

Response of the Food Ethics Council to the House of Lords Select Committee on food, poverty, health and the environment call for evidence – on how to make a healthy, sustainable diet affordable and accessible for everyone

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Respondent type: Charity (registered charity and company limited by guarantee)

Who we are

1. The Food Ethics Council is a registered charity whose mission is to accelerate the shift to fair food systems that respect people, animals and the planet. Our vision is of a world where it is easy to eat well and global hunger is a distant memory; where farmers and food producers make a decent living, animals are treated humanely, and the environment is respected.
2. We were founded in 1998 and are considered by stakeholders to be experts on fairness and sustainability in food and farming, and the leader on ethical food issues. For over 20 years, we have provided an independent voice and expertise from our Council and networks (across civil society, business and government) to bring ethics to the centre of the food system. Our role is three-fold:
 - i. Firstly, we *nourish*: we provide a safe space for honest, meaningful dialogue and develop ethical frameworks to unpack contentious issues
 - ii. Secondly, we *challenge* the status quo and accepted ways of thinking
 - iii. Thirdly, we *inspire* and promote ‘in the round’ ethical approaches and share considered solutions.
3. The Food Ethics Council is an expert body consisting of 19 Council members, leaders in their fields, bringing extensive networks and a range of expertise, from academic research and ethics through to practical knowledge of farming, business and policy.
4. We have published research for Defra on the extent of food aid provision in the UK, we have produced Business Forum reports on a host of relevant topics, we run Food Policy on Trial sessions critically exploring emerging policy ideas, and much more.

Overarching comments

5. The goal should be to make healthy, environmentally sustainable, fair and humane diets accessible to everyone, so that everyone can enjoy eating good food that has a net positive impact on people, planet and animals. At a time when so many people are living in poverty, much more should be done to empower people. The answer does not lie in producing ever cheaper food (which costs the environment and/ or farmers); instead it lies in producing high quality, healthy food in ways that nourish the soil and our environment and that deliver positive nutrition. Critical to this is farmers and producers being rewarded properly for looking after their animals, people and environment much better.

Responses to individual questions

Q1. What are the key causes of food insecurity in the UK? Can you outline any significant trends in food insecurity in the UK? To what extent (and why) have these challenges persisted over a number of years?

The reasons behind hunger and household food insecurity are many and complex – and many go beyond the immediate confines of our food systems.

There are a number of factors behind the significant growth in the number of food aid users in the UK reported in recent years. Note – this tells only part of the overall picture of household food insecurity, as many people suffering from household food insecurity do not want to suffer the indignity of using food banks (and other forms of charitable food aid provision). As we wrote in our Business Forum on ‘Below the Breadline’¹: “Firstly,

¹ Food Ethics Council (2014) – Beyond the Breadline

<https://www.foodethicscouncil.org/app/uploads/2014%20Belowthebreadlinebeyondreach.pdf>

the cost of living has been rising – with food prices having increased since 2008 and fuel prices having risen 45% over the past five years. Secondly, wages and benefits have remained stagnant or have fallen over the same period. The amount of part-time employment has also increased – and these combined have resulted in wider economic insecurity. Thirdly, many UK households have been affected by economic austerity and reduced public spending – including cuts in community-level support systems. Fourthly, there has been a reduction in entitlements and levels of social security – with undocumented changes in administrative practices (administrators becoming stricter and increasing incidence of applying sanctions) and the removal of the spare room subsidy. There is also a rising general level of indebtedness. Finally, there is a general sense of insecurity and often a lack of future planning. These factors have combined to create a growing – and increasingly visible – problem in the UK.”

Q2. What are some of the key ways in which diet (including food insecurity) impacts on public health? Has sufficient progress been made on tackling childhood obesity and, if not, why not?

Self-evidently, what we eat has a huge impact on public health issues, including adult and childhood obesity. No way near enough progress has been made on tackling childhood obesity, with the UK having one of the highest rates in Western Europe. Tackling childhood obesity requires a multi-pronged approach, but should include doing more to promote breastfeeding.

Q3. How accessible is healthy food? What factors or barriers affect people’s ability to consume a healthy diet? Do these factors affect populations living in rural and urban areas differently?

Healthy food is accessible to some, but not to others. There are a huge range of factors affecting people’s ability to consume a healthy diet – household income is an important one, but not the only. Lack of accessibility to healthy food is a problem in both rural and urban areas, albeit the extent will vary significantly between different regions.

Q4. What role can local authorities play in promoting healthy eating in their local populations, especially among children and young people, and those on lower incomes? How effectively are local authorities able to fulfil their responsibilities to improve the health of people living in their areas? Are you aware of any existing local authority or education initiatives that have been particularly successful (for example, schemes around holiday hunger, providing information on healthy eating, or supporting access to sport and exercise)?

No answer given to this question. We feel others will be better placed to respond here.

Q5. What can be learnt from food banks and other charitable responses to hunger? What role should they play?

As we wrote in our Business Forum report ‘Beyond food charity’²: *“Many food companies sponsor food drives, donate money and food and provide mentoring to charities, while some are strong supporters of breakfast club initiatives. The main benefit of a food charity approach is that it is helping meet a current and acute need for a lot of people. A separate but related argument is that food can be used as a gateway to provide other important services. Addiction charities for example who are not getting addicts to come and use their services say that when food gets brought in, it creates a ‘stickiness’ that attracts people and encourages them to access the service.*

However, food charity is surely not a long-term solution to poverty and should not be needed in the first place. It was argued that food charity is an unsustainable, inadequate and socially unacceptable response to household food insecurity. Why? It is because food charity tends not to be universal or guaranteed, can be inaccessible and unreliable (e.g. holiday club provision may only be for a couple of weeks in the summer holidays) and is unaccountable to those it serves, with recipients lacking rights or entitlements in these systems.

The oft-cited example of the perversities of the food charity approach is the claim that a proportion of food retailer employees are having to rely on food banks to which that retailer itself is donating lots of food.

² Food Ethics Council (2019) Beyond Food Charity Business Forum Report
https://www.foodethicscouncil.org/app/uploads/2019/07/Beyond-Food-Charity-Business-Forum-Report_TO-PUBLISH.pdf

Many food businesses are funding a charitable sector which is becoming normalised as a second-class distribution system for people who don't qualify to be full members of our society.

There is lots of important work being done around the edges of food aid provision, but they are nonetheless exclusionary spaces, using food from a secondary market. Separately, it was argued that the food redistribution model is also not a long-term solution to the waste built into the model."

Q6. What impact do food production processes (including product formulation, portion size, packaging and labelling) have on consumers dietary choices and does this differ across income groups?

Food production processes have a significant impact on the dietary choices of people in the UK. We do not have information available about how this differs across income group, but others will.

Q7. What impact do food outlets (including supermarkets, delivery services, or fast food outlets) have on the average UK diet? How important are factors such as advertising, packaging, or product placement in influencing consumer choice, particularly for those in lower income groups?

The obesogenic food environment around us has a huge impact on what and how people eat. Factors such as advertising, packaging and product placement are vital factors in influencing the purchasing and consumption habits of all UK citizens, particularly many of those in lower income groups, whose options are heavily restricted. Food outlets – encompassing both retail and foodservice – have a profound impact on people's behaviours.

Q8. Do you have any comment to make on how the food industry might be encouraged to do more to support or promote healthy and sustainable diets? Is Government regulation an effective driver of change in this respect?

In our experience of engaging with senior executives from food and drink businesses through our Business Forum for the last 12 years, they tend not to be against regulation; instead they want a level playing field. This was highlighted in our Beyond Business As Usual³ work. Government regulation is vital to raise minimum standards and to encourage businesses to continually improve. We can learn from the success of measures such as the Landfill Tax escalator, which ratcheted up ambition over a period of time, providing greater certainty to businesses.

Q9. To what extent is it possible for the UK to be self-sufficient in producing healthy, affordable food that supports good population health, in a way that is also environmentally sustainable?

There is a critical distinction between whether it is *possible* for the UK to be self-sufficient in producing healthy, fair, environmentally sustainable and humane food for all – and whether it is *desirable* for the UK to seek to be self-sufficient in such food. There would appear to be scope for the UK to significantly increase e.g. production of fruit, vegetables, pulses and nuts and in so doing to significantly increase levels of self-sufficiency. However, there will always be some food types that it will not make sense (economically or environmentally) to try to grow/ produce in the UK, that are better grown in other countries and that – done well – can deliver social, economic and environmental benefits to the countries from which they are sourced.

Q10. Can efforts to improve food production sustainability simultaneously offer solutions to improving food insecurity and dietary health in the UK?

Yes, it should be possible for farming and food production to be done in ways that are not environmentally damaging and that deliver positive nutrition.

Q11. How effective are any current measures operated or assisted by Government, local authorities, or others to minimise food waste? What further action is required to minimise food waste?

No answer given to this question. We feel others will be better placed to respond here.

Q12. A Public Health England report has concluded that "considerable and largely unprecedented" dietary shifts are required to meet Government guidance on healthy diets. What policy approaches (for example,

³ <https://www.foodethicscouncil.org/resource/beyond-business-as-usual/>

fiscal or regulatory measures, voluntary guidelines, or attempts to change individual or population behaviour through information and education) would most effectively enable this? What role could public procurement play in improving dietary behaviours?

We do not believe that a voluntary approach (in isolation) will be effective. Therefore we believe that, amongst other things, Government interventions are required to stimulate the huge dietary shifts needed.

These might include, but not be limited to:

- **Introducing dietary guidelines** that are good for people, the planet and animals – building on for example the excellent work done by WWF’s LiveWell plate
- **Empowering people as food citizens**, giving them a genuine say in shaping our future food system and in holding the government (and others) to account
- **Rewarding farmers for delivering public goods**, once the UK has left the EU
- **A tax on ultra-processed food** – if revenues raised were ringfenced and used to support those worst affected; if the benefits of such a tax were clearly communicated to the general public e.g. learning from the Mexican food tax where revenue earned went towards (highly visible) water fountains in public areas, rather than the Danish fat tax, where it went towards (invisible) tax allowances; if a clear definition of ‘ultra-processed’ is identified; if the poorest in society are supported and empowered to participate; and if lessons are learned from other countries that have introduced food and drink taxes.. As we said in our ‘Food Policy on Trial: in the dock – meat tax’ Jury verdict⁴, we suggest *“exploring (i) whether it would make more sense to tax the ingredients used e.g. sodium nitrite or to tax ultra-processed meat per se and (ii) whether it would be preferable to apply this to an existing mechanism (e.g. VAT) or introducing it separately (as per Soft Drinks Industry Levy)”*
- **The introduction of fiscal measures to incentivise climate-friendly livestock production and penalise ones that contribute to global warming.** These measures might include e.g. import tariffs on feedstuffs for intensively reared livestock, carbon taxes, nitrogen taxes and subsidies.
- Introducing bold public procurement targets on organic, fairly and sustainably sourced food, as part of a balanced scorecard
- **Radical restrictions on food and drink advertising for the worst offending food and drink categories**, including stronger planning legislation (e.g. in zones around schools) to transform our obesogenic food environment for the better.

Q13. Has sufficient research been conducted to provide a robust analysis of the links between poverty, food insecurity, health inequalities and the sustainability of food production? How well is existing research on the impact of existing food policy used to inform decision making?

No, there is has not been sufficient research conducted to provide a robust analysis of the links between poverty, food insecurity, health inequalities and the sustainability of food production and we would welcome more research in this area. Having said that, many of the links are well understood and we would urge that the lack of comprehensive research (in a constantly changing society) not be used an excuse for inaction.

We are not policymakers, therefore can not comment on the extent to which existing research on the impact of existing food policy is used to inform decision-making.

Q14. What can the UK learn from food policy in other countries? Are there examples of strategies which have improved access and affordability of healthy, sustainable food across income groups?

There are huge amounts the UK can learn from food policy in other countries. As highlighted in our ‘Snapshot’⁵ analysis of the UK’s performance in the 2018 Food Sustainability Index (‘FSI’) - by the Economist Intelligence Unit and BCFN - overall the UK performs poorly on food sustainability, given the resources it has. The UK ranks just 16th out of 28 EU countries in the Food Sustainability Index. As we way in our Snapshot report:

⁴ <https://www.foodethicscouncil.org/app/uploads/2019/05/Food-Policy-On-Trial-Meat-tax-Jury-verdict-final.pdf>

⁵ https://www.foodethicscouncil.org/app/uploads/2019/02/Snapshot-FSI_analysis_2018.pdf

“It is vital to learn from what other countries are doing. We advocate the development of an international food sustainability learning exchange, where countries around the world can share inspiring best practice examples of holistic approaches to policy and practice that have a positive impact on food sustainability in the round. For example, in November, France — top of the FSI rankings — proposed a suite of measures aimed at putting a stop by 2030 to deforestation caused by imports of non-sustainable forest or agricultural products. Brazil has a holistic set of dietary guidelines; Denmark has bold policies and targets on promoting organic food; Japan has a progressive approach to food education; and the list goes on. There are a growing number of good news stories. Whilst it is not as simple as ‘cutting and pasting’ one policy approach from one country to another — because of different cultural contexts — nevertheless there are huge, largely untapped opportunities, for better sharing of policy ideas and approaches that contribute to fair, healthy, humane and environmentally sustainable food and farming.”

Our ‘Lessons from France’⁶ Business Forum report describes some of the lessons the UK can learn from the country leading the way in the FSI, France:

“Lessons for the UK include the importance of: a holistic, whole systems approach; bold targets, including on public food procurement; transitioning towards an agroecological approach – underpinned by significant, targeted investment; having comprehensive plans on critical issues like childhood obesity and food waste, translating objectives into policy actions that drive meaningful change; tackling unfair shares in food value chains and exploring how to create more value; getting a healthy balance of education, incentives and regulation”

In our ‘Lessons from Denmark’⁷ Business Forum report, one of the lessons is about the importance of setting bold public procurement: *“The Danish national government has taken several measures to support organic food production via public procurement. In 2011, it established a goal of 60% organic in all public settings by 2020. Copenhagen set itself the explicit target of sourcing at least 90% organic food in its municipal institutions, which it has now met. In October 2018, Denmark was awarded silver in UN Future Policy Awards for having one of the most efficient organic initiatives in the world.”*

Q15. Are there any additional changes at a national policy level that would help to ensure efforts to improve food insecurity and poor diet, and its impact on public health and the environment, are effectively coordinated, implemented and monitored?

We strongly support the development of an ambitious, overarching, long-term and integrated national food strategy, that has cross-party support and buy-in of all key government departments. This should link into international commitments such as the Sustainable Development Goals and the Paris Climate Change agreement. We also want measures taken that will promote adoption of the real living wage, will enable more people to get into good secure employment and will ensure the social security system functions properly to support people in need. The answers to tackling household food insecurity lie in empowering people and getting more people paid and treated better, not than in artificially suppressing the price of food and promoting cheap food (when others always end up paying the true cost of cheap food).

**Submitted by: Dan Crossley, Executive Director, Food Ethics Council on behalf of the Food Ethics Council
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⁶ https://www.foodethicscouncil.org/app/uploads/2018/04/Lessons-from-France_Business-Forum-report_March_2018-copy.pdf

⁷ https://www.foodethicscouncil.org/app/uploads/2019/08/Lessons-from-Denmark_Business-Forum-report_June-2019.pdf