainability. We believe these objectives will entail a re-prioritising of research objectives and funding (cf. FEC.6.5) to emphasise low external input sustainable approaches (LEISA: see FEC.5.1.7). In practical terms this will involve encouraging research into sustainable systems by:

§ Allocation of ear-marked funding for appropriate research in universities, colleges and government research institutes (based on competitive bids)

§ Encouraging curricular innovations in degree and sub-degree educational programmes (lecture modules; practical training courses; scholarships etc)

§ Promoting extramural educational and instructional programmes for members of the farming and food industries to engage in in-service training

8. The underlying need here is to re-establish the demand for further and higher education in holistic land based studies, which has suffered with the rise of the reductionist agenda that now dominates the agricultural and food sciences. It is symptomatic of the malaise that university faculties once proud to call themselves 'agricultural' have been reinvented as 'schools of biosciences', i.e. pursuing essentially laboratory-based activities divorced from the social, political and economic context in which agriculture takes place.

9. Another important adverse development has been the growing domination of research (and to a degree, academic courses) by the priorities of those commercial companies able to fund research programmes. The objectivity, openness and impartiality which formerly characterised academic research has been largely supplanted by sponsored contract research pursued in corporate interests, frequently under a veil of 'commercial confidentiality'. In our view (FEC.6.5), there is a need for increased public spending on appropriate research, but the situation would be ameliorated by redirecting a proportion of existing government research funding away from exclusively hi-tech approaches towards sustainable systems.

10. We stress (see FEC.4.1.4) that this does not represent an anti-science stance by the Council. Indeed, the intellectual challenges faced in developing the research tools necessary in such areas are enormous (and are also being faced in many industries). It calls for a more sophisticated scientific approach to the problems we face, which recognises and addresses these complex issues as systems issues which cannot be analysed in a reductionist manner. And it recognises that appropriate technology is but a part of any soundly-based, ethical solution to problems. Resource protection

11. DEFRA.4.31 notes that some farming practices have been actively damaging to the environment, a fact that was illustrated in FEC. 3.10 and 3.11. Our recommendations (FEC. 6.15- 6.16) are in line with PC recommendations for switching CAP subsidies from production to environmental benefits.

12. DEFRA.4.34 asks whether a clear and measurable description of good farming practice can be established, to enable farmers to understand and meet environmental objectives. We believe that this is a crucially important, and complex, question, which should be addressed by academics and agriculturalists, working from a range of different perspectives. PC.p67-94 considers a number of relevant issues here, but the Commission members would probably agree that systematic, detailed research is called for if practical indices are to be devised. We propose that research should be undertaken into the desirability of producing "ethical indicators" that would enable the full costs of different aspects of the food chain to be transparent to all its participants. These would include, but would not be limited to, good farming practice. Such indicators might subsequently be used for a food labelling scheme, which, provided it was sufficiently clear to members of the public, could do much to restore the damaged public trust in the food chain.

13. The answer to DEFRA.4.34 will impact strongly on the subsequent questions (DEF.4.35-4.37). But, as shown by the Swedish experience (FEC.p.34) there is a strong case already for encouraging sustainable practices by imposing taxes on those who cause pollution through excessive use of pesticides or fertilizers. However, we are convinced that an important element of a reformed agri-food system will entail according high priority to localisation (FEC.6.4). Not only will this cut wastage and improve farmers' share of the profits, but it could have environmental benefits in reducing food miles, thus saving fossil fuel reserves and cutting greenhouse gas emissions. We recommend that research and modelling on barriers to local trade are initiated. Healthy eating

14. Question DEFRA.4.77 asks 'How can the supply of healthier produce and product lines be increased, to drive changes in consumer demand?' In fact, we believe there is already a demand for healthier food, even if many people are not sufficiently aware of its real characteristics, or are unable to gain access to it for financial reasons. PC.p103 highlights the need to encourage healthy eating.

15. We believe there is an urgent need for Government action to promote healthy eating, e.g. in schools (FEC.6.10) and with the general public (FEC.6.9). The task is, however, made more difficult by persuasive advertising campaigns run by food companies, which often exacerbate, or do little to reduce, the incidence of diet-related disease (FEC.3.4). There is now a strong case for curbing irresponsible advertising e.g. of products with high sugar, fat and salt contents in TV advertising during children's programmes, and/or by requiring 'government health warnings' (as for cigarettes) (cf. FEC.p17). Overall we suggest that the economic and social costs of poor eating habits far outweigh the economic benefits of promoting them; this is an obvious case where genuine full cost accounting (see para.6 above) and the adoption of a more principled stance on this issue could be applied. Even in the UK, the problem of "food poverty" is a serious one that needs to be tackled as part and parcel of any reforms to the food and agriculture system.

16. More generally, a broader, systematic understanding is needed of the way the current operation of the food system may be dysfunctional for people's health. This operates both through pressures on producers and processors to employ methods that jeopardise the production of healthy products and because consumers are often pressurised into consuming poor diets. Animal health and welfare

17. DEFRA.4.87 asks 'What do you want to see in a "comprehensive animal health strategy"?' Our answer must be 'a quite radical reform.' FEC.6.11- 6.14 detail a number of recommendations, which if implemented could have significant beneficial effects. Many rest ultimately on respecting the Amsterdam Treaty which requires that we assign higher priority to considering farm animals as sentient beings, rather than agricultural products, and to the welfare provisions that flow from that recognition. Fundamentally, a 'comprehensive animal health strategy' will entail progressive abandonment of intensive animal production systems (typified by battery-caged and housed broiler chickens, and most indoor pig farming) in favour of systems based on free-range husbandry at lower stocking densities, in which wastes can be recycled as part of an integrated farming system. There is, however, no reason for complacency: much more research is needed as a basis for the development of more humane systems of animal husbandry.

18. Intensive systems almost inevitably depend on antibiotic use (even though they are being phased out as growth promoters), extensive application of mutilations (e.g. to diminish injuries from fighting), serious environmental threats in disposing of waste products, and stressful long-distance transport of animals (because they are concentrated in large units and there are too few slaughterhouses). It should be noted that animal production systems which encourage good health and nutrition, low stress levels and low stocking densities enable natural resistance to infection to develop whilst at the same time automatically encouraging greater animal welfare and reducing environmental loading.

19. We believe that all livestock farmers should be have to be licensed on the basis of demonstrated competence, and that membership of an approved farm assurance scheme should be an obligatory requirement for marketing of all animal products. The recent CIWF publications ['Farm assurance schemes and animal welfare' and 'Supermarkets and animal welfare' (2002)] provide valuable information on the standards accepted by different retailers and on how animal welfare might be assessed more effectively overall.