

Food Ethics Council submission to Defra's Health and Harmony command paper consultation

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Who we are

1. The Food Ethics Council is a registered charity whose mission is to build fair and resilient 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. Our role is three-fold:
 - (i) Hold the UK Government and other key UK food system actors to account
 - (ii) Convene key decision-makers and experts, equipping them with the research, information, tools and safe space to explore ethical questions themselves, allowing them to reach practical solutions
 - (iii) Advocate and promote ethical considerations surrounding food and farming, in particular to those in positions of influence. We challenge policies and business models promoting unhealthy, unfair and unsustainable practices and products – and promote alternative, fair ways forward.
3. The Food Ethics Council is an expert body consisting of 16 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.

Overarching comments

4. There is much to welcome in the 'Health and harmony' paper. We welcome the promotion of 'farming excellence' and the importance of the proposed shift from direct payments towards public money for public goods – a move that has long been argued for and which is widely welcomed. We welcome the command paper's inclusion of the need for high standards and practice of farm animal welfare; of the mention (albeit brief) of fairness in supply chains; and the reference to the importance of farmer-to-farmer learning and knowledge sharing.
5. However, there are also some gaps and areas that are cause for concern. We believe that the focus should be on the future of food systems, rather than a narrower focus on how to support farmers to deliver public goods (as welcome as that is). The risk of failing to take a systems perspective is that policy solutions may be designed and implemented that deliver unintended consequences and/ or that lock us into a largely industrialised model where over 50% of food is ultra-processed (with knock-on health impacts).
6. Despite the command paper's title, there is a notable absence of proposed initiatives to redesign a food system to deliver public health. We urge a reframing of what is meant by 'productivity', beyond the narrow definition of 'producing more' and instead promoting farming for positive nutrition. We need a long-term food and farming strategy that joins up food, farming, environment, animal welfare and public health.
7. There is a noticeable lack of detail in some areas, including the key issue of labour. There is brief mention of apprenticeships and a long-term aspiration to encourage more domestic workers to enter the farming profession. However, there is a lack of detail on how the UK Government will avoid the impending 'cliff edge' for businesses that rely heavily on migrant workers from the rest of the EU.
8. Household food insecurity is an area not adequately covered in the command paper. We urge the government to take stronger measures to tackle the root causes of household food insecurity, such as

tackling indebtedness, setting the national living wage at the same rate as the real living wage and providing an adequate safety net for those on low incomes.

9. One line in the command paper that causes particular concern is “*We will adopt a trade approach which promotes lower prices for consumers*”. Despite the welcome positive rhetoric in much of the rest of the command paper, this one sentence is particularly worrying. It opens the door for the UK government to negotiate trade deals that risk the called-for ‘excellence’ of UK food and farming being undercut by low quality imports. We must have a race-to-the-top, not a race-to-the-bottom.
10. UK citizens all have a vested interest in the long-term health and wellbeing of food and farming. We need to accelerate the shift from a Consumer mindset to a Citizenship mindset in food and farming. This would give people and organisations greater agency to shape - and participate in - fair, healthy, humane and environmentally sustainable food systems.
11. As we wrote in our ‘Fronting up¹’ publication: “Now more than ever, is an opportune time for the UK Government and Devolved Administrations to consider the UK’s place in the world – including the importance attached to ‘good’ food and farming. There has arguably never been a more important time for food ethics. Having an aspirational ambition for the UK to be a world leader on food, farming, animal welfare and environmental issues – as the Secretary of State for the Environment, Food and Rural Affairs has put forward – is a good starting point and an ethical imperative. However, for such an aspiration to become a reality, it needs other ‘ingredients’ that are currently lacking. We want the UK Government and Devolved Administrations to attach a higher priority to ethical concerns in food and farming policy... Taking an ethical approach in tackling the food issues we face means having a better understanding of the implications of our choices when dealing with concerns about human health, animal welfare, environmental protection or trade justice. It is important to consider as best as possible what the values we want to promote as a country are, what the most contentious issues are and what the consequences from particular courses of action are likely to be. Who are likely to be the biggest winners and losers? And how can national Governments – and others – address trade-offs head on?..... To provide an ethical response to food system challenges, we must consider the different values that affect our food choices. We must look at the consequences of those values and their likely impacts on different interest groups, then weigh them up and try to decide what is right, **all things considered**. There are three ethical principles we feel are particularly important – respect for fairness, wellbeing and autonomy.”

RESPONSES TO SPECIFIC CONSULTATION QUESTIONS

Note: we have only responded to those consultation questions that we feel qualified to comment on and have simply written ‘no comment’ where we feel others are better placed to respond.

SECTION 2: Reform within the CAP

12. No comment on the questions in this section

SECTION 3: An ‘agricultural transition’

Q. What is the best way of applying reductions to Direct Payments? Please select your preferred option from the following: a) Apply progressive reductions, with higher percentage reductions applied to amounts in higher payment bands * b) Apply a cap to the largest payments c) Other (please specify) * please provide views on the payment bands and percentage reductions we should apply.

13. One of our concerns is ensuring that the most vulnerable farmers (including but not limited to the smallest farm businesses) do not face a cliff edge, hence we would favour a version of **(a)**, applying progressive reductions, with higher percentage reductions applied to amounts in higher payment bands.

Q. What conditions should be attached to Direct Payments during the ‘agricultural transition’? Please select your preferred options from the following: a) Retain and simplify the current requirements by removing all of the greening rules b) Retain and simplify cross compliance rules and their enforcement c) Make payments

¹ https://www.foodethicscouncil.org/uploads/index_summary_WEB_final.pdf

to current recipients, who are allowed to leave the land, using the payment to help them do so d) Other (please specify)

14. No comment

Q. What are the factors that should drive the profile for reducing Direct Payments during the ‘agricultural transition’?

15. No comment

Q. How long should the ‘agricultural transition’ period be?

16. We do not have access to detailed impact modelling to be able to make a definitive judgement on this. Clearly a balance needs to be struck between avoiding a cliff edge and taking too long to transition. We would imagine an appropriate period might be between 3 and 5 years.

SECTION 4: A successful future for farming

Farming excellence and profitability

Q. How can we improve the take-up of knowledge and advice by farmers and land managers? Please rank your top three options by order of preference: a) Encouraging benchmarking and farmer-to-farmer learning b) Working with industry to improve standards and coordination c) Better access to skills providers and resources d) Developing formal incentives to encourage training and career development e) Making Continuing Professional Development (CPD) a condition of any future grants or loans f) Other (please specify)

17.

1 (a)

2 (c)

3 (d)

Q. What are the main barriers to new capital investment that can boost profitability and improve animal and plant health on-farm? Please rank your top three options by order of the biggest issues: a) Insufficient access to support and advice b) Uncertainty about the future and where to target new investment c) Difficulties with securing finance from private lenders d) Investments in buildings, innovation or new equipment are prohibitively expensive e) Underlying profitability of the business f) ‘Social’ issues (such as lack of succession or security of tenure) g) Other (please specify)

18. No comment

Q. What are the most effective ways to support new entrants and encourage more young people into a career in farming and land management?

19. As we wrote in our ‘Food Makers 2030’² Business Forum report: “Farming is often seen as a low status career choice, and the lack of positive rural role models in the media entrenches this belief. The industry is trying to tackle the practical issues that are stopping young people from working in food and farming, but this is unlikely to work until they have tackled the social barriers. Many young people are interested in entrepreneurship and technology. Farming and food production can offer opportunities in both these areas – but the industry needs to change to embrace these interests. An image of food producer as entrepreneurial, rebellious and challenging is surely much more likely to capture the imagination of young people than the bucolic image of a rural idyllic life.

20. There is a lack of a clear career path and of professional qualifications in food and farming. Coupled with very few opportunities for young people to ‘try before they buy’, this is a serious barrier to encouraging younger generations into the industry. There is a lack of access to practical support for would-be farmers and food producers, including access to land or to training in marketing and accountancy. Social isolation is also a key challenge.

² https://www.foodethicscouncil.org/uploads/publications/170328%20Food%20Makers%202030_FINAL.pdf

21. Younger generations often have different values to older generations. They are interested in social value as well as economic value. Farming can offer unique opportunities to ‘give back’ to society. But not all farming jobs will be high-tech. There will always be a role for manual labour, which is important in ensuring that rural communities are sustainable and thrive. There are also an increasing number of technical career paths in food and farming that young people could be inspired to pursue. It was argued that the future of farming depends on building high quality jobs that allow people to do great things, rather than on poor quality jobs that are ‘dirty, dull and dangerous’ – and at risk of becoming a fourth ‘D’ – defunct, with the onset of mechanisation.”

Q. Does existing tenancy law present barriers to new entrants, productivity and investment?

22. No comment

Agricultural technology and research

Q. What are the priority research topics that industry and government should focus on to drive improvements in productivity and resource efficiency? Please rank your top three options by order of importance: a) Plant and animal breeding and genetics b) Crop and livestock health and animal welfare c) Data driven smart and precision agriculture d) Managing resources sustainably, including agro-chemicals e) Improving environmental performance, including soil health f) Safety and trust in the supply chain g) Other (please specify)

23. The research topics mentioned above are all important areas to research and we are unable to categorically rank them in order of importance. More fundamentally, we believe this question would be much more valuable if framed as ‘what are the priority research topics that should be focused on *in order to accelerate the shift to fair, humane, healthy, sustainable food systems*’, rather than focussing on narrow definitions of productivity and resource efficiency.

24. We would urge Defra and UKRI to read our recent publication - ‘*For whom? Questioning the food and farming research agenda*’³ – in full. This collection of articles from a range of experts addresses key questions about how the research agenda is set in food and farming, unmask and challenges the dominant research paradigm, and highlights inclusive alternatives to deliver public good. In doing so, we seek to challenge accepted opinion and spark fruitful debate about the future food and farming research agenda.

25. There are enough ‘hockey stick’ graphs – of climate change, biodiversity loss, obesity and other negative products of the current industrial food system – to make the case for proper investment in long-term solutions and an appropriate, inclusive, ethical food and farming research agenda. Yet, the evidence has been ignored.

26. The scientific quality of most UK food and farming research is very high. Much food and farming research is arguably supporting current industrial food and farming quite well. However, flaws in the current food and farming systems mean too often research is being asked for that delivers for private gain, rather than public good. There are also serious issues about the research agenda – like what is researched and how the use of its products are regulated – that are seldom questioned.

27. The ‘status quo’ industrial research paradigm needs an overhaul. It suffers from too often having a narrow agenda, undue corporate influence, opaqueness and too much emphasis on immediacy, rather than supporting long-term approaches. It is also often based on questionable underlying assumptions, such as ‘food production has to increase by 70% by 2050’ and similar statements that are often recited without question. Those driving the research and industrial innovation agendas are too frequently operating without addressing fundamental ethical questions about the wider purpose of the research and what its social and environmental implications are.

³ <https://www.foodethicscouncil.org/research-agenda.html>

28. A progressive research agenda needs:

- **Serious investment in transformational research** that benefits the world's main food producers (particularly smallholders), citizens, animals, the environment and future generations – in the UK's international research footprint and at home
- **Radical transparency** – including from UKRI on funding sources, potential conflicts of interest, agenda setting processes and underlying assumptions behind any research
- **A genuinely inclusive approach** – including farmer-led and community-led research, not simply that imposed from industrial food systems
- **The products and intellectual content, and their derivatives, of (especially) publicly-funded food and agricultural research to be kept in the public domain**
- **Proper application of the precautionary principle** – a post-Brexit UK needs effective and appropriate levels of regulation in place, especially for technologies used in food and farming, including new biotechnologies such as synthetic biology and gene editing.

29. We need an inclusive research setting process, a transparent research agenda and the application of research that contributes towards food systems that are fair, humane, healthy and environmentally sustainable. We need a paradigm shift towards agroecology and other approaches that value people, planet and animals. Defra and UKRI can play a vital role here.

30. There is an urgency to all this that is often neglected. We need urgent responses to the 'knowns' of climate change, biodiversity loss, obesity and hunger. We urgently need to build resilience for the 'unknowns' too. Food and farming research should be designed to help achieve the Sustainable Development Goals.

Q. How can industry and government put farmers in the driving seat to ensure that agricultural R&D delivers what they need? Please rank your top three options by order of importance: a) Encouraging a stronger focus on near-market applied agricultural R&D b) Bringing groups of farms together in research syndicates to deliver practical solutions c) Accelerating the 'proof of concept' testing of novel approaches to agricultural constraints d) Giving the farming industry a greater say in setting the strategic direction for research funding e) Other (please specify)

31. We consider all the options listed to be important.

Q. What are the main barriers to adopting new technology and ideas on-farm, and how can we overcome them?

32. No comment

Labour: a skilled workforce

Q. What are the priority skills gaps across UK agriculture? Please rank your top three options by order of importance: a) Business / financial b) Risk management c) Leadership d) Engineering e) Manufacturing f) Research g) Other (please specify)

33. No comment

Q. What can industry do to help make agriculture and land management a great career choice?

34. See answers above to question on 'the most effective ways to support new entrants and to encourage more young people into a career in farming and land management'.

35. There is a case for reintroducing a new form of sector bargaining, with Wales and Scotland having already recognized the benefit of doing so and having Agricultural Wages Boards in place. These help tackle in-work poverty, which is a serious issue in the agricultural sector and the broader food industry.

Q. How can government support industry to build the resilience of the agricultural sector to meet labour demand?

36. No comment

SECTION 5: Public money for public goods

Q. Which of the environmental outcomes listed below do you consider to be the most important public goods that government should support? Please rank your top three options by order of importance: a) Improved soil health b) Improved water quality c) Better air quality d) Increased biodiversity e) Climate change mitigation f) Enhanced beauty, heritage and engagement with the natural environment

37. We find a ranking exercise unhelpful here as different people will have different subjective judgements on what environmental outcomes are most important, and ultimately they are all interlinked.

38. We believe the government should support a range of environmental – and other – public goods and that a systems approach is needed. This might for example mean a basket of outcomes for farmers to deliver on, where they can be rewarded for delivering some of those public goods, with certain minima needing to be achieved in order to trigger financial payments.

Q. Of the other options listed below, which do you consider to be the most important public goods that government should support? Please rank your top three options by order of importance: a) World-class animal welfare b) High animal health standards c) Protection of crops, tree, plant and bee health d) Improved productivity and competitiveness e) Preserving rural resilience and traditional farming and landscapes in the uplands f) Public access to the countryside

39. We find this ranking exercise unhelpful, along similar lines to the question above. We feel all the options listed above are important, with the exception of a narrowly defined version of ‘improved productivity and competitiveness’, which we feel should not be treated as a public good. We believe that world-class animal welfare is particularly important, as noted elsewhere.

Q. Are there any other public goods which you think the government should support?

40. One public good that we feel is particularly important for the government to support is **public health**. Whilst ‘health’ is mentioned in the title of the command paper, human health is conspicuous by its absence in the body of the paper, which we feel is a missed opportunity.

41. We believe public health should be supported by future food and farming policy, and recognised as a public good. We support Sustain’s position that we need to see public health as a specific ‘purpose’ in the Bill and Sustain’s suggested measures, which include - but are not limited to – contributing to healthy, sustainable diets; better household food security; improved nutritional profile of agricultural products; cessation of the prophylactic use of antibiotics in livestock farming; reduction of pesticide use; and policy and contractual requirements for fresh, healthy and sustainably produced food in public sector institutions.

SECTION 6: Enhancing our environment

42. No comment on questions in this section

SECTION 7: Fulfilling our responsibility to animals

Q. Do you think there is a strong case for government funding pilots and other schemes which incentivise and deliver improved welfare?

43. Yes, there is a strong case for government funding pilots and other schemes which incentivise and deliver improved animal welfare. In a morally progressive society, good farm animal welfare is an important end in itself. We should respond to the challenges presented by today’s farming methods, recognising sentience and the importance of the five freedoms, but also act to build positive welfare models. It is important to recognise that each animal is an individual, not just a member of a herd or flock.

44. The Food Ethics Council also believes that good farm animal welfare is essential if we are to deliver in-the-round environmental progress. Genuine sustainability must take account of environmental, social, and economic dimensions – for example soil fertility, farm animal welfare, well treated and well trained staff, and the market for quality food. It is extremely difficult to achieve good environmental outcomes while

continuing to keep farm animals in the most intensive farm systems, which rely heavily on high protein feeds produced in arable monocultures, on high levels of fossil fuel and water use, and on routine medications often including human-critical antibiotics.

45. We strongly recommend that government uses the Agriculture Bill to **standardise key sustainability metrics**. We also recommend a national sustainability metrics database, which will allow food chain stakeholders and government to analyse and drive progress.
46. Standard metrics will allow farmers, food businesses, public sector procurers, and government to analyse the success of inputs in providing good welfare. Metrics - relating to both inputs and outcomes - will help improve farm efficiency and profit potential, and empower farmers to plan and deliver their own welfare changes. Progress is most rapidly achieved when farmers are able to benchmark themselves against peers. Metrics would also enable the UK to more easily benchmark itself against other nations. We believe that a metrics-based approach will be most effective if required at national level as there is little evidence that the market has either the knowledge or willingness to move independently.
47. Inputs and outcomes are both important. Farm systems and other inputs are a key determinant of a producer's ability to achieve good welfare, while outcome measures provide a basis for analysing success and identifying where improvements to resources such as housing, space allowance and enrichment are necessary in order to improve outcomes.
48. Farm animal welfare metrics should be considered from birth to death on a species by species basis, but the core principles are common and can be used to help ensure a good life for all farm animals. We support the Farm Animal Welfare Council's Good Life Framework, and believe that to obtain an accurate picture of welfare, outcome measures should focus on:
 - Mortality
 - Disease (including the use of antibiotics)
 - Injury (including bruising, feather pecking, and mutilations such as tail docking)
 - Mobility (for example, gait scores)
 - Behaviour (an animal's ability to display behaviours, which meet their welfare wants and needs - the bed-rock of farm animal welfare science)
 - Welfare during transport and at slaughter should be included in a national metrics approach and the use of both input and outcome measures introduced for all slaughter methods. Slaughter metrics should cover transport, lairage, handling, and slaughter itself.
49. Inputs such as the quality of resources such as housing, space allowance, enrichment materials, air quality and stockmanship should also be measured as it is resources such as these that determine welfare outcomes. These inputs can also provide a helpful proxy measure for behavioural outcomes that are more difficult to collect efficiently.
50. While we believe that a national approach to metrics is extremely important, we believe that these measures should be considered and implemented as part of a broader strategy to improve farm animal welfare. For example, we also urge the government to introduce financial incentives to reward farmers who achieve higher welfare standards, and mandatory method of production labelling so that citizens are able to drive standards from the market place. In this way, government and citizens will provoke systemic change, away from the most intensive farming methods.

Q. Should government set further standards to ensure greater consistency and understanding of welfare information at the point of purchase? Please indicate a single preference of the below options: a) Yes b) Yes, as long as it does not present an unreasonable burden to farmers c) Perhaps in some areas d) No, it should be up to retailers and consumers e) Other (please specify) *if you answered 'perhaps in some areas', please elaborate.

51. (a) Yes, the government should set further standards on animal welfare, including to ensure greater consistency and understanding of welfare information at the point of purchase. This should include mandatory method of production labelling as noted above. Such transparency will benefit end customers

and will drive further improvements along food value chains, and should contribute to shifting methods of production towards higher welfare schemes over time.

52. A twin approach is needed of 'raising the ceiling' and 'raising the floor' in relation to animal welfare standards and practice.

Q. What type of action do you feel is most likely to have the biggest impact on improving animal health on farms? Please rank your top three choices from the below list, in order of importance: a) Use of regulation to ensure action is taken b) Use of financial incentives to support action c) Supporting vets to provide targeted animal health advice on farm d) Making it easier for retailers and other parts of the supply chain to recognise and reward higher standards of animal health e) An industry body with responsibility for promoting animal health f) Research and knowledge exchange g) Transparent and easily accessible data h) An understanding of animal health standards on comparable farms i) Other (please specify) j) N/A – Cannot rank as they are all equally important.

53. No comment – other than noted above

Q. How can the government best support industry to develop an ambitious plan to tackle endemic diseases and drive up animal health standards?

54. No comment – other than noted above

SECTION 8: Supporting rural communities and remote farming

55. No comment on the questions in this section

SECTION 9: Changing regulatory culture

56. Government initiatives to reduce regulation have given disproportionate weight to the policy aim of reducing regulatory costs to businesses. This has too often come at the expense of beneficial societal outcomes, and risks undermining the achievement of wider public policy goals. There is little public support for further deregulation. When the public are consulted they are, in fact, supportive of strong protections. We believe that regulation needs to be addressed on a case-by-case basis, rather than assuming that a regulation-light model (or indeed a regulation-heavy model) is necessarily the answer.

57. The Government's deregulatory agenda has strongly emphasised the perception of regulation as a 'burden'. We consider this rhetoric to be unhelpful, given the important role regulation can play, particularly in the food and farming sectors. It is also misleading, given that the UK is one of the least regulated countries in the developed world. The financial savings from deregulation initiatives are not always as significant as claimed. The National Audit Office (NAO) calculates that initiatives brought forward by the 2010-15 government saved the average UK business just £400.

58. These problems are compounded by the significant loss of enforcement capacity across regulators and local authorities, which risks having profound effects, including on food safety, public health and environmental protection. It is imperative that this issue is placed at the heart of any consideration around what constitutes 'effective' regulation. Failure to ensure that these bodies have appropriate powers and resources to perform their duties will undermine any attempt to bring about effective regulation for the benefit of all of society.

59. We would like to see the One-In-Three Out procedure (and its predecessors, the One-In-One Out and One-In-Two Out procedures) be scrapped and replaced with a case-by-case appraisal process which considers regulations based on their merit for wider society.

SECTION 10: Risk management and resilience

60. No comment on the questions in this section

SECTION 11: Protecting crop, tree, plant and bee health

61. No comment on the questions in this section

SECTION 12: Ensuring fairness in the supply chain

Q. How can we improve transparency and relationships across the food supply chain? Please rank your top three options by order of importance: a) Promoting Producer Organisations and other formal structures? b) Introducing statutory codes of conduct? c) Improving the provision of data on volumes, stocks and prices etc.? d) Other (please specify)?

62. We welcome the reference to ensuring fairness in food value chains, which is hugely important. Improving transparency and relationships across food value chains is hugely important – and each of the options suggested could help here. We recommend our landmark publication ‘Food Justice: the report of the Food and Fairness Inquiry⁴’ on this issue. This sets out three different perspectives on social justice: ‘fair shares’, or equality of outcome; ‘fair play’, or equality of opportunity; and ‘fair say’, or autonomy and voice.
63. As part of the Groceries Code Action Network, we support Sustain’s response here, namely that “the UK Agriculture Bill should deliver the opportunity to introduce a new code of conduct to support fairer purchasing practices in the parts of the agri-food supply chain not covered by the GSCOP [Groceries Supply Code of Practice].”. We continue to argue the case for further extending the remit of the Groceries Code Adjudicator, to at least cover UK-based suppliers and farmers, rather than just first tier suppliers of the largest supermarket chains. We recognise the government recently decided not to do this, but we would urge the government to reconsider this decision, not least in light of the recent announcement of the proposed merger of Sainsbury’s and Asda, which (if allowed) would increase the power of the largest players still further.
64. It is important to learn from other countries who are trying to tackle issues of unfairness in food supply chains. For example in France, President Macron has initiated debates amongst 35 value chains about how there can be a fairer share of value, particularly for farmers. The ‘head-on’ tackling of the issue of ‘fair share’ is important. The conclusion from some French food businesses has been that a redistribution of value along chains needs to be accompanied by the creation of more value along food chains (which in some cases may mean higher prices at the checkout). It should be noted that the approach adopted in France could be further strengthened by challenging the extent to which those products/ supply chains contribute to healthy, sustainable diets in the first place.

Q. What are the biggest barriers to collaboration amongst farmers?

65. No comment

Q. What are the most important benefits that collaboration between farmers and other parts of the supply chain can bring? How could government help to enable this?

66. There are many benefits that collaboration between farmers and other parts of the supply chain can bring. These include, but are not limited to, long-term partnerships providing long-term viability and security; sharing of best practice, including on environmental and animal welfare practices; pooling of investment that deliver environmental, animal welfare or social benefits; sharing of similar values-based approaches. Government should help enable this by incentivising farmers and other parts of the supply chain, particularly in sectors such as horticulture, to collaborate and to invest.

SECTION 13: Devolution: maintaining cohesion and flexibility

No comment on the questions in this section

SECTION 14: International trade

Q. How far do you agree or disagree with the broad priorities set out in the trade chapter?

67. Many of the objectives and initiatives proposed in the ‘Health and Harmony’ paper could help reduce the negative – and maximise the positive – environmental impacts from farming, which would be welcome. However, these risk being undermined by the objective on P.63-64 that states “*We will adopt a trade approach which promotes industry innovation and lower prices for consumers*”. This one sentence is

⁴ <https://www.foodethicscouncil.org/uploads/publications/2010%20FoodJustice.pdf>

worrying, as it opens the door for the UK Government to negotiate trade deals that risk the called-for 'excellence' of UK food and farming being undercut by low quality imports. We must have a race-to-the-top, not a race-to-the-bottom. An objective of having lower prices for consumers could be interpreted as meaning buying food from overseas at lowest monetary cost. This however ignores the failure of our current economics to account for the true cost of food – on human health, ecological sustainability of production systems, animal welfare and social issues such as labour terms and conditions of food system workers.

Q. How can government and industry work together to open up new markets?

68. No comment

Q. How can we best protect and promote our brand, remaining global leaders in environmental protection, food safety, and in standards of production and animal welfare?

69. The brand should be built around **excellence** – farming excellence, plus excellence in environmental protection, food safety, standards of production and animal welfare, and treatment of workers in the food system. One way to further strengthen the 'Great British food' brand would be knowledge exchange between the UK and countries leading the way on approaches to sustainable food and farming. This should include, but not be limited to, France. President Macron recently unveiled a €5bn investment plan for France's agricultural sector. As part of that, he urged farmers to embrace a 'cultural revolution' and move away from EU subsidies and intensive production methods. France is seemingly leading the world when it comes to sustainable food and farming, coming top of the recent Food Sustainability Index ('FSI'), by the Economist Intelligence Unit and the Barilla Center for Food and Nutrition. This compared 34 countries on a basket of measures (outcomes and policy responses) relating to food loss and waste, sustainable agriculture and nutrition. In contrast, the UK only came 8th out of the 10 European countries included in the FSI. Our recent Business Forum write-up sets out some of the lessons that can be learned from France⁵.

SECTION 15: Legislation: the Agriculture Bill

Q. How far do you agree with the proposed powers of the Agriculture Bill?

70. We would like the Agriculture Bill to be redesigned as a Sustainable Agriculture and Food Bill, and that this be embedded within a broader sustainability and climate change framework – to ensure UK food and farming fulfils its obligations as part of both the Sustainable Development Goals and Paris climate change agreement.

Q. What other measures might we need in the Agriculture Bill to achieve our objectives?

71. We support Sustain's proposals here, namely that the objectives of the Bill also include:

- A remit to support healthier sustainable diets, including enforcing high public sector procurement standards and ensuring public money supports production of healthy produce and transition to healthy produce
- Ensuring quality of farm employment via powers to ensure the protection and advancement of farm workers via a new joint negotiating body
- Promoting farm diversity – via measures to assess the resilience of the farm structure and measures to enable a diversity of farm sizes to flourish, crucially including small farms
- Fair supply chain – powers to deliver measures to proactively evaluate and address unfair trading practices in the whole supply chain on an ongoing basis
- Whole farm systems delivery – measures to promote whole farm systems which deliver multiple benefits.

⁵ https://www.foodethicscouncil.org/uploads/publications/180321_Lessons%20from%20France%20-%20Business%20Forum%20write-up_FINAL.pdf