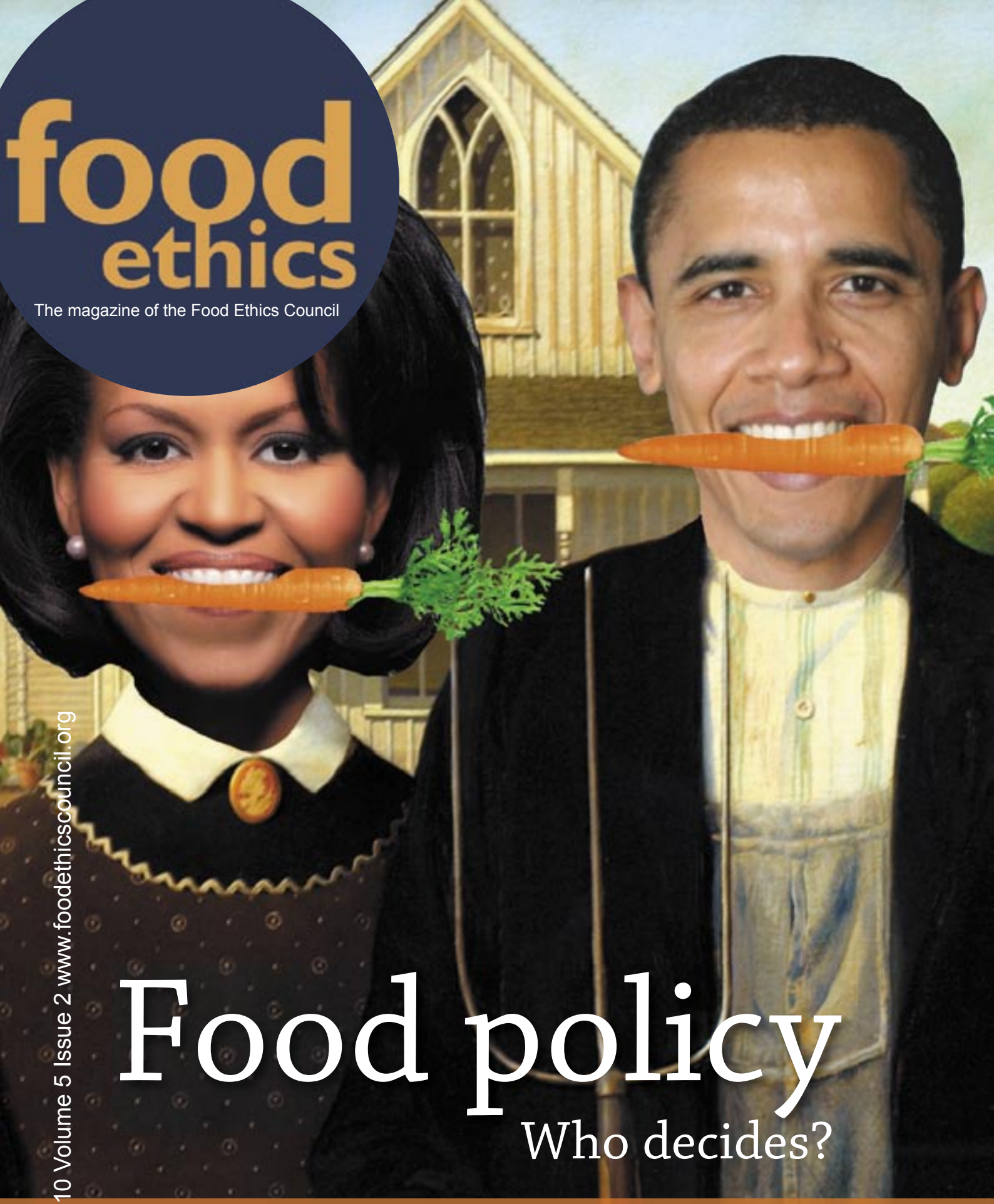
food ethics
The magazine of the Food Ethics Council



Food policy

Who decides?

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David Barling | Hilary Benn | Peter Bryant | Dacian Ciolos | Sue Davies | Alethea Harper
Michael Heasman | Eric Holt Giminez | Andrew Jarvis | Tim Lang | Mark Lawrence
Tom Lines | Jeanette Longfield | Erik Millstone | Kevin Morgan | Michel Pimbert
Pete Ritchie | Geoff Tansey | Jack Thurston | Colin Tudge | Flavio Valente

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FOOD ETHICS COUNCIL

Food Ethics, the magazine of the Food Ethics Council, seeks to challenge accepted opinion and spark fruitful debate about key issues and developments in food and farming. Distributed quarterly to subscribers, each issue features independent news, comment and analysis.

The Food Ethics Council challenges government, business and public to tackle ethical issues in food and farming, providing research, analysis and tools to help. The views of contributors to this magazine are not necessarily those of the Food Ethics Council or its members.

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A new era for food policy?

For people working on food in the UK, it is timely to reflect on how policy can make a difference. At the start of 2010 we had the 'Food 2030' report, capping a succession of official reviews that began three years ago. But now we have a new government, what is the future for food policy in the UK?

In this edition, we look to past experience and to other countries, offering some pointers to our fledgling coalition government on how to make good food policy. The articles that follow suggest some dos and don'ts...

Do base your policy on good evidence. Mark Lawrence (p.26) describes how weak evidence has stalled policy in Australia, where the last national adult diet survey was in 1995. Understanding what people do, eat and why – using social science, in particular – is crucial to making workable policy.

Don't hide behind the evidence. As Erik Millstone (p.8) shows, using evidence in regulatory decisions requires evaluative judgements about the quality and importance of the information available, about levels of uncertainty, and about trade-offs between competing objectives. Appeals to 'evidence-based policy' often shield these judgements from scrutiny.

Do listen to different people. Even avowedly open policy processes, involving lots of consultation, can be a closed shop in practice: the usual 'stakeholders' meet again and again in the same rooms with more or less the same agenda. These are decisions that affect many people's lives, in which few have a say. Actively identifying and involving those who are usually left out – whether through farmers' juries in Mali (p.24) or Food Policy Councils in the USA (p.20) – makes for fairer, more creative and more responsive decisions. These, according to Pete Ritchie (p.28), are the qualities that policy-makers should aspire to.

The results of listening can be seen on the White House lawn. The campaign for an organic garden at America's most prominent address has been waged effectively by Kitchen Gardeners International (who kindly provided our front cover) and others. Michelle Obama's willingness to hear those voices has motivated her to tackle food poverty, obesity and sustainable farming. The First Lady's garden may or may not result in changes in legislation, but it's already got people talking about the best way to feed the US. And it's got the food industry listening too (Heasman p.12).

Don't, however, confuse this kind of listening with market research. Large food businesses – particularly supermarkets – have fantastically detailed information about what shoppers do and why. But even the best quality research is no substitute for participation. What's more, a lot of this knowledge is proprietary and its owners can tell you the bits they want you to hear. So when US food companies hail weaker rules on health claims as "a victory for American consumers" (p.10), I rather trust the consumer groups who say that's nonsense.

Do respect people's choice. It is easy to caricature UK policy debates as a fight between companies wanting to offer consumers more choice, and health and environmental consumers trying to take choice away. But that's the lazy option, explains Kevin Morgan (p.12). This is really a battle over the quality of choice, not its quantity.

So don't assume that more products on the shelves means that people have better choices. When it comes to the ingredients and environmental impact of those foods, there is sometimes little to tell between them. How transparent businesses are prepared to be about the food they sell – how it is made and where it comes from – is a much better gauge.

Do recognise that effective food policies have to reach far beyond the food sector. Making progress on issues like hunger, food security and sustainable farming depends on changes in economic policy, international trade agreements (p.14) and social welfare. For example, Flavio Valente (p.22) reports how the successes of Brazil's Zero Hunger Strategy have hinged not only on school feeding but also wider broader social security, in the form of family cash transfers reaching 57 million people. However, don't treat food like any other industry. As Kevin Morgan (p.12) underlines, food is not only exceptional because we eat it, but also because the livelihoods of some of the poorest people in the world depend on agriculture.

How did the last UK government measure up against all this? David Barling and Tim Lang (p.4) label it "hesitant". They say government has been more confident of its role recently than seven years ago, when they dubbed it the "the reluctant state", but is still opting to "clarify, define and measure" rather than intervene. For Andrew Jarvis (p.30), it should now "look to action and implementation", which seems a polite way of saying "get on with it".

We hear similar calls for government to act echoed throughout our work at the Food Ethics Council. While we're used to public interest groups calling for intervention, we now also find growing demand from the private sector for government to show leadership. Businesses and trade associations are running up against threats to their reputation or supply chains that they cannot address singlehandedly.

Here leadership means providing a clear vision of how best to square difficult issues in the public interest, transforming the market through public procurement and influencing the international policy agenda. On some issues the demand is even stronger – for new regulation or tighter enforcement to level the playing field and reduce volatility. If the food industry's agenda ever was as simple as deregulation, cutting red tape and shrinking government, it is now certainly more nuanced and government needs to catch up.

We expect the new government to be as anxious as the last about how its actions affect business. As it settles in, one of our priorities will be to highlight the strengthened mandate it has from business to act, as government should, in the broader public interest.

Food policy in the UK

Reflections on Food 2030, its past and future

DAVID BARLING and **TIM LANG** chart the highs and lows of food policy making in the UK since 1997.

Food 2030 was presented early in 2010 to set "out the Government's vision for a sustainable and secure food system for 2030 and the steps we will take to get there".[1] The Department for Environment, Food and Rural Affairs (Defra) heralded the release of Food 2030 as the signature statement to a portfolio of food policy papers and some institutional reforms under Prime Minister Gordon Brown's leadership.

The portfolio included a set of new metrics of sustainable food indicators matched against a set of food security indicators and an assessment of Britain's food security. [2] Defra was assigned the lead co-ordination role for food policy across the different government departments and agencies, as well as with the territorially devolved governments, including at Cabinet sub-committee level.

Within Defra, a Council of Food Policy Advisors was created in late 2008 to advise the Minister, alongside a new Food Policy Unit. Meanwhile, under devolution the Regional Governments in Scotland and Wales have been working out their own food strategies.

What can we surmise from this recent flurry of government activity? What are the demands that food policy brings to Government?[3] What is the nature of Britain's Food Policy and where is it headed? Is it adequate?

On the election of Labour to power thirteen years ago, the Blair Government's main food priority was to tackle food safety. It had witnessed the damage to the Tories from waves of microbiological and chemical contamination stories, culminating in the e coli outbreak in Wishart, Scotland.

Labour saw the solution in creating an independent Food Standards Agency, tasked to police the more obvious ills of modern food production and manufacture on behalf of the consumer. Here there were some echoes of 19th Century tussles over basic food adulterations and environmental public health diseases which had similarly weakened consumer trust in food supplies. They too had ended in institutional and legal reforms, but then with powers to local authorities.

The Food Standards Agency, launched in 2000, also signaled a focus on the consumer in the market place as a vehicle for achieving food policy goals. After tensions over its remit – narrowly microbiological or wider public health – its ethos was set as advising the consumer to make choices that would in turn manage and ameliorate the negative impacts of the contemporary food supply.

If New Labour thought troubles over production were matters of the 1980s and 1990s, symbolized by the spectre of BSE transferring from livestock to the human population, it was quickly disabused. The new millennium was marked by a fresh outbreak of foot and mouth disease, exposing the complexities of market trading of livestock and its vulnerabilities to disease spread. With yet another hefty cost to the Treasury for sorting out the mess, the Government took its chance to conduct a wider ranging policy review of British farming and food.

The Curry Commission's terms of reference were framed firmly within increased trade liberalization. Reporting in 2002, Curry spawned a range of initiatives to 'reconnect' British farming and its produce to consumers, to promote the quality of British food, and to modernize the farming industry through greater collaboration and wider induction into the application of efficient supply chain management. Environmental gains were to be part of this new approach.

This state attempt to bind and modernize farming as part of a seamless, efficient supply chain had in fact begun with the earlier 1990 Food Safety Act under the Conservative Government. This thrust responsibility onto the supply chain to clean up its safety act, with the requirement to show "due diligence" to do so. De facto, this enshrined retailers as leaders of food standards; certification schemes supported with auditing systems were to raise the safety assurance of both British produce and the increasingly international sourcing of food. However, the farming industry introduced its own producer-led assurance schemes with the major ones coming to roost under the Red Tractor logo of the Assured Food Standards.

Irrespective of the ownership of such certification schemes or the competition between them, they are now the main contributors to the private governance of our food supply. The British state has used such private governance schemes as a means of steering food supply chains in order to achieve

governmental policy objectives while transferring the bulk of the regulatory costs to the private sector.

The "Leave it to Tesco et al" philosophy contains a certain strategic logic for the State but equally there are other costs. A notable one is a lack of clear public accountability. The new form of regulatory quasi-corporatism means the main trade associations of the British Retail Consortium (BRC), the Food and Drink Federation (FDF), the National Farmers Union (NFU) persuaded by the State to manage food supply through modes of private governance. The large individual food corporations in retail and manufacturing also sit within these policy networks, as do the large food service companies.

It is no surprise that the steps to achieve Defra's Food 2030 Vision, launched in January 2010 after a year or so of consultation and development, spell out an array of voluntary initiatives involving the food industry. The endorsement of these main trade associations was given prominence when the Vision was launched.[4]

The environmental impacts of food production and farming became a priority after the work of the Curry Commission. The subsequent Sustainable Farming and Food Strategy (SFFS) was a first stage in prioritising the development of a more environmentally sound set of farming practices around the protection and quality of the natural resources upon which agriculture depends: water, soil, air and biodiversity.

Defra found its voice championing food as the interaction point of issues such as eco-systems support, animal health and welfare, and the enormous challenges of climate change.[5] The prominence given to farming's environmental and ecosystem roles also fitted the reform agenda for the Common Agricultural Policy.

In the 2000s, EU farm policy moved inexorably to de-couple payments for production and towards paying for farming's 'multi functional public goods' including environmental stewardship, landscape production, rural development, animal welfare and food safety. Environmental stewardship came to the forefront of payments under the Single Payment Scheme in the 2003 CAP reform in return for cross compliance with a range of food and farming regulations covering these public goods. The SFFS was essentially a production entry point to the environmental impacts at the production and farming end of the food chain, where the evidence for the adverse impacts of farming practice had become increasingly clear.

Alongside these farm-oriented policy changes, a focus on public health also emerged which went wider than food safety. The evidence of food's impact on health had been clear from the 1970s. The Conservatives had been resistant, preferring firstly to defend big food industry, but latterly it began to think aloud via reviews such as the Nutrition Taskforce's in the mid 1990s.

P. Dalton

Labour, too, was under pressure not to intervene, hence the arguments about whether the FSA should include nutrition in its work. But this agenda opened up in the 2000s as evidence about the seriousness of the threat of obesity began to shock not just politicians but the public itself.

Pioneering work by the National Audit Office in 2001 highlighted the present – let alone future – burden on taxpayers from healthcare costs. The Chief Medical Officer called it a 'timebomb' in his 2003 Annual Report,[6] and the Health Committee ran its longest enquiry, dissecting the way no-one took responsibility but everyone was involved. The Chief Scientist's Foresight report was the straw that broke the camel's back. Financial and medical costs were spiraling, with Foresight arguing that obesity could not be tackled by pursuing single solutions. Its complexity exposes systemic failure.

At the same time, the role of school meals as symbols of young people's inappropriate eating was set alight by the 2005 Jamie Oliver TV series. Showing the normality of poor diets in young people – hardly the all-knowing, informed consumers exerting power in the market place – stung the Blair Government into responding with tougher standards, a new School Food Trust, and £0.3 bn available to improve quality. That grinding process continues.

The coincidence of food's health and environmental impact further validated the argument that what the country needed was a more integrated food policy. Gordon Brown surprised many when the first request he gave to the Cabinet Office Strategy Unit as Prime Minister in summer 2007 was a review of food policy. The Food Matters report, published in 2008, was endorsed by the Cabinet, [7] and set in train the policy papers that emerged in 2010. These institutional acknowledgements were encouraged by the rocketing of global commodity prices in 2006-08.

Food security became a mainstream UK issue, not just a concern of development lobbies. As oil hit $100 a barrel – remember that 20th century 'efficiencies' are mostly oil-dependent – a new agenda of fundamental questions emerged. What is land for? Why is so much food imported that could be grown here? Why isn't more food grown in the UK? Is it lack of skills? Or science? And why is the food labour force so lowly paid? What is the price of cheap food?

In this agenda, civil society organizations saw the beginnings of a 'joined-up' approach which New Labour claimed to champion. The gaps became obvious. Income inequalities were downplayed. The social assumptions were consumerist. Low carbon is not a cipher for environmental complexity. But a big debate had started. The Strategy Unit's work, not least in the background evidence gathering and negotiations across Whitehall and food chains, was an attempt to map out a more comprehensive approach to food policy.

> The EU as a whole is currently over 90% self-sufficient in agricultural products

One of Food Matters' strengths was its tacit proposal that supply chains ought to service complex demands for sustainable consumption. In part, this shift away from production-centredness reflected an early decision to avoid the entanglements of the concurrent CAP mid-term review. This meant, however, that the process set in train by the Strategy Unit never properly addressed the questions around how UK agriculture will grow food in an environmentally and socially sustainable manner.

The discrete 'parking' of the SFFS process reinforced this comparative silence. Defra's more recently published sustainable food indicators offer a set of metrics but not yet a comprehensive strategy for how Britain will produce its food in a sustainable way, let alone persuade its citizens to eat a sustainable diet, a notion championed by the Sustainable Development Commission and now central in Food 2030.[8]

Later this year, the Chief Scientist's Foresight report on Food Policy is due. The fissure between sustainability and raising production to address fears about an impending 'perfect storm' suggests difficult political choices ahead. [9] The economic reflex, championed by parts of Defra in league with HM Treasury, is consistent. Sweep away the CAP and place faith in international markets and sophisticated supply chains to deliver. [10] Although the price spike of 2006-08 subsided, the vulnerabilities still remain: from climate change impacts to oil shortages and the impacts upon energy inputs with escalating costs, to the growing population and its demands both for more food and more food from animal protein in the expanding urban centres of the world.[11]

Britain's food policy has a rich history. Some of today's questions are very old. The last attempt at a concerted and more integrated British food policy was in the Second World War, when politicians resuscitated and refined the War State mode of controls over food supply previously and reluctantly introduced in 1916, mid-way in the First World War. Dismantled in 1919, the return to trade-based imports left land underused while 1930s unemployment highlighted unmet needs. That's why the post Second World War policy framework was so quickly put in place. Under the War State, there was micromanagement of both production and consumption (think rationing), as an exhibition currently on in London's Imperial War museum illustrates.

By the end of rationing in the mid 1950s, the dominant feature of food policy was the continuing state support for agriculture and the drive to greater domestic food production. Yet when, in 1939, Le Gros Clark and Titmuss had spelt out the vulnerable state of Britain's food security, the primary external security threat was emanating from the European continent.[12]

Today, the UK is part of the single European market and shares most of the same food and farm regulatory frameworks with 26 other member states. The European Union (EU) is the main source for both the UK's food imports and exports. The EU takes 80% of UK food exports while almost 60% of the UK's food imports come from the EU. The EU as a whole is currently over 90% self-sufficient in agricultural products (farm gate value).[13] We remain in a global trading environment but the suitability and stability of this environment is no longer as assured as it may have seemed not so long ago.

As a new Government ponders action and all parties nominally support the thinking, if not language or packaging of Food 2030, it is appropriate to ask if the policy directions are adequate and if the thinking is radical enough or appropriate for what lies ahead. A food policy informed by consumption is important; but, a consumption-led food policy based on consumer choice and consumers making the correct choices threatens to run into a policy cul de sac. Not least, when one tries to find the model consumer. Few eat the ideal healthy diet, let alone a sustainable diet.

Few companies openly subscribe to raising food prices to internalize externalized costs. Politicians are acutely aware of the need to change but fearful of the consequences. Yet how can consumers change behavior without firm leadership? If the buck passes from state to companies and consumers, will adequate change come soon enough? Or will 'events, dear boy, events' (crises) dictate belated policy response?

Back in 2003, we described the early years of the Labour Government's food policy thinking as a case of the "reluctant state". [14] After thirteen years of Labour Government and vibrant food policy debate, we now judge the present status as one of a "hesitant state". Government is engaged but remains unsure of how to act, opting to clarify, define and measure. Government leadership is given via the uneasy combination of exhortation and reliance on key actors in the supply chain, dressed up as co-operation and partnership. How will they all be brought back into a joined up food policy?

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Is food policy evidence-based?

From BSE to food colouring, **ERIK MILLSTONE** explores the sometimes controversial relationship between policy and evidence.

When seeking to justify their policy decisions, especially in areas like food safety and food security, policy-makers frequently represent those decisions as 'evidence-based', and in particular as based on 'sound-science'. From the policy-makers' perspective, that rhetorical tactic may help to protect their judgements and decisions from critical scrutiny. Government ministers certainly prefer to portray policy decisions as evidence-based, rather than admitting when they were either arbitrary or selected to serve particular social interests.

To some members of the general public, portrayals of policies as evidence-based may be reassuring. To the people who produced the preferred evidence, the tactic portrays their expertise as superior to that of all others, suggesting that no-one but an expert can legitimately criticise their knowledge or expertise.

Rhetorical appeals to 'evidence-based' policies became especially conspicuous in the statements of government ministers and senior officials in the aftermath of the BSE crisis, which erupted in the UK on 20 March 1996. That development provided an implicit admission that much policy, especially over BSE, was not only **not** 'evidence-based', but was actually contradicted by much of the available evidence.

From 1986 to February 1996, ministers and senior officials had frequently claimed that British beef was entirely safe, despite the fact that expert advisors had repeatedly indicated that the available evidence did not support those claims.[1] The trouble with suggestions that policies can be fully legitimated by being 'evidence-based' is that, however superficially attractive they may seem, they can never be true.

Policy questions, even when they refer to issues such as food safety that are highly dependent on scientific understandings and evidence, are never issues that can be decided purely by reference to facts. In practice, the available evidence is almost always incomplete and equivocal, so expert knowledge is uncertain and frequently contested by other experts.

Critically however, even if the uncertainties could be not just diminished but eradicated, factual evidence on its own could never settle policy issues. Policy issues about – for example – EColi 0157, GM crops, pesticides, preservatives, veterinary medicines, synthetic hormones, food colourings or artificial sweeteners are all concerned with the acceptability of trade-offs between risks and benefits; they are not concerned solely with the magnitude of the anticipated benefits or risks. They are social and evaluative judgements about the acceptability of compromises; they are intrinsically evaluative judgements, not factual ones. Those evaluative or ethical judgements need to be informed by indications of what is known, and not known, about possible risks and benefits; but however reliable those indications may be they cannot adjudicate the trade-offs.

In practice, the relationships between the available evidence and policies that purport to be based on that evidence are often even more complex than the discussion above implies. When 'evidence' is reported, and especially when it is interpreted for policy, those reports and interpretations are often covertly informed by policy assumptions that are typically implicit and unacknowledged. An example may serve to illustrate this claim.

Food colours and child hyperactivity

Evidence that some food additives, and in particular synthetic dyes, might trigger hyperactive behaviour in some vulnerable babies and children has been available, and has accumulated, since the late 1960s.[2] In the 1960s and 1970s, that evidence was often commercially and officially discounted as errors of parental or teachers' judgements.

In the 1980s, it was suggested that, as similar symptoms could not be observed in laboratory rats or mice, any problems were a consequence of individual idiosyncrasies, not the responsibility of the food additives, or the food manufacturers.[3] That lack of concordance between human symptoms and animal studies might just as easily have been interpreted as indicating the limitations of laboratory animals as models for detecting adverse effects on human consumers, but numerous blind eyes have been turned to that interpretation, in part because its implications were and remain too threatening; they undermine the status quo.

In 2007, Stevenson and colleagues published the results of a rigorous study of the effects of two mixtures of six colours, in combination with a preservative (sodium benzoate), on two groups of children on the Isle of Wight, one of three-year olds the other of eight-nine year olds.[4]

That study provided statistically significant evidence from a randomised, double-blinded, placebo-controlled, crossover trial that a significant proportion of normal children showed consistently poorer behaviour after exposure to coloured soft-drinks of the sort that are readily available and widely consumed. The response of the official expert advisory bodies and policy-makers cannot accurately be characterised as 'evidence-based', in spite of their efforts to portray it in those terms.

Consumer representatives, for example at Which?, the Food Commission, and Sustain, interpreted the evidence as providing sufficient grounds for banning all six of the colours, for restricting the use of sodium benzoate, and for an urgent programme of research to conduct similar tests with all the other synthetic colours permitted at the time.

The UK's Committee on Toxicity, however, characterised the evidence as inconclusive, even though it was the most methodologically rigorous study ever conducted on the subject.

The Food Standards Agency's Board judged the evidence to be insufficient for any regulatory restrictions on the colours or mixtures. Instead, the FSA's website just provided some limp advice that only concerned children who had already been thought to be hyperactive, even though the study was conducted on ordinary children, and explicitly excluded any that were suspected to suffer from hyperactivity.

When Downing Street made it discreetly clear to the FSA that a more precautionary and less permissive approach was deemed appropriate, the FSA Board looked again at the issue, and concluded that it would ask the food industry to stop using the suspect ingredients, but not require it to do so.

The advisory panel on food additives of the European Food Safety Authority initially reanalysed the new data and interpreted it as providing limited evidence of an adverse effect in 'some' children, but portrayed those consequences as significant only for those particular individuals and as irrelevant to the general population.[5] As the panel members were not sure of the overall prevalence of such sensitivity, they suspended their judgement on the six colours and said nothing about sodium benzoate. When pressed subsequently on the proportion that would need to be affected before the prevalence was deemed sufficient for restrictions to be imposed, answer came there none.

The EFSA panel complained that the study had used mixtures of colours; therefore responsibility could not be attributed to any particular compound. The possibility that mixtures might exert effects that could not be attributed to single ingredients was apparently outside the panel's limited frame of reference.

The EFSA panel concluded that there were no grounds for changing its recommended 'acceptable daily intakes' (or ADIs) for the six colourings.

That response was based on some curious reasoning. ADIs have routinely been defined by reference to the results of studies with laboratory animals, but the new data came from a study of children, rather than rats. Once again, a no less reasonable response might have been to conclude that animal studies cannot provide a suitable basis for judging these compounds, in particular in respect of symptoms that rats and mice fail to exhibit.

Once again as in the UK, there was political pressure on EFSA from the Commission and governments of several EU Member states to think again. Consequently the EFSA Panel was re-convened. On that occasion the panel looked at data from animal studies that had previously been available, but which had not been properly reviewed. The panel concluded that it should reduce the ADIs for three of the six colours, but otherwise did not modify its interpretation of evidence from studies on children. The EFSA panel even acknowledged that some children might react adversely to exposures to synthetic colours at levels below the panel's designated 'acceptable daily intake', but implied that this was 'acceptable' as it could be attributed to the sensitivity of the unfortunate individuals; as if it had nothing to do with the synthetic colours.[6]

In this discussion of responses to evidence from expert advisory committees and policy-makers, we are confronted by a broad spectrum of possible interpretations and responses to an evolving body of evidence. The diverse interpretations reflected a range of competing non-scientific assumptions about how much of which kinds of evidence should be deemed relevant and variously necessary and/or sufficient to permit, restrict or forbid the industrial and commercial use of food additives, especially cosmetics such as colourings.

This example also reveals that the interpretations varied in accordance with the extent to which the evidence was deemed persuasive, especially when comparing data from human studies with data from animals. It also depended on assumptions about the ways in which the benefits of various doubts might be allocated, in particular as between producers and consumers. This example shows that while policy-making can and should be influenced by the available evidence, and its strengths and limitations, the evidence on its own did not and cannot decide policy.

While a robust evidence base for policy decisions is eminently desirable, it is invariably misleading to pretend that food safety policy decisions, or other regulatory and policy decisions, have been based on, and only on, the available evidence.

The fact that the rhetoric of 'evidence-based policy' persists, reveals that policy-makers are often reluctant to acknowledge, and to take responsibility for, key evaluative judgements that influence what is deemed to be relevant evidence, what is deemed to be necessary and/or sufficient evidence, of judgements influencing how evidence is to be interpreted. Unless and until policy-makers take explicit responsibility for such judgements, and unless and until expert advisors learn to show whether or not they are acting in accordance with those judgements, doubts about both the scientific and democratic legitimacy of policies will persist.[7]

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The US food lobby

Politics and nutrition labels

The balance of power between the US Government and the food industry has come full circle, writes **MICHAEL HEASMAN**, and nowhere more clearly than in the wrangles over nutritional labelling.

One of the key communication spaces used to influence healthy eating practices by consumers is the nutrition label on food and beverage packaging. In this context the nutrition label is an important window on the 'push and pull' of the relationship between policy makers and food and beverage producers. This struggle is illustrated in this article through considering trends in US nutritional labelling over the past thirty years.

An historical overview of the US 'nutrition label' shines a light on the nature of the interactions between the marketing ambitions of US food producers and the goals of public nutrition policy and how business practices influence government policy and vice versa. A key lesson from analysis over this longer time-frame is that when the relationship becomes unbalanced, such as a 'hands-off' approach from government, there is the potential for consumer confusion, misleading health claims and setbacks for public health and nutrition policy – none of which help consumers make informed healthy eating choices.

After what might be described as a laissez faire policy towards nutrition labelling in US food markets over the past 15 years, 2010 is gearing up as an important period for renewed public nutrition policy intervention, including the development of new rules about what will be allowed to appear on the nutrition label.

Historical context

A seminal year in the history of the politics of nutrition labels is 1980, with the publication of the first Dietary Guidelines for Americans by the US Departments of Agriculture (USDA) and Health, Education and Welfare (as it was then). This report (since revised and published every five years) built upon the ground-breaking1977 report Dietary Goals for the U.S.. This brought together for the first time several diet-disease hypotheses and recommended quantitative goals for particular nutrients such as fat, saturated fat and cholesterol in the American diet

2010 is gearing up as an important period for renewed public nutrition policy intervention

to improve consumer health (such as preventing coronary heart disease). These reports set the foundation for today's healthy eating messages.

From a marketing perspective, dietary recommendations were important because of the emphasis on 'quantities' of nutrients. On the one hand, this opened up the use of nutrition labelling as a means of communicating such information and prompted the evolution of nutrition claims and labelling as the core of food and beverage marketing practice as it stands today.

On the other hand, those industry interests that saw their 'nutrients' portrayed in a negative light contested such dietary advice (and continue to do so today, for example, over sugar).

Under the message of 'healthy eating' consumers have been urged by marketeers and public policy makers alike to comply with 'dietary guidelines, and encouraged to consider how much or how little of particular nutrients they consume. To do this, they are guided towards the nutrition label as an important source of nutritional information.

The late 1980s saw a dramatic increase in nutrition label claims on US food and beverage products. For example, by early 1989 one report suggested 40% of new product introductions bore nutrition health claims - but these claims were unregulated.

The nutrition claims marketing free-for-all of the late 1980s eventually led the government's Food and Drug Administration (FDA) to draft the Nutrition Labelling and Education Act (NLEA) of 1990 (implemented in 1994). Among the provisions of the NLEA was the mandatory requirement for virtually all products to display what has now become the iconic US Nutrition Facts panel. Previously, the NLEA nutrition labels had been 'voluntary'

USDAgov

and inconsistent, with only around 60 per cent of food labels disclosing any nutrition information at all such as fats, calories, carbohydrates, etc.

As the market for 'healthy eating' and 'wellness' continues to grow in the U.S., the food industry has been keen to extend its marketing 'pull' through the nutrition label. In particular, from the mid-1990s onwards, the holy grail of nutrition marketing has been the goal of making a nutrition-related 'health claim'(a 'health claim' being a statement connecting a food, food component, or a nutrient to a state of desired health). Thus the new politics of 'quantified' US nutrition labels can be described as how much 'extra' of a nutrient or ingredient is needed in a food or beverage product to trigger a claim about a desired health outcome, and how should this information or 'health claim' be conveyed to consumers without misleading or confusing people.

While the NLEA made provision for the approval of health claims, an intriguing issue in the 'push and pull' of policy has been how to decide what constitutes 'sound science' in supporting nutrition-related health claims. Under the original provisions of the NLEA the only health claims permitted were those first approved by the FDA. However, by 2003, policy had been changed from requiring pre-marketing approval based on the "totality of the publicly available scientific evidence", to claims based on an "authoritative statement", to "qualified claims" based on the "weight" of scientific evidence without needing prior FDA approval.

An interesting aspect of these policy changes has been the industry appealing to First Amendment rights. Arguing the First Amendment right of commercial free speech entitles companies to make health claims.

When the FDA allowed 'qualified' claims on food and beverage products in 2003, food industry associations hailed it as "a victory for American consumers". However, some health and consumer groups were less convinced, arguing that the changes would encourage "confusing and misleading" nutrition claims.

Which brings us to 2010. After 15 years of a relatively liberal nutrition labelling policy commentators such as Nestle and Ludwig (2010) state: "At no point in US history have food products displayed so many symbols and statements proclaiming nutrition and health benefits".

So, perhaps not surprisingly, regulatory agencies are once again re-focusing their energies onto nutrition labels, in particular 'front-of-package' food labels – which is where most food and beverage companies place their 'health claim' messaging. The excesses of this unprecedented nutrition marketing and labelling activity have been exposed consistently by some nutrition advocacy groups. Most recently, for example, in December 2009, a hard hitting report by the Center for Science in the Public Interest called for labelling reform.

Perhaps influenced by such research, in an open letter to industry published on 3rd March this year, FDA Commissioner Margaret Hamburg wrote: "I have made improving the scientific accuracy and usefulness of food labelling one of my priorities…" On the same day the FDA issued "warning letters" to 17 manufacturers that the labelling on 22 of

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their products violated Federal statutes. However, it should be noted that the FDA has approached the industry on nutrition label reform in a spirit of collaboration and in the context of working together.

In addition, the US Institute of Medicine, with the support of the FDA, has started a major review of 'front-of-pack' nutrition messaging, including the symbols, icons and logos that convey nutritional information to consumers. Their final report is expected later this year and will be used to influence new regulatory developments.

Adding weight to the drive to address public health nutrition has been First Lady Michelle Obama and her nationwide campaign, launched in February, with the goal of solving the challenge of childhood obesity within a generation. Her Let's Move campaign is underpinned by the public health fact that over the past 30 years, childhood obesity rates in America have tripled, and currently almost one in three American children are overweight or obese.

One aim of Let's Move is to empower consumers by providing better nutrition information, or as the First Lady cleverly put it in a recent speech: "And we're working with the FDA and the food industry to make our food labels more customer-friendly, so that parents don't have to squint at words they can't even pronounce to figure out which foods are healthy and which ones just claim to be". Following these, and other public policy interventions into the world of nutrition labels, the FDA plans to develop a new regulation proposal later this year that would define the future nutritional criteria that must be used by food companies making front-of-package claims about products nutritional qualities.

> Regulatory agencies are once again re-focusing their energies onto nutrition labels

In some respects much of the current politics of US nutrition labels is about going back to basics such as labelling calories on products. For example, in response to the Let's Move initiative, some of the nation's largest beverage companies announced that they are now taking steps to provide clearly visible information about calories on the front of their products, as well as on vending machines and soda machines – something it might be argued could have been achieved decades ago.

In this article it has only been possible to skim the surface of the complex topic of US nutrition labels over the past 30 years, but in considering this recent history there is the sense of coming full circle.

This begs the question about what lessons can be learnt from the past three decades. Can these lessons be applied to create future nutrition label policy and regulation that better marries public nutrition objectives and food and beverage marketing practices while at the same time genuinely empowers consumers?

NOTE: This article draws on a range of sources, the following were particularly useful:

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A sustainable food system
Barriers and opportunities

KEVIN MORGAN explodes the myths that shackle food policy.

Three powerful myths continue to shackle food policy. The first is the neo-liberal myth that there is nothing exceptional about food – it is just another industry like coal, steel or manufacturing. This is the perennial mantra of the World Trade Organization, where neo-liberal policy makers strive to 'normalise' the agri-food sector by subjecting it to the same free trade rules that were devised for other sectors of the economy.

The truth of the matter, of course, is that there is something unique and exceptional about food – which is that we ingest it. This is what distinguishes it from the products of every other industry, none of which is as vital to human health and well being as food. Indeed, the WTO's Doha Round of trade negotiations has stalled precisely because governments in developing countries are unwilling to liberalise their agri-food sectors for fear of being overrun by cheap (and subsidised) food from developed countries. They are unwilling, in other words, to treat their agri-food sectors as just another industry.

Rich countries in Europe and North America suffer from schizophrenia when it comes to agri-food issues. Their rhetoric in WTO negotiations is all about 'normalising' the sector, but their actions speak louder than words because their farmers are among the most subsidised in the world, proving that they also treat the sector as exceptional. Far better for all countries to explode the myth and recognise that food, especially the fresh foods that are vital to human health, should be exempt from the free trade strictures of the WTO. An agreement along these lines would allow countries to build more localised and more sustainable food economies.

The second myth that needs to be exploded is that EU public procurement regulations are a barrier to local food sourcing in schools, hospitals, care homes and the like. This myth seems to be more prevalent in the UK than in any other European country, so its noxious effects are that much more pronounced here. EU rules are designed to ensure transparency and non-discrimination in public procurement transactions, and they do not prevent public bodies from using quality criteria, like fresh, certified, organic and seasonal for example, all of which can promote local sourcing in all but name.

> The food industry deploys the concept of the 'nanny state' to keep regulators at bay

The Cornwall Food Programme has shown what can be achieved in the NHS when there is the political will and the professional competence to create appetising menus that are based on locally-sourced ingredients. Some 80% of the food in the county's hospitals is procured locally from companies based in Cornwall and the customer satisfaction rate is now 91%, the highest in the UK. One would think that other NHS Trusts would be beating a path to Cornwall's door to discover the secrets of its success. Curiously, this is not happening, which helps to explain why good practice is a bad traveller.

Sadly, the Cornish success story could be about to end. A new era of austerity, combined with so-called 'efficiency savings', threatens to reverse the little victories that have been secured in public sector food procurement in recent years. To avoid this baleful scenario, the key Cornish ingredients – political will and professional competence – ought to be part of a national recipe to get good food on the public plate for vulnerable consumers, be they pupils, patients or pensioners.

The third myth, one that is assiduously nurtured by the food and drink industry, is that food choice is a private matter. One of the insidious implications of this myth is that governments are deemed to be part of the 'nanny state' if they try to regulate in favour of a healthier food system. The food industry deploys the concept of the "nanny state" to keep regulators at bay, hoping it will do to regulators what kryptonite did to Superman.

But the food choice environment is a socially constructed environment, as the work of Marion Nestle has shown for the US and Tim Lang has shown for the UK. So governments have every right to shape a food choice environment where consumer rights are fostered rather than frustrated, especially when it comes to honest food labelling. The right to know what we are ingesting is one of the most important of all human rights.

These three myths exert a powerful effect on the food policy community at home and abroad, blocking the growth of a fairer and more sustainable food system. The sooner they are exploded the better.

Kevin Morgan, Professor of Governance and Development in the School of City and Regional Planning at Cardiff University, is a member of the Food Ethics Council.

Food policies Key trends and

The world's food security is at the mercy of global policy elites - a situation that must change, argues **TOM LINES**.

In 1943 President Roosevelt called an international conference which recommended setting up a permanent body 'to deal with the varied problems of food and agriculture, not in isolation, but together.' The conference observed that those foods which improve people's diets and health are generally produced by farming methods which maintain soil productivity and ensure reliable returns for farmers: 'In short, better nutrition means better farming.'[1] Policies for food and agriculture have to go hand-in-hand.

After the Second World War the permanent body was duly created as the Food and Agriculture Organisation (FAO). But large parts of the world have faced hunger and food insecurity ever since that time. Has the integrated food policy suggested above ever existed in poor places which are threatened by these scourges? Yes, in certain countries such as India and China, and sometimes over long periods. However, it is debatable whether it has existed at all in most countries or globally.

Plenty of policies have touched on food, some of them overlapping, others contradicting each other. The FAO and its associate, the International Fund for Agricultural Development, have made valiant efforts to promote food policies, but their influence was always weaker than other currents. Meanwhile, there has been a kaleidoscope of changing fashions in thinking on agricultural development.

Policies for food and agriculture have to go hand-in-hand

What stands out over many decades is the number and diversity of global players determining agricultural policies, and the confusion between them. Far from promoting coherent food policies, some of their initiatives inhibited or even prevented them. Most of the prevailing ideas came from aid donors, often based not on long-term food needs but other concerns such as general economic liberalisation or short-term food crisis management.

Since the 1950s, China and India stand out among major developing countries for the success of their food policies. However, both relied on intensive inputs and they aggravated tendencies to economic and social inequality.

Chinese self-sufficiency

After the People's Republic was established in 1949, one of its main preoccupations was to give land to China's many landless peasants. Mao Zedong's rule developed a sound basis for agricultural production and ensured a basic standard of living for everyone - despite big lurches along the way, such as the Great Leap Forward and the Cultural Revolution.

After Mao's death, the household responsibility system built on this foundation to diversify supply and outputs, and self-sufficiency in basic foods remains a central plank of Chinese policy. However, there is now a huge gap between agrarian and urban incomes in China, with the worst poverty concentrated in rural areas.

1970s Green Revolution

In the 1960s, India was still known for periodic famines, but this changed with the Green Revolution and government distribution systems. The Green Revolution was based on new, hybrid varieties of rice, which required large amounts of fertiliser and irrigation. This produced more food but increased inequality in the countryside. The system of government stocks and food distribution to those in need provided the elements of a welfare state. In the long run this all led to regional inequalities in agriculture as well as soil degradation in productive areas due to the overuse of chemicals.

The Structural Adjustment era

In the 1980s and 1990s, agriculture and food in the poorest countries, especially in Africa, were deeply affected by the policies of Structural Adjustment and macro-economic stabilisation imposed by the World Bank and the International Monetary Fund. This 'Washington Consensus' dominated economic policy until the millennium but progressively lost credibility after that.

With the slogan 'Get the Prices Right', Structural Adjustment was based on the idea of opening every nation up to world market forces. It was expected to produce the best results for development. Priority was given to cash crops for export, which were supposed to pay for any food imports. Any substantial role for the state in agriculture was abandoned, while imported food got access to domestic markets under the accompanying requirement to liberalise trade. The macro-economic achievements were at best patchy, and the poorest countries slid into dependence on food imports.

and food security drivers

World Trade Organisation

The WTO came into existence in 1995, with many more member countries than its predecessor, the General Agreement on Tariffs and Trade. It offered a freshly negotiated Agreement on Agriculture, which all members had to sign. This agreement entrenched the policy of cutting import tariffs while denying to developing countries many tools that are required for agricultural development. However, it retained avenues for rich countries to subsidise their food sectors.

As has been observed, 'The premise of WTO implies that maximizing agricultural trade should be countries' primary goal - ignoring countries' over-riding need to adequately feed their people.[2] The Agreement on Agriculture lies at the heart of disputes about the WTO and 11 years of failed negotiations since the abortive Seattle conference in 1999. The WTO already looks like a political failure.

Food aid

Poor countries still run short of food and rich countries fill the gap, using the UN's World Food Programme (WFP). Emergency food distribution has gone through various phases, with an increasing emphasis on purchasing food in the country or region where the shortage occurs. This is now accompanied by a search for warnings of future shortages, and social protection of vulnerable people. Under food-for-work programmes, aid recipients sometimes help build roads, irrigation channels and other schemes to improve local agriculture.

None of this amounts to a food policy for the long term, but it has effects on supplies and consumption. Food aid tends to be needed repetitively in the same places, which creates dependence, even to the point of displacing agricultural employment with jobs in aid distribution. The nature of the food supplied can have consequences. Most often it is maize,

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which displaces lower-yielding but more robust local staples in the diets of aid-dependent areas, such as north-eastern Uganda or slums in Addis Ababa.

Food weapons

In the 1970s there was much talk of the 'food weapon' as a means for the US to force poorer nations into line with its policies. The large US exports of grain to the USSR, at great financial cost to that country, played a major part in undermining the Soviet economy and creating the conditions for its collapse. It is not too fanciful to see a 'food aid weapon' in the strong US support for the WFP, which relies on grain supplies from the US. For example, aid programmes in the southern and Darfur areas of the Sudan – a whole sub-continental region in the WFP – help to detach those areas from Khartoum's control. Washington's PL480 programme buys surplus grain from US farmers and passes it on as aid to politically favoured countries.

Millennium Development Goals

The first of the eight MDGs, declared by the UN in 2000, aims to eradicate extreme poverty and hunger by 2015. It wants to halve the proportion of people suffering from hunger, using two indicators of success: the numbers of underweight children and people consuming less than minimum energy requirements. However, the MDG proposes no policies to achieve these goals. It was certainly a novel idea to determine policy just by writing down desired outcomes.

Policies for Africa

Since 2000 there has been a renewed emphasis on food and agricultural needs in Africa. One of the main components of the New Partnership for Africa's Development, under the aegis of the African Union, is a Comprehensive African Agricultural Development Programme, with the stated aim of raising agricultural expenditure above 10% of government budgets. However, few countries have achieved this.

Some donors are promoting a 'Green Revolution for Africa', arguing that technology – including genetically modified seeds – should be relied on for production increases. There is strong political pressure behind this, especially in the US, but also resistance from agricultural and environmental lobbies. A scientific counter case appears in the International Assessment of Agricultural Knowledge, Science and Technology for Development (IAASTD), which was initiated by the FAO and World Bank and endorsed by 61 governments around the world after it was published in 2008.

What else can be done?

It is clear that alternative approaches to food policy are needed. It seems vain to suggest another tightly defined, hands-on global approach, and nor is that desirable: rich countries must at last behave as though other countries' independence means what it says. The 2008 financial crash should, at least, force them to become more humble.

That said, some desirable common elements of policy can be suggested. In particular it is worth considering what was learnt from experience during the 1930s and 1940s, but then forgotten. The agricultural depression of the 1930s, followed by the disruption of trade during the Second World War, led to an emphasis on national food security, with as little reliance on external supplies as possible. The food price crisis of 2007-08 has created a new understanding of the need for food to come from national or regional sources.

It is clear that alternative approaches to food policy are needed

Another emerging principle is to give priority to local seeds and traditional knowledge. In many countries this means indigenous crops rather than wheat, rice and maize, since the former suit local conditions naturally. There is a strong case for redirecting seed research to the yields of crops like sorghum, millet, cassava, yams and plantains rather than the major traded crops.

There should also be a willingness to accept tools like import controls, supply management and targeted subsidies, which were used successfully in past decades but became politically unacceptable under the free-market dogma of the last 30 years. Unless and until we see these changes, food security around the world will continue to be vulnerable to the whims of global policy élites, not to mention the threats posed by climate change.

2 The text of the 1943 conference's Final Act is available at www.worldfooddayusa.org/?id=16367 (April 2010).
3 Professor Daryll Ray, Director of Agricultural Policy Analysis Center, University of Tennessee, www.csa-be.org/IMG/pdf_Food_reserve_D_Ray-2.pdf.

Tom Lines is author of Making Poverty: a history

The big question

How should food policy be made?

Sue Davies, Chief policy advisor at Which? working and campaigning on food issues. www.which.co.uk

The food chain faces enormous and competing challenges. Everyone needs to have access to enough healthy food that is produced in a way that reduces its environmental impact, while respecting broader social and ethical issues.
Achieving this is complex; the evidence is often unclear and many trade-offs are necessary. Delivery requires effective engagement across government and between the diverse sectors of the food chain, as well as a higher profile public debate.
The UK government's Food 2030 laid the foundations, with widespread agreement that the priorities are right. But much of the detail has to be addressed, from tackling inequalities of access to defining the healthy, low impact diet producers and consumers should follow. There are no easy answers and many dilemmas will need to be openly debated.
UK food policy structures were established in response to the breakdown in trust in the food chain a decade ago. They aim to promote independent, evidence-based and open decision-making, with the Food Standards Agency responsible for putting consumers first. Today's priorities do not require a major reallocation of resources or underlying principles, but it is necessary to ensure government departments work better together, as well as with key stakeholders, to tackle cross-functional issues and take advantage of the many synergies.
UK-wide links need to be strengthened, with sharing of experiences and co-ordination between countries as well as at regional level. But it's also crucial that the UK works with EU and international institutions to ensure a joined up and more ambitious approach to tackling health, environmental, agricultural, social, trade and security issues globally.

Jeanette Longfield is co-ordinator of Sustain: the alliance for better food and farming

I wish I had a pound for every time I clocked the phrase "evidence-based policy making". I would be very rich. And I would give the money to campaigns that show – by being successful – that improving food policy needs much, much more than evidence. If I had any money left over, I would promote Professor Tim Lang's analysis that what we usually have is "policy-based evidence making".

Here are just two of many examples of the fragile link between evidence and policy. The Food Standards Agency is knee deep in evidence that traffic light colours on labels are both popular and helpful to people when choosing healthier food products. Despite this evidence, the FSA's policy is now that traffic lights are optional. Many of us suspect that this is because of political pressure from a few major multinational companies that are implacably opposed to traffic light labelling.

Conversely, there is scant evidence that a voluntary approach to improving food in hospitals, schools and other public sector institutions has any effect. This lack of evidence hasn't stopped government from wasting around £54 million on failed voluntary initiatives to try to improve hospital food over the last 10 years.[1] An ideological prejudice against regulation has trumped the evidence.

I'm not arguing that evidence is irrelevant. Sustain's Children's Food Campaign has benefited hugely from the systematic review of evidence showing, beyond reasonable doubt, that junk food advertising encourages children to eat more junk food. But it took a great deal more than that to win the battle to protect children from junk food ads shown on kids' TV.

[1] See Sustain's report, "Yet more hospital food failure", released in March this year http://www.sustainweb.org/news/mar31_legal_standards_for_hospital_food/

The big question

Jack Thurston, a former adviser to the UK Minister for Agriculture, has led the campaign for transparency in the CAP and blogs on European agriculture policy at www.capreform.eu.

Agriculture policy is only one aspect of food policy, but it is an important one. Ever since joining the European Community, British shoppers have had access to food from European farms and British farm policy has been decided in connection with a growing – and increasingly diverse – group of countries.

The 27 EU nations now include some of the world's most intensive and commercial farms, many near-subsistence farms, and a lot in between. In some parts of rural Europe, the threat is suburban encroachment. In others, it is land abandonment and population exodus. A one-size Common Agricultural Policy (CAP) cannot fit all. We must find a way to retain the common rules needed in a common market, whilst allowing countries the flexibility to meet their own needs and ensuring that shared natural resources are protected through concerted action.

The bad old days of butter mountains, wine lakes and dumping surpluses on developing countries are gone. More than ever, European farmers produce to consumer demand, not the diktats of government. Yet the budget, some €60 billion in 2010, is spent according to the political deals of the past, and not the public interest of now and the future. And the pressures from farming on water, soil, wildlife habitats and landscape are relentless.

This year sees the beginning of the debate on the future of the CAP. For far too long the policy has been captured by powerful farming lobbies at the expense everything else, including food policy. Fixing the CAP won't fix food policy, but it will help.

Geoff Tansey is a writer and consultant, FEC member and helped found the journal Food Policy in the mid 1970s.

Food policy concerns more than food and farming. It covers what influences the set of relationships and activities that interact to determine what, how much, by what method, and for whom, food is produced, distributed and consumed. These influences range from exchange rates and terms of trade, to skills and attitudes to food in the household. Food policy must balance the different interests striving for power and control in the food system – interests that tend to seek to offload the risks they face and maximise the benefits they get without reference to the needs of the whole.

The goals of food policy and the food system are complex and interconnected. We need, as the Sustainable Development Commission argues, genuinely sustainable food systems which:

- feed everyone sustainably, equitably and healthily;
- address needs for availability, affordability and accessibility;
- are diverse, ecologically-sound and resilient; and,
- build the capabilities and skills necessary for future generations.

So how do you make policies to deliver this? Seriously, deliberatively, interactively, across disciplinary and departmental boundaries, and by standing up to different vested interests, connecting the local and community level through national to global level. The policies must redistribute power and reframe the rules, incentives and systems to ensure everyone's right to food and require changes in what we eat in the rich world and how it is produced – away from an industrial, fossil fuel-based model towards agro-ecological, diverse and resilient approaches involving knowledge and material sharing, not privatised, patent-based approaches.

Colin Tudge writes books about biology and agriculture and recently helped to found the Campaign for Real Farming

In 2009 my wife Ruth and I founded The Campaign for Real Farming, (subtitled a people's takeover of the world's food supply).

Nothing less is needed. People are starving and the world is falling apart not because it is impossible to feed people but because farming is not designed to do so.

Instead, under the neoliberal, 'free' (but rigged) global market, farmers everywhere are obliged simply to make as much money as possible. If farming was designed to feed people without wrecking the rest of the world – what I call 'Enlightened Agriculture', or 'Real Farming' – then we could do this fairly easily; and with good farming and good eating other good things become possible too: full employment, justice, peace, and co-existence with fellow species.

But we cannot install 'Real Farming' because present-day governments of whatever ostensible hue are locked in to neoliberalism, and dependent on the corporates who are its main drivers and beneficiaries. So if we, people who give a damn, the so-called Ordinary Joes, want farming that can feed our children and grandchildren, we have to do the job ourselves.

This is possible. There is no shortage of willing hands and good ideas out there. It's just a question of bringing them together to form the critical mass. We have a blog (http://campaignforrealfarming.blogspot.com) which will soon be a proper website and become a virtual 'College of Real Farming'; and we hope to create a fund to buy land for real farming, as the RSPB has done for birds. Please log in and get involved!

How should food policy be made?

Former Romanian Farm Minister Dacian Ciolos is the European Commissioner for Agriculture & Rural Development. One of his main tasks in the next 5 years will be to design the EU farm policy for the period after 2013.

Before we prepare our blueprint on the future CAP, I am very keen to generate a public debate about European agriculture policy – not just amongst farmers and the food industry, but amongst the broader public. As consumers and citizens, we are all stakeholders.

One aim is to raise public awareness about that which European agriculture policy already provides – not only in terms of safe and healthy food, but also its contribution to the environment and the economic and social fabric of rural areas. More importantly, we want to stimulate a debate about what agriculture policy can do for us in future – for example, in terms of helping the broader economy emerge from recession.

Similarly, the future CAP will play a fundamental role in tackling some of the most difficult challenges that the planet faces in terms of food security, preserving our natural resources, and redressing biodiversity loss. Climate change is another issue where agriculture will have an important role to play in reducing greenhouse gas emissions (whilst farmers in many areas are already facing challenges caused by climate change, such as unpredictable weather conditions). Policy can help reinforce sustainable and smart growth by embracing new technological developments – enabling us to produce more with less, and helping farmers stay competitive.

The CAP has come a long way over the past 20 years, but further reform is clearly needed. Before we come up with our blueprint for the future, I want to ask you what society expects from agriculture, the role that policy should have in addressing these challenges, and what sort of policy tools should be available. For more details of this public debate, and the chance to express your views, visit our website at: www.europa.eu/agriculture/cap-debate

Hilary Benn MP was Secretary of State for Environment, Food & Rural Affairs between 2007 and 2010.

The last time the Government had a strategic approach to food was during the Second World War. It took the events of 2008 to remind us all what can happen when food security and supply are at risk. We learned that leaving things to the market won't do.

So this January, we published the first comprehensive food strategy for sixty years – Food 2030. Welcomed by farmers, the food industry and consumer groups alike, it sets out the Government's priorities for the industry: profitable, sustainable and healthy food production.

Putting food on our plates is clearly the first priority. But farming and food manufacture is also our biggest manufacturing sector providing 3.6m jobs. So we've been working with everyone to increase and update the skills of the farmers of today and of tomorrow.

We know we can't be self-sufficient in food and that our trade links are important for both our economy and those of the developing world. But we can produce more food at home, using fewer natural resources like water and fertiliser. That's why we are doubling investment in agricultural research.

We also believe that increased food production doesn't have to be at the expense of our environment. A sector can only thrive if it's sustainable, so we must protect the health of the land we farm. Over 70% of our farmland is now under an agri-environmental scheme. From better labelling for consumers on the supermarket shelf to promoting animal health and welfare on farms, we believe in strengthening every link in the supply chain.

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Apart from eating it, most of us are totally disconnected from food, where it comes from and the system that produces it. Over time, we have completely lost sight of the true value of food. Simply exercising choice - if we have one - doesn't challenge who controls our food, where it comes from, how it's grown, what goes in it, how its packaged, how much it costs, who can buy it and where it is sold.

As a region with some of the worst health statistics in the country, food and diet is a huge concern for people in the North West. Our Life believes that the food system is bad for people's wellbeing and health and that we need radical action to put it right.

Our 'Talking Food: Taking Action' project will fundamentally challenge the undemocratic nature of food policy-making in the North West. We'll give people a real say about the kind of food system they want to see.

Seven Food Inquiries across the region will bring together citizens to share knowledge and experience and to consider the opinions of outside 'experts'. The real experts, however, will be the participants, who through discussion, debate and deliberation, will produce a shared vision which will allow the people of the North West easier access to healthy food, produced fairly and sustainably.

We have faith that, given space and support, citizens are very able to navigate their way through the complexities of the food policy landscape and create the kind of food system that suits their needs. Our Life will then mobilise people's desire for change and support them in taking campaign actions that can transform the food policy landscape in the North West.

Food Policy Councils
A model for the future?

Food Policy Councils are being set up across the US. **ALETHEA HARPER** assesses their effectiveness in influencing food policy locally, regionally and nationally.

For decades, the failings of our food system have been seen as isolated problems, to be dealt with by a fragmented array of government and non-governmental agencies at the state and local level. Until Food Policy Councils (FPCs), these failings were largely treated separately.

Food banks, soup kitchens, and anti-hunger groups have been filling in the holes where stagnant wages and shrinking government support left hungry people to fall through the cracks. Health advocates have been tackling diet-related diseases through healthy eating campaigns. Parents and nutrition advocates have been working to reform school lunch programmes, and farm groups have been looking for solutions to the ever-shrinking profit margins for local, family farms. Food justice groups have been advocating for better access to healthy food in low-income neighborhoods. Organic farming advocates have been trying to clean up chemical-intensive agriculture, while the Slow Food movement has sought to restore food traditions and pleasure in eating. Other groups are attempting to eradicate poverty and create local jobs, fighting for better working conditions for immigrants and food workers, focusing on living wage laws and union struggles.

Addressing the food system

Food First and the Community Food Security Coalition conducted a study of Food Policy Councils in 2009, which included testimony from 48 individual interviews with the people most involved in them across North America. We found that FPCs began as a way to address the food system as a whole, often bringing the weight of local, county or state government behind these sorts of grassroots initiatives. Since the first FPC started in 1982 in Knoxville, Tennessee, FPCs have proposed working across sectors, engaging with government policy and programs, grassroots projects, local business and food workers. Instead of many advocates working on the isolated symptoms of a failing food system, FPCs attempt to establish a platform for coordinated action at the local level. In fact, many of the councils we spoke with were created at the behest of community organizations that identified policy barriers to their work, and pushed for a FPC to create a context to better facilitate their activities.

Here in Oakland, California, the seeds of the Oakland Food Policy Council (OFPC) were sown in 2005 when the Oakland Mayor's Office of Sustainability commissioned a study on the Oakland food system. The report recommended creating an FPC to review the food system from production through waste management, and develop ideas to make the food system equitable and sustainable. Oakland City Council allocated start-up funding for the OFPC, and a dedicated group of Oakland citizens, organizations, and City staff worked to identify a home for it. Food First was selected to incubate the council, and we set about learning as much as we could about the FPC model.

How are Food Policy Councils designed?

An FPC consists of a group of representatives and stakeholders from many sectors of the food system. Ideally, the councils include participants representing all five sectors of the food system (production, consumption, processing, distribution and waste recycling). They often include anti-hunger and food justice advocates, educators, non-profit organizations, concerned citizens, government officials, farmers, grocers, chefs, workers, food processors and food distributors. FPCs create an opportunity for discussion and strategy development among these various interests, and create an arena for studying the food system as a whole. Because they are often initiated by government actors, through executive orders, public acts or joint resolutions, FPCs tend to enjoy a formal relationship with local, city or state officials.

Here in Oakland, we made recruiting a diverse council a top priority. In its first year, the OFPC has established itself as one of the most balanced FPCs in the country, with representatives from the business, labour, governance, health, and education communities; citizens; representatives of every food system sector; and different ages, genders, and ethnicities. Our members include groups that have traditionally been underrepresented on food policy councils and in the 'food movement', such as labour representatives and food manufacturing and processing entrepreneurs.

A policy role

The central aim of FPCs is to identify and propose innovative solutions to improve local or state food systems, spurring local economic development and making food systems more environmentally sustainable and socially just. To this end, FPCs often engage in food system research and make policy recommendations, and can even be charged with writing food policy.

Because no US cities or states have agencies devoted explicitly to food (and since there is no federal 'Department

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Citizens and neighbourhoods have begun to directly influence the policies of their local food systems

of Food'), FPCs can improve coordination between agencies whose policies influence the food system.
FPCs can also give voice to the concerns of various stakeholders and serve as a public forum for the discussion of key food system issues. In this capacity, they help to ensure that food policy is democratic and reflects the diverse needs and perspectives of the food system's various constituents.[1]
They can also help to build relationships between government, non-profit and private sector organizations.
Additionally, FPCs often play an active role in educating policy makers and the public about the food system. Lastly, councils often improve coordination between existing government and non-governmental programmes, and suggest, or sometimes even start new programmes.[2]

Affecting policy, making change

Through our study we found that citizens and neighbourhoods have begun to directly influence the policies of their local food systems, creating a context in which equitable and sustainable alternatives for ensuring good, healthy food, are allowed to flourish. Food Policy Councils, at least anecdotally, are changing the rules to encourage these alternatives to take hold.
The FPC model is in many ways still in its infancy, but has five key potentials. FPCs could address public health through improving food access, addressing hunger and food insecurity, and improving the quality of available food. They could affect national and state level policy debates; connect multiple sectors that wouldn't otherwise work together; bring local food policy into mainstream politics; and boost local economies and combat poverty
All of these key potentials lead to one central idea – that FPCs have the potential to democratise the food system. FPCs can amplify the voices of underserved communities that have traditionally had limited access to power. The Detroit Food Policy Council for example, made addressing the underlying racial and economic disparities in food access, retail ownership, food sector jobs and control over food-producing resources a cornerstone of their policy platform.
The power and influence of Food Policy Councils at the local, county, and state levels continues to grow. It is uncharted territory, but the future may well see FPCs coming together to form a national coalition with the capacity to take on larger national and structural issues.

Adapted from Food Policy Councils: Lessons Learned by Alethea Harper, Annie Shattuck, Eric Holt-Giménez, Alison Alkon and Frances Lambrick. (2009, Food First) www.oaklandfood.org/home/food_policy_councils_lessons_learned

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The Zero Hunger strategy

Using human rights to fight hunger and malnutrition

Brazil's bold attempt to tackle hunger targets the structural issues that lie at its root, write **FLAVIO VALENTE** and **ROSEANA DO SOCORRO GONCALVES VIANA.**

Brazil's Zero Hunger strategy must be understood in the context of a long term political process in the struggle against hunger. Portuguese colonization, based on extensive monoculture and African slave labour, led to an extremely inequitable social structure.

When slavery was abolished in 1888, 75% of the population comprised afro-descendant slaves, who had no job, income, land or access to any public services or policies. The development model adopted throughout most of the 20th century was based on the assumption that poverty and hunger would eventually be resolved by the trickle-down effect of economic development. This never happened. An official report prepared for the visit of the UN Rapporteur on the Right to Food in 2002 said the level of inequality had been stable for the last four decades, despite high GNP growth rates.

The social movements and mass mobilizations which led to the Political Amnesty in 1979, including the re-democratization of the country in 1984, the enacting of the so-called 'Citizen Constitution' in 1988 and the impeachment of the first freely-elected President on corruption charges in 1992, aimed to tackle the structural causes of hunger and poverty. In 2002, Luiz Inácio Lula da Silva received a mandate from the people to take that challenge forward.

In his first speech after the election, Lula reaffirmed his commitment to the goal of guaranteeing the right of all Brazilians to eat three meals a day. One of his first acts was to institute the National Food and Nutritional Security Council (CONSEA), in charge of guiding the National Food and Nutritional Security Policy towards achieving the Human Right to Adequate Food. The Zero Hunger strategy is a central component of the National Food and Nutritional Security Policy.

The Council was directly linked to the President´s cabinet, comprising one-third relevant federal ministries and two-thirds civil society representatives, including those most affected by hunger. The Council was headed by one of the civil society counsellors, and secretaried by the Minister to Combat Hunger.

An early task carried out by Lula's government, was to update the mapping of hunger and malnutrition, and identify the social groups that were most food insecure and vulnerable to hunger. The data clearly showed that food insecurity was most prevalent in afro-descendant people, indigenous peoples and rural populations, especially among the landless. More than 40 Zero Hunger strategy programmes were coordinated to reach these people. Today, more than one-third of the Brazilian population benefits from these programmes.

Amongst the most important of the 'safety net' components is the family cash transfer (which reaches 57 million people), and the national school feeding programme (42 million students). Just as relevant are structural components of the strategy, which aim to increase the capacity of the poorest to feed themselves. These include the significant increase in public credit to small scale farmers (PRONAF); the Direct Food Acquisition Programme (PAA) which promotes the purchase of agricultural products for social programmes directly from small scale family farmers, particularly those benefitted by the Agrarian Reform Programme; and programmes which promote professional requalification and microcredit.

The impact of the Zero Hunger strategy, in conjunction with sound national policies towards sustainable economic growth, real monetary increase in the minimum wage levels and agrarian reform is clear. Official statistics show a steady decline of the Gini index of equality from 2002 to 2008 (0.594 to 0.544), after four decades of average 0.593. The percentage of the population in 'extreme poverty' went down from 17% (2003) to 8.8% (2008). Malnutrition rates, measured by height for age deficit, went from 13.5% to 6.8% in the last decade.

Impressive too, is how the process has been institutionalized, guaranteeing that the struggle against hunger is a State commitment and not dependent on the political will of different governments. In 2009, a constitutional amendment was approved, which included the Human Right to Adequate Food. This allows for effective allocation of budgetary funds to Food and Nutritional Security-related plans. A federal food and nutritional security law was approved in 2006, establishing the National Food and Nutritional Security System, with its permanent governing instruments (Food and Nutritional Security Inter-ministerial Chamber) and institutionalized the CONSEA.

There are many challenges on the horizon. Despite all the advances, there is much to be done to overcome the enormous gap still present between the minority of well-to-do Brazilians and the majority of the people. The aggressive expansion of agribusiness in agrifuels, soybeans, and cellulose production (among others) continues the abuse of bonded labour, and has led to the eviction of thousands of indigenous families, traditional populations and small scale farmers, who are unable to find adequate occupations in rural or urban areas.

The new federal government to be elected in October 2010 will have the choice whether to fine-tune the present model towards further reducing the inequities, or submit to the pressures of the hegemonic economic interests in Brazil and their promotion of a traditional development model that brings more profits in the short term. We certainly hope that the first option will emerge victorious.

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From food crisis to food sovereignty

The challenge for social movements

Food sovereignty is the key to tackling global hunger and poverty, argues **ERIC HOLT GIMINEZ**

With the worsening of the global food crisis, general international agreement has emerged regarding the importance of smallholder agriculture in the battle against hunger and poverty. However, public debate has been highly restricted and increasingly dominated by conventional, market-led, and corporate approaches to aid and agricultural development.

These positions call for a return to the World Trade Organization's Doha Round, a new 'Green Revolution,' and the spread of biotechnology to the countries of the Global South. In global and national policy circles, these 'business as usual' approaches are eclipsing many proven, highly effective, farmer-driven agro-ecological and redistributive approaches to agricultural development.

According to the International Assessment on Agricultural Knowledge, Science and Technology for Development (IAASTD), sustainable, smallholder agriculture represents the best option for resolving the four-fold food, finance, fuel and climate crises.

Although conventional wisdom assumes that small family farms are backward and unproductive, agro-ecological research has shown that, given a chance, small farms are much more productive than large farms. Small, ecological farms help cool the planet and provide many important ecosystem services; they are a reservoir for biodiversity, and are less vulnerable to pests, disease, and environmental shock.

There is also strong evidence that small farm communities can be far superior to large, mechanised operations for improving rural livelihoods. Literally millions of people are working to advance sustainable agriculture[1]. Contrary to conventional thinking, these practices are highly productive and could easily feed the projected global population of 10 billion[2].

However, smallholders' potential is thwarted because they are systematically disenfranchised of their basic human rights and dispossessed of their wealth and basic resources. If smallholders are to be the social and productive base for ending hunger in the Global South, then the rights of smallholders – especially women – must be ensured.

Ensuring smallholder rights and the equitable distribution of resource entitlements in the countryside not only implies increasing the levels of aid and investment flowing to smallholders, it requires agrarian policies for the redistribution of public investment in agriculture and land reform – policies that ensure that the wealth of agriculture remains primarily in villages and households and is not siphoned off into foreign corporate coffers.

> The rights of smallholders - especially women - must be ensured

Policies, however, are lifeless without a political commitment to social change – the essential condition for ending poverty and hunger. It is unlikely that hunger will ever be tackled without the enthusiasm, creativity and sheer social force of the world's smallholders. Unless smallholders are in the forefront of agrarian policy they will not be sustainable or equitable, and will be ultimately unviable.

Even good policies will not have a chance of significant implementation unless there is a substantial shift in political will within national governments and the world's multilateral institutions. This shift will come about when the political cost of not shifting is greater than the cost of supporting the status quo. This turn of events is made possible through the power of agrarian social movements.

Smallholders working with movements like Campesino a Campesino (Farmer to Farmer) of Latin America, and NGO networks for farmer-led sustainable agriculture like Participatory Land Use Management (PELUM) of Africa, and the Farmer Field Schools of Asia have restored exhausted soils, raised yields, and preserved the environment using highly effective agro-ecological management practices on hundreds of thousands of acres of land.

At the same time, peasant organizations like the Vìa Campesina are struggling to advance agrarian reform and roll back the corporate colonization of agriculture[3]. Because the expansion of industrial agri-foods dispossesses smallholders and recruits them into a massive global labour force, these peasant movements have broadened their work across borders. The globalization of peasant movements is producing new transnational forms of agrarian advocacy that integrate social, environmental and cultural concerns with demands for land reform and structural change[4].

Two distinguishable currents can be identified from these trends. One is made up of peasant organizations and federations focusing primarily on new agrarian advocacy – like the Via Campesina. The other trend is made up of smallholders working with NGOs that focus primarily on developing sustainable agriculture – like Campesino a Campesino.

Though the political and institutional origins of these currents are different, there are clear synergies between them. The global food crisis is bringing peasant advocates and practitioners together under the banner of food sovereignty. Food sovereignty was first defined by the Via Campesina as "People's right to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture systems". This strategy for ending hunger is nothing less than the democratization of the world's food systems by and for the poor. Because, as one peasant leader puts it, "When the poor are better off, we are all better off."[5]

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Democratising the governance of food and agriculture

A West African success story

A Citizens Jury in Mali gave farmers an unprecedented opportunity to shape their country's farming policy, says **MICHEL PIMBERT**.

In January 2006, the local government of Sikassso in Mali hosted the Citizens' Space for Democratic Deliberation on GMOs and the future of farming in Mali. Organised in the second most economically important region of Mali, this ECID (l'Espace Citoyen d'Interpellation Démocratique), or citizens' jury (CJ), was an unprecedented event in West Africa.
The ECID was designed to allow ordinary farmers, men and women, to make policy recommendations after considering expert evidence from different sources. Its main objective was to create a safe space for communication and action for small, medium and large-scale farmers to better understand GMOs, their risks and advantages; confront different viewpoints and cross-examine expert witnesses in favour of and against GMOs and agricultural industrialisation; and formulate recommendations for policies on GMOs and the future of farming in Mali.

Organised by the Regional Assembly of Sikasso, it had methodological support from the International Institute for Environment and Development (IIED) in London and the Réseau Interdisciplinaire Biosecurité in Geneva. A steering committee of representatives of 15 local, national and international institutions and farmer organisations designed, organised and facilitated the process.

The CJ focused on farmers/producers in Sikasso, home to about 1.6 million people. A region-wide selection process supported by local organisations and structures in seven districts identified 45 farmers as jurors. Clear and transparent criteria helped ensure a fair representation of the many farmers in the region (small versus medium-sized farms, women and men).

Once convened, the jurors cross-examined 14 international witnesses representing a broad range of views. These included biotech scientists, agencies such as the FAO and farmers from South Africa and India with first-hand experience of growing GM crops. In January 2006, the 45 farmers voted against introducing genetically-modified crops in Mali. The farmers' verdict included the following statements:

`As the number of small-scale producers in Mali represents 98% of the farming population and as crop genetic modification is only viable for large-scale producers - who represent only 2% of the farming population - this new technology should not be introduced'.

'Considering that the technology of organic cotton cultivation is already used in Mali, and given that it is highly viable in terms of women's participation, availability of a market and minimum guaranteed price, the cultivation of Bt cotton should not be encouraged; instead it should be stopped'.

'Women farmers should instead be given the technical training needed to produce organic sesame and cotton'.

'Farmers should be directly involved in agricultural research. Research on GMOs should never be carried out in the name of Malian farmers because we farmers do not want GMOs'.

'Research programmes must focus on improving and adding value to traditional crop varieties instead of working on transgenic crops'.

'Strategies are needed to promote organic farming which is based on local resources and local produce'.

Overall, l'ECID has succeeded in politicising an issue of global importance and allowed marginalised voices to question the dominant discourse in favour of GM crops and the industrialisation of agriculture. Seven local radio stations ensured that the entire process – cross-examination of experts, deliberations, jurors' verdict and recommendations – was broadcast live throughout the seven districts of Sikasso region. These broadcasts also reached villages in neighbouring Ivory Coast and Burkina Faso – a total of at least 1.7 million listeners.

In terms of impacts, the approval of national legislation needed for the introduction of GM crops in Mali was delayed, and a key parliamentary debate was held in 2006 on GMO's and the future of Malian agriculture – both widely seen as direct results of this jury's recommendations.

However, the powerful nature of some of the global actors involved (USAID, the World Bank, Monsanto and Syngenta) has seen them looking for new ways of avoiding the constraints of national legislation. Examples include supporting high level meetings and encouraging country governments to harmonise biosafety policies and intellectual property right laws for the entire West African region.

Such secretive decision making has prompted more democratic deliberations on what kind of food and agriculture farmers and consumers want in West Africa. In early 2010, two CJs organised with African partners at Nyeleni (Mali) focused on how to transform agricultural research for food sovereignty in West Africa.

Jurors asked for a fundamental re-orientation of public research away from input intensive farming

Jurors asked for a fundamental re-orientation of public research away from input-intensive farming, towards developing new hybrid seeds to support low external input agriculture, improve local seeds and landraces, and regenerate local food systems and markets. They proposed ways of democratizing the governance of agricultural research too. Media coverage was substantial, with issues brought to the attention of policy makers in Mali, Benin, Burkina Faso, and Senegal.

This unique series of events for West Africa demonstrates that CJ's can provide a safe space for farmers to reach an informed, evidence-based view on complicated and often controversial issues, which can then be amplified to policy makers. Democratising the governance of food and agriculture depends on using these safe citizen spaces to build the countervailing power needed to change discourses, policies and practice.

Dr. Michel Pimbert works with the International Institute for Environment and Development where he underakes policy research on food sovereignty, sustainable agriculture, and deliberative democracy.

Australian food policy
Political process and scientific evidence

A shake-up of Australia's food policy is long overdue, explains **MARK LAWRENCE**.

Food policy in Australia has traditionally operated to a productionist paradigm concerned primarily with growing export markets and pursuing the development and marketing of value added food products. It has been highly successful in achieving these objectives.

It is estimated that the Australian food system currently feeds 60 million people (the domestic population is 22 million). Consequently, Australians enjoy a fortunate position of having a relatively high level of food security and the luxury of food choice; though that security and luxury does not extend to all citizens.

The productiveness of the food system has led to a degree of 'food complacency' among the population. Many Australians are disconnected from the food supply and expect that a safe, cheap, abundant and diverse food supply will always be available.

This complacency towards the food system extends to the national government. The first and last national food and nutrition policy was launched in 1992. Critically, there is a lack of data available to encourage the government to update that policy. The most recent national adult nutrition survey was conducted in 1995-96.

This means that arguments for the development of a food policy responsive to current food system challenges must be constructed from data reflecting the food supply and dietary behaviours of 15 years ago. For all the wrong reasons, the government has been true to its rationalist mantra of 'evidence-based practice' to inform policy-making; there has been a lack of evidence and so there has been a lack of policy-making.

But the circumstances, evidence base and political will for food policy activities in Australia are changing. The impetus for policy action is the mounting evidence that the food system is broken.

Environmentally, the food system's productivity is being adversely affected by climate change, diminishing water stocks and flows, peak oil and the regular frequency with which weather records are being broken. In April this year, Melbourne recorded its longest sequence of consecutive days (124) during which the day temperature did not drop below 20 degrees Celsius.

The rising epidemic of obesity and chronic disease is placing increasing pressure on the healthcare system and the ability to service this demand. This phenomenon has been described as 'peak health', which means that we are about to pass through the point where maximum healthcare is available, and the subsequent increasing demands combined with diminishing resources will lead inevitably to tensions in healthcare provision.

> After years of neglect a number of policy activities are now being pursued

The cost of food has risen 41% since 2000 and this is associated with rising inequities in access to food and nutrition outcomes. Economic measures of the food system reveal significant stresses, with many small to medium stakeholders across the food system struggling to stay afloat.

After years of neglect a number of policy activities are now being pursued by governments, public health organisations and civil society, and are generating much interest. For instance, a 2010 review of national food labelling law and policy has attracted over 7,000 submissions. There are promising signs that the country is on the cusp of a big change in food and nutrition policy and that the policy-making process will improve on the traditional ways of making policy. There are three key lessons for improved policy-making based on current food policy activities.

Systematic and comprehensive analysis of policy gaps and opportunities

Typically, the health sector has been the driver and the focus of food policy activities in Australia. Yet the health sector has a relatively minor influence over the structure and operation of the food system. A systematic and comprehensive approach to food policy planning and implementation requires analysts to consider all government departments (horizontal dimension) and all levels of government (vertical dimension) that influence the food system.

Applying a two-dimensional grid analysis has assisted Australian food policy practitioners to identify otherwise overlooked policy gaps, barriers and opportunities. For instance, analysing across government departments has enabled practitioners to identify the perverse incentive in the tax system that recognises food marketing as a business expense and therefore qualifies this activity as a legitimate tax deduction. That means approximately half of a junk food manufacturer's marketing expenditure is subsidised by the Australian taxpayer.

A similar analytical approach has helped identify valuable policy activities that can be pursued at the federal, state and local levels of government. For instance, there is much interest in incorporating key performance indicators related to

food sustainability into revised planning agreements for local governments.

Framing the policy debate

The federal and state governments have flagged their intention to develop and implement food policy to address food and health in general and food advertising of junk food to children in particular. It has been revealing to observe how, in the policy planning process, the Australian Food and Grocery Council (AFGC) has been able to become involved in the relevant decision-making committees and been effective in influencing the framing of the policy problem and the policy solution. Although the AFGC represents approximately just 9% of food companies in Australia, those 9% represent the 'big end of town' – the multinational companies responsible for many highly processed foods that account for approximately 80% of the economic output from the food manufacturing sector.

When the federal government announced its so-called 'food and health' dialogue in late 2009, the dialogue's focus quickly became building partnerships with food manufacturers to promote product reformulation. Whereas reformulation of junk food products to lower their salt, fat and sugar content is a step in the right direction it is debateable whether it is the highest policy priority as it does not reform the business-as-usual approach to the operation of a food system that fosters excessive and unsustainable food consumption. Moreover, there was a lack of scientific evidence to inform the agreed reformulation targets, and several targets were more conservative than current market practice.

The AFGC has successfully demonstrated how an interest group can position itself ahead of a food policy debate and then frame agendas as they arise. For instance, a strategy of self regulation to restrict the amount of junk food advertising to children was agreed by the AFGC and its members as a forward defensive position against the anticipated introduction of regulation by the government.

The AFGC now claims that self regulation has resulted in virtually no junk food advertising appearing during children's television time. However, public health advocates point out that the television advertising restrictions were replaced by a significant shift in the marketing of junk food products to other media and sporting events directed at children. The loopholes and double standards were well illustrated when the Australian cricket captain was televised admonishing a test player for a drinking binge while all the time sitting earnestly in front of the cameras wearing a cap emblazoned with the name and logo of the team's sponsor – a beer company!

The AFGC has signalled that it wants to be "part of the solution not the problem" in the current food and nutrition policy deliberations.

It has launched a pre-emptive strike by proposing to government a national food strategy with the objective of protecting the food economy and export markets in particular. It is now inviting public health organisations and civil society to join as partners in its initiative.

Public health advocacy is receiving increasing attention in Australia

In response to this kind of initiative, and the perceived lack of control over the framing of many food policy debates, public health advocacy is receiving increasing attention in Australia. Coalitions such as the Victorian Food Policy Coalition (VFPC) and the Parent's Jury are now advocating for a number of food policy reforms and setting out to inform and frame policy agendas to protect public health interests. The VFPC is based on Sustain in the UK and Jeanette Longfield has assisted in establishing many of its systems and procedures based on the UK experience.

The nature of policy-relevant evidence

In Australia, substantial investment has been directed towards developing the rules and procedures for evidence based policy practice. The conventional orthodoxy to evidence based practice is founded in evidence based medicine. This orthodoxy works well for methods required to assess evidence in clinical settings such as pharmacological trials, but its relevance for assessing food and health relationships in free-living populations is less clear.

For example, food policy objectives concerned with environmental sustainability and social considerations may struggle to be enlightened by the 'hierarchy of evidence;' approach central to much evidence based practice. Greater flexibility is now being applied to the collection, interpretation and application of policy-relevant evidence. Two examples are the current reviews of the Australian dietary guidelines and the national food selection guide which both include evidence of food and environmental and/or social relationships in their decision-making processes.

However, in the Australian food regulatory system, limits on the nature of evidence considered legitimate to inform policy decisions persist, and this is hindering the protection of public health and safety. For instance, when undertaking a risk analysis of a novel food product such as calcium-fortified fruit juice, evidence obtained from the disciplines of toxicology and microbiology is considered relevant, whilst evidence obtained from nutrition science often struggles to receive attention.

It is an exciting time for food policy development and implementation in Australia. Recent policy experiences indicate that the policy-making process often is being influenced as much by political processes as scientific evidence. Attention towards the three factors discussed in this article will contribute to policy-making processes for policies that will help repair our broken food system.

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Making Scottish food policy
A cross-cutting approach

PETE RITCHIE analyses Scotland's national Food and Drink Strategy, and finds that while there's a will, the way hasn't been plain sailing.

"Yuk" said Goldilocks. "This porage is much too salty. They chose the right ingredients but the recipe was not a success"

Making government policy is a messy business and the result is never to everyone's taste. For me, Recipe for Success, Scotland's National Food and Drink Policy published in June 2009, has too much emphasis on an export-focused growth strategy for the food and drink industry. I wanted to see more about growing more of our own food in Scotland, on sustainable consumption, and on refocusing farm subsidies, all within an international food sovereignty framework. Others wanted to see a tougher line on alcohol, or more specifics on addressing food poverty.

However, the focus of this article is on the policy-making process more than its content. Free and fair elections and well-refereed football matches both produce results which disappoint many people: similarly, a good policy-making process means among other things that disappointed people don't cry foul.

I start by suggesting some criteria for evaluating a public policy-making process in a complex area such as food. A good policy-making process in a democracy should be fair, coherent, authentic, responsive and creative.

In a fair process the views and interests of different stakeholders are given proportionate weight – especially those who are silent or absent. It is easier for government to listen to familiar voices, whether business interests or established NGOs. Conscious effort is needed to balance this by actively engaging other constituencies who share the risks and benefits – including, for example, children and people on low incomes. In the case of food policy, the interests of future generations, food producers in other countries, farm animals and wildlife should also be represented.

In a coherent process, there is a good enough map of the policy domain and how it relates to other trends, influences and processes both inside and outside government. The process is informed by knowledge of policies and results in other countries and grounded in a historical perspective. There is a developing shared understanding of the connections between actions and results – what will happen with business as usual, what sort of government interventions are likely to be effective, the timescales for different sorts of change.

In an authentic process, government is explicit about the values and assumptions driving the process. There is a commitment from government to follow through, with senior people willing to identify with the policy. The process is transparent and open to enquiry.

In a responsive process, government creates and maintains a space for dialogue with and between stakeholders. Serious efforts are made to bring a wide range of people and views into the conversation and government not only listens but tells people what it has heard and how this has influenced the next part of the process.

In a creative process, new insights and approaches are generated. The policy proposals which emerge were not all present at the start. A creative process also yields new alliances and connections which contribute to implementation and further policy development.

The Scottish food and drink policy process

Soon after the SNP came to power in the 2007 election, Parliament resolved that Scotland should have a national food policy, and a discussion paper called 'Choosing the Right Ingredients' was published in January 2008.

Although led by Food and Drink Industry division, the process was explicitly cross-cutting from the start, which meant a new way of working in a division which was previously focused on support to industry.

'Choosing the Right Ingredients' states that "Food is everyone's business" and sets out the government's vision, linked to its five strategic objectives.

The three-month consultation process included over 15 face-to-face stakeholder events, e-newsletters, a food blog, and a series of media events. Cabinet Secretary Richard Lochhead was directly involved in many of these.

This energetic activity stimulated 441 written responses which fell into three main groups: individual citizens (259), non-profit organisations (121) and business organisations (61). Taking all responses together, the top three topics were diet and nutrition (68%), local food and local economies (49%) and health promotion (44%). While the three groups of respondents differed in emphasis, there was a broad consensus, with no polarization of views.

In autumn 2008, the second phase began, with five workstreams set up to tackle different areas, and a leadership forum established. Following industry representation, drink was added to the policy. Workstream themes were: sustainable economic growth of the industry; healthy and sustainable choices; Scotland's reputation as a land of food and drink; getting public procurement right; and food security, access and affordability. The leadership forum brought the chairs of each workstream together with 'champions' for four themes – health, environment, economy, affordability – and a representative of the drinks industry.

Workstream chairs were free to operate in different ways. The

Leadership Forum sought to create a space where the work of different workstreams could be constructively critiqued and the tensions between different policy goals explored.
'Recipe for Success' was published in June 2009, and an extended Leadership Forum reconvened to help government maintain a coherent approach and find ways to measure success.

The quality of the process

The process has become less than fair in the weight given to different interests. Recipe for Success – unlike 'Choosing the Right Ingredients' - leads on "supporting the growth of our food and drink industry" and is clearly focused on production for export. The clear targets and government commitment contrast with the fuzzier proposals on health.
The emphasis in 'Choosing the Right Ingredients' on co-operation and collaboration and on viability of primary producers issues has been replaced by 'business competitiveness and growth'. Concerns about local food, animal welfare and the environment which emerged clearly from the consultation were under-represented in the workstream structure and the final report. While fair trade gets a mention, the wider impact of Scotland's imports of food and animal feed on the global environment are not addressed.
The language of the Workstream 1 report gives a clue to the strength of advocacy from the industry: "The drinks sectors, both alcoholic and soft, are large, consolidated and principally focused on export markets ..The challenge ... is to retain these large corporate organisations and grow the supply base within Scotland to service them.
"The food sector on the other hand, while economically larger, services mostly domestic markets ... and is highly fragmented with many life-style businesses ... In this sector, the challenge is to encourage a step change in growth through industry consolidation and capability development: in short, a scale up strategy."
While 'Recipe for Success' acknowledges the need for some countervailing advocacy from civil society, no progress has yet been made on implementing this proposal.
The process could have been more coherent in mapping the territory, history and policy options, and reading across to other policy domains. The basis for the target figure of £10bn food industry sales by 2017 is not clear, nor is the impact of achieving this target on domestic production, diet, land use and greenhouse gas emissions. The links could have been stronger with the climate change agenda, where Scotland has set world-leading emissions reduction targets, and with the review of farm subsidies post 2012.
While boosting exports supports the case for viable independence, the downside of our economy's over-reliance on large companies exporting a single easily copied product is not explored. The crucial role of local authorities in implementing food policy - from procurement, licensing, and development control to allotments provision - was not reflected in the process.

Finally, gender is notably absent from the process. Space does not allow an exploration of this issue, but food is profoundly gendered and it is hard to develop the cultural change proposed by government without attention to this.
Having said this, the process is a major step forward in creating a coherent food (rather than food industry) policy domain.
The process has been authentic, with senior government figures identifying with the project. There has been a high degree of transparency – for example, the more balanced Leadership Forum report is published alongside Recipe for Success, and the Workstream reports were published by their chairs rather than by government. In the Leadership Forum, as Annie Anderson comments, "we compromised, we argued and we agreed".
However, the shift to a 'food and drink' strategy profoundly altered the direction of travel and was very much decided within government.
The process has been responsive up to a point, with feedback to respondents from the initial consultation. But there has been little feedback to the wider public since 'Recipe for Success' was published. The Leadership Forum has had no minutes published since February 2009.
The process has been creative in stimulating debate and encouraging new initiatives. However, consumers and communities were not invited to be active partners in implementation. Even a headline target on allotments to increase from one per 700 people in Scotland to match the one per 200 people in England would have given a practical focus for citizen action.

The process is a major step forward in creating a coherent food policy domain

Footprints

Reports from a policy-making process are only ever footprints to show where the conversation was at a particular point in time. The defining strength of Scotland's food and drink policy (apart from determined resistance to GM) is the cross-government commitment – easier but by no means easy in a small country. Broadening and deepening engagement with civil society (for example through a parliamentary enquiry, a citizens' panel exploring different scenarios, or strengthening independent advocacy) will help Scotland get to grips with the inescapable tensions in food and drink policy, nowhere better exemplified than in this comment from Workstream I:
"The increase in 'scratch' cooking is having an impact upon types of products sold, decrease in value add, cheaper cuts of meat etc. and all of these things are impacting upon sales versus profit."

"If only Daddy Bear would go out and buy a probiotic breakfast bar in a biodegradable wrapper" said Goldilocks.

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Onwards and upwards

From big ideas to a focus on delivery

Will the dawn of a new era in British politics also herald a new era in UK food policy? **Andrew Jarvis** weighs up the odds.

There was little for food policy wonks to get excited about in any of the major party manifestos for the May 6 election. Some promises of clearer labelling, a few heavily qualified signals of good intent on public procurement, and a nod to a supermarket ombudsman were about the limit of it. Given how much effort has gone into food policy development in Whitehall over the last three years, this might seem a little odd.

How is it that the succession of reports, strategies and frameworks issued over the past three years do not seem to have a visible impact on the parties' thinking, or prompted a more robust sense of ambition and intent?

Perhaps the answer is straightforward. Visions and frameworks have their place but it is crunchy, specific proposals for change that focus the mind. Few have emerged, and so food has remained a personal political issue on which votes are cast at the check-out rather than the ballot box.

The emphasis of the political narrative may shift with the new government but the challenges to our food system recognised in Food 2030 and its precursors – poor dietary health, climate change, food safety, the need to support the sector's economic competitiveness – are not going away. If responding to them is to be part of the new government's mission, as surely it must, it is now time to look to action and implementation. This should include defining how much progress is going to be made on the key issues in the next three years and specific measures to deliver that change, regular reporting on progress and credible oversight.

Within that lies the second key element of the food policy agenda for the next government – engagement with the rest of Europe. Because so many of the policies and regulations that matter to UK food are set at EU level, it cannot be ignored. The UK's ability to realise its own vision for a future food system is going to be severely limited if the rest of the EU is working to a different plan. Yet the discussions held around the key food policy developments of the last three years have mainly been between ourselves, here on our island.

There is now an opportunity for the UK to take a positive message to Brussels and European capitals. It's a message that spells out the case for a more integrated and coherent approach to food, which recognises the interests of consumers and of producers, and the multiple challenges we all face. It puts the Common Agricultural Policy and Common Fisheries Policy in a new context, and could contribute to the EU's ambitions on carbon and on competitiveness.

This is probably not, in the first instance, a matter of attempting to push proposals through endless Brussels committee meetings. Rather, its more likely a matter of finding opportunities to let the ideas do the talking, identifying Member States with similar perspectives and concerns, and building new communities of common interest. Translate Food 2030, Defra's food security framework and the other work being done in Whitehall into other EU languages, and distribute them. Engage NGOs and the food chain in the process of dialogue.

Finally, it is inevitable that the food system will be affected by the current fiscal situation. Changes in taxes on industry and consumers seem unavoidable but how can they be made, as far as possible, to work with rather than against the grain of food policy? And when spending cuts hit food-related programmes, what must be preserved at all costs and what could be left for another day? Can food producers' demand for seasonal labour be squared with tighter immigration controls? How can the pursuit of fairness in our food system be safeguarded when times get tight?

Despite what the manifestos say, those food policy wonks could find the next few years even more interesting than the last.

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Route79 Morrisons

The food economy: global issues and challenges
Frank Bunte and Hans Dagevos (Ed) | 2009 | Wageningen Academic Publishers | ISBN 978-90-8686-109-5
As a new food economy emerges, we see interlinked relationships between scarcity and abundance, industrialised and artisanal farming, and globalisation and the growth of local food economies. This book, aimed at academics, policy makers, students and consumers, makes a coherent attempt at mapping the existing and emerging trends in the expanding food economy. EB

Reconciling food law to competitiveness
Bernd van der Meulen | 2009 | Wageningen Academic Publishers| ISBN 978-90-8686-098-2
The food industry is both the most important manufacturing sector in the EU, and the third most regulated. Self defined as 'the first food competitiveness study,' this book looks at looks at the link between competitiveness and EU food regulation and makes recommendations for better, simplified legislation. AC

Risk perception, culture, and legal change
Matteo Ferrari | 2009 | Ashgate | ISBN 978-0-7546-7811-3
One disease, three responses. Matte Ferrari explores why the US, Japanese and EU approaches to BSE were different. Analysing the risk in the three case studies, he argues that the notion of risk, and the way it's understood and evaluated, reflects and shapes the values, preferences and prejudices of society. A compelling book. EB

EU policy for agriculture, food and rural areas
Oskam A., Meester G., Silvis H. (Eds.) | 2010 | Wageningen Academic Publishers | ISBN 978-90-8686-118-7
A must read for students, academic and policy makers alike, this book provides the low-down on EU policies for agriculture, food and rural affairs. Offering expert views on how those policies work in practice, why they are in place, and trends for future development, it is a timely and practical analysis of a complex beast. EB

Diet for a hot planet
Anna Lappé | 2010 | Bloomsbury USA| ISBN 978-1-59691-659-3
Lappé's timely book exposes the 'dark side' of our food system, highlighting the link between diet and climate change. It reminds us of the power that we have, as eaters, to unfurl this link through "voting with our forks." A highly positive, readable book sure to leave you feeling empowered to reclaim food. AC

The rough guide to green living
Duncan Clark | 2010 | The Rough Guides| ISBN 978-1-84836-107-2
Which shops are kinder to the planet? What's greener, the train or the bus? This book makes a valiant attempt to answer these questions and more, offering the 'green consumer' advice on everything from working out carbon footprints to helping people eat, dress, travel and use energy better. EB

Agriculture, biodiversity and markets
Lockie S., Carpender D. (Eds.) | 2010 | earthscan| ISBN 978-1-84407-776-2
Is the preservation of agricultural biodiversity at odds with agricultural livelihoods? The books' editors scour the globe to find case studies that enhance debate around this complex question. They conclude that while there's no one answer, lessons can be learned from a wide range of experiences, from market intervention to global trade. EB

Out of the mainstream, water rights, politics and identity
Boelens R., Getches D., Guevara-Gil A. (Eds.) | 2010 | earthscan| ISBN 978-1-5969184407-676-5
The source of life, water is also at the heart of struggles over equality, power and identity. Using case studies from the Andean countries of South America, this powerful book explores how, against the odds, people fight to retain their water rights against multinational corporations, governments and geo-economic systems. EB

Justice: what's the right thing to do?
Michael Sandal | 2010 | Penguin | ISBN 978-0-141-04133-9
In western societies, where inequalities are widening, we've become shy of asking "what's the right thing to do". In this fascinating and accessible book Michael Sandel argues that by tackling difficult moral questions – from abortion to euthanasia and more – we can begin to make a more just society. EB

Forthcoming events

10-11 Jun '10	Sustainable Foods Summit | Organic Monitor | http://wwwsustainablefoodssummit.com | Amsterdam, Netherlands
16th Jun '10	The Grocer Gold Awards | The Grocer | www.thegrocergoldawards.co.uk London, UK
22-24 Jun '10	Health Claims and Food Labelling: EU Food Law's 19th Annual European Food Law Conference http://www.agra-net.com | Brussels, Belgium
5th - 7th Jul '10	Sustainable Tourism 2010- Fourth International Conference on Sustainable Tourism | Wessex Institute of Technology | http://www.wessex.ac.uk/10-conferences/sustainable-tourism-2010.html | New Forest, UK
5th - 6th Jul '10	2nd BSA Food Study Group International Conference | British Sociological Association (BSA) | www.food-study-group.org.uk | London, UK
10th Jul '10	Newport Agricultural Show | Newport and District Agricultural Society http://newportshow.org | Chetwynd Deer Park, Newport
5th-6th Jul '10	ICFEB 2010: International Conference on Food Engineering and Biotechnology | World Academy of Science Engineering and Technology http://www.waset.org/conferences/2010/bali/icfeb/index.php | Bali, Indonesia
19th - 22nd Jul '10	Royal Welsh Show | Royal Welsh Agricultural Society | http://www.rwas.co.uk/en/welsh-show | Powys, Wales
28th Jun '10	Tasting the Future: Collaborative innovation for One Planet Food (invitation only) | ADAS, The Food Ethics Council, The Food and Drink Federation and WWF-UK (invitation only) | To find out more go to https://www.fdf.org.uk/events/TastingTheFutureInvitation.pdf | London, UK
28th Jun - 1st Jul '10	Innovation & Sustainable Development in Agriculture and Food CIRAD, INRA and ORSTOM | www.isda2010.net | Montpellier, France
1st - 6th Aug '10	9th World Congress on Genetics Applied to Livestock Production | WCGALP http://www.wcgalp2010.org/Leipzig, Germany
11th - 13th Aug '10	ICAFAS 2010: International Conference on Agricultural, Food and Animal Sciences | World Academy of Science, Engineering and Technology | http://www.waset.org/conferences/2010/stockholm/icafas | Stockholm, Sweden
13th - 15th Aug '10	Foodies at Edinburgh Festival | Foodies Festivals | http://www.foodiesfestival.com/edinburgh | Edinburgh, UK
1st - 30th Sep '10	Brighton & Hove Food and Drink Festival | Brighton & Hove Food and Drink Festival | http://www.brightonspringharvest.com/home.html | Brighton & Hove, UK
3rd - 17th Sep' 10	Soil Association Organic Fortnight | Soil Association | www.soilassociation.org/organicfortnight | Nationwide, UK
4th - 19th Sep '10	Scottish Food & Drink Fortnight | Scotland Food & Drink | http://www.scottishfoodanddrinkfortnight.co.uk/page/Home.aspx | Across Scotland, UK
7th - 8th Sep '10	Dairy Event & Livestock Show | Royal Association of British Dairy Farmers | http://www.dairyevent.co.uk | NEC Birmingham, UK
11th- 12th Sep '10	Harvest at Jimmy's | Big Wheel Promotions | http://www.harvestatjimmys.com/ Suffolk, UK
11th - 12th Sep '10	Organic Food Festival | Real Food Festivals ltd | http://www.theorganicfoodfestival.co.uk Bristol, UK
13th - 24th Sep '10	Rights Based Approach to Food and Nutrition Security Course Wageningen UR Centre for Development Innovation | http://www.cdi.wur.nl | Wageningen, Netherlands
14th - 18th Sep '10	14th International Biotechnology Symposium and Exhibition: Biotechnology for the Sustainability of Human Society | University of Bologna | http://www.ibs2010.org/index.asp | Rimini, Italy
7th - 9th Sep '10	BES Annual Meeting 2010 | British Ecological Society | http://www.itishecologicalsociety.org/meetings/current_future_meetings/2010_annual_meeting/index.php | University of Leeds,UK
16th-18th Sep '10	Congress of the European Society for Agricultural and Food Ethics- Global Food Security: Ethical and Legal Challenges | Eursafe | www.eursafe2010.es | University of Deusto, Bilbao,Spain
18th Sep - 3rd Oct '10	British Food Fortnight | Love British Food | http://lovebritishfood.co.uk/blogcategory/british-food-fortnight-2010/ | Nationwide, UK