From 2025 we are FOODRISE
This document uses our old branding

National Food Strategy - call for evidence

October 2019

Feedback is an environmental charity which regenerates nature by transforming our food system. To move towards a food system that nourishes both people and our planet will require significant changes to our food culture, the food economy and its governance. We are seeking to bring about these changes through a unique combination of campaigning and advocacy, citizen engagement and pilot programmes. For more information visit our website: www.feedbackglobal.org

Our recommendations to the National Food Strategy team to help build a more circular, resilient and sustainable food system (see https://feedbackglobal.org/about-us/our-model/) include:

1. **Redefine productivity for best nutrition, health and environmental outcomes**

1.1 Agricultural policy cannot effectively deliver best case outcomes for planetary and human health while prioritising profit and volume. We support the Government's public money for public goods approach to agricultural subsidy, and recommend that in order to make best use of this approach, the government adopts a definition of agricultural productivity based on the following formula:

Greatest nutritional value consumed per hectare, for least environmental impact** or greatest environmental enhancement****

* Nutritional value consumed is defined as both the production and consumption of foods which are directly beneficial to human health and wellbeing, rather than by calories. Horticultural production, and the production of leguminous crops, would score better on this scale than sugar beet production or non-food crops such as oilseed rape, or bio-energy crops. Note that we include consumption in this metric, as production alone clearly does not deliver nutrition if products are wasted.

** Least environmental impact can be assessed in terms of impact on soil health, water use and local water pollution, as well as carbon emissions.

*** Agriculture may be regarded as environmentally enhancing when it enhances specific elements such as soil quality or local biodiversity, or contributes to net zero climate goals through carbon sequestration.

By applying these broad principles to agricultural subsidy and planning, the government will be able to make policy decisions which prioritise:

- Reducing waste – WRAP has found that we waste around 3.6 million tonnes of food at farm level (WRAP 2019), a colossal waste of the valuable resources that went into food production. Wasting food at farm-level undermines the nutritional output of that farm and therefore it's productivity.
- Enhancing soil health – growing crops which produce low or no nutritional value, while depleting soil fertility will be disincentivised under this definition of productivity. Similarly, farming methods which protect and restore healthy soils will be supported.

- Producing healthy food – in order to increase the UK's production of healthy food, primarily fruits and vegetables, public policy will need to actively prioritise these types of production.

1.2 In order to implement this approach, we recommend that the government adopts a Land Use Strategy for England. This strategy should consider optimal use of land and soils in order to fulfil our definition of productivity, disincentivise waste and overproduction and shrink the overall size of the agricultural system in order to leave space for nature and afforestation. Broadly this means more agricultural land devoted to horticultural production in areas with higher likelihood of 'best and most versatile agricultural land' (Natural England 2017), reducing the area of land given over to animal agriculture, including the production of animal feed, and reducing the area of land used to produce crops which do not contribute to human nutrition (Feedback, 2019 [forthcoming]).

1.3 We recommend an immediate review of industrial and agricultural policy related to the production of non-food crops, in particular sugar beet and feedstock crops intended for bioenergy (anaerobic digestion AD). We also recommend that the role of AD as a preferred organic waste management technology is reviewed against a future scenario of optimised renewable energy production and land use, to understand its true niche role in a net zero carbon economy, and adapt incentives for the AD sector accordingly.

The UK produces 7.6 million tonnes of sugar beet a year, which is processed into 1.4 million tonnes of refined sugar, around 70% of which is consumed in the UK (Defra 2019). Sugar beet production contributes to soil loss and degradation – between 2014 and 2018 Defra estimates average soil loss per year during the beet harvest as 489,000 tonnes (Defra 2018b). As sugar beet is largely grown in areas with high likelihood of 'best and most versatile agricultural land' (i.e. East Anglia, Norfolk), the practice of devoting large areas to sugar beet production is substantially undermining our long-term soil fertility: all in order to produce a product which we need to eat much less of. We recommend that the National Food Strategy consider options to decrease the total agricultural production of sugar beet, including proposing a new quota on UK production, to replace the EU quota which was lifted in 2017 (European Commission 2017). Agriculture and land use policies must support, rather than undermine public health goals. (Feedback, 2019 forthcoming).

2. Leverage the power of changing demand from UK diets

2.1 Feedback responded to this summer's publication of the IPCC Special Report on Land and Climate (IPCC 2019) with a call for the UK Government to take a more ambitions and forward-thinking attitude to dietary policy in order to deliver on climate and environmental goals (Feedback 2019). The transformation of the food system requires a suite of coordinated policy approaches, from a variety of institutions, incorporating both supply-side and demand-side interventions (Schercher & Verburg, 2017; Willets et al 2019). To maximise their potential, there needs to be coordination across government, finding synergy with health, land-use, climate, rural livelihoods and economic development. Recent research from CAST finding a small majority in favour of reducing meat consumption (53% versus 37% not in favour) implies a measurable, fast change in public mood and attitudes (Capstick et al 2019).

2.2 We recommend that the UK government adopts a **cross-departmental target to reduce meat and dairy consumption by 50% by 2030**. This is line with the approach of the Eating Better Alliance.

Policy ideas which could support this target include:

2.2.1 Stronger regulation on food advertising standards, in particular for the advertising of products which have been shown to have negative impacts on human health such as processed meat products.

2.2.2 Public procurement standards which require the majority of meals served in public institutions to be meat-free or meat and dairy-free.

2.3 We also recommend that the UK government adopts a **cross-departmental target to halve food waste by 2030**. Despite often leading international efforts to reduce food waste, the UK continues to produce over 10 million tonnes of food waste a year (WRAP 2018). Sustainable Development Goal 12.3, which the UK government endorsed as far back as 2015, sets a global target for 50% reduction of food waste by 2030 (UN 2016). Champions 12.3 recommend that this 50% reduction should be from farm to fork, including food left unharvested in the field (Hanson, 2017). Regulatory rather than voluntary approaches could speed the uptake of this target.

Policy ideas which could support this target include:

2.3.1 Build on the EU Horizon 2020 REFRESH research outcomes (Luyckx, 2019) to set up specialist trial processing facilities to turn surplus food no longer fit for human consumption into safe pig feed. Regulating for the safe use of surplus food in feed could deliver at least half a million tonnes of CO2 savings each year.

2.3.2 Making food waste reporting for businesses over a certain size across the whole supply chain mandatory by 2020. Transparency is a basic step towards tackling waste, which Feedback has called for since 2009. The government proposed a consultation on this measure in the 2018 Waste and Resources Strategy (Defra 2018a). Given that many of the businesses who signed up to WRAP's 'Target, Measure, Act' roadmap in 2017 have this year failed to publish their food waste data as promised, it is clearly time for regulation to step in.

3. Re-focus on regional, community-driven food systems – and away from industrialised, corporate-controlled food production

In the past 40 years, the food system has seen extraordinary consolidation in the hands of corporations, which is now complete and normalised. These food corporations are legally constituted to generate financial value for shareholders, driving business strategies, models and activities that counteract sustainability and resilience (Millstone 2017). Examples include the supermarket business model, the overproduction of sugar or the rapid expansion of Scottish aquaculture to the detriment of Scottish landscapes.

Corporate control has delivered cheap-at-purchase food to UK citizens. But this has come at a huge cost: the Sustainable Food Trust's updated figures for 2019 found that for every £1 spent on food by UK customers, an additional 97 pence of health, environmental and climate impacts are generated (Sustainable Food Trust 2019).

The UK has many examples of local food projects which are working sustainably and cooperatively to feed the community with healthy, affordable food, and there is a role for both local, regional and national policy to support and nurture these models.

Policy ideas which could support this goal include:

3.1 Actively supporting community-supported agricultural models, using seed funding, business development support and capital loans. Baker et al. (2019) found that, when waste was measured at all stages of the system, a Community-Supported Agriculture (CSA) group wasted only 6.71% of produce by weight compared to 40.7-47.7% by the supermarket system. In addition, a 2011 report by the Soil Association found that community-supported agriculture demonstrated high levels of local employment relative to land available equivalent to 0.14 employees/hectare compared with a mean of 0.027 employees/hectare across UK agricultural as a whole (Soil Association 2011).

3.3 Adopt a UK equivalent to the regulations under the 2018 French 'Egalim' Law, which requires that public canteens use at least 50% organic, local or sustainably produced ingredients by January 2020 (Ministere de l'Agriculture et de l'Alimentation 2019). In Avignon this law is being leverage to support local businesses including an intermediary platform[1] connecting public catering services and farmers, a SME[2] which prepares local fresh vegetables and provides them to canteens ready to cook, and an SME[3] which prepares soups and purees using local produce, allowing a response to over-supply of specific products during different seasons.

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