

National Food Strategy Update

Report by Alice Biggins

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1. Summary

- 1.1 Henry Dimbleby was asked by Michael Gove in his former capacity as Secretary of State for Defra to undertake an independent review of the food system, and produce recommendations for government in an (England-only) National Food Strategy. The government will respond with a White Paper outlining how it will take forward those recommendations.
- 1.2 The Food Standards Agency has significant interest in the exercise, and has been contributing evidence and expertise to the review team. Henry Dimbleby is attending the FSA Board meeting on 21 January to talk about the National Food Strategy, so the FSA Board has an opportunity to ask questions and contribute views.
- 1.3 Recommendation: that the Board
 - Consider the proposed messages to the food strategy team (listed in section 3 below).
 - Discuss them with Henry Dimbleby in the 21 January 2020 Board meeting.
 - Endorse the proposed messages and/or suggest refinements.

2. Introduction

- 2.1 On 27 June 2019, Defra's Secretary of State commissioned Henry Dimbleby to conduct an independent review to help the government create a [National Food Strategy](#) (England-only).
- 2.2 The Strategy aims to ensure the food system:
 - a) Delivers safe, healthy, affordable food, regardless of where people live or how much they earn;
 - b) Is robust in the face of future shocks;
 - c) Restores and enhances the natural environment for the next generation in this country;
 - d) Is built upon a resilient, sustainable and humane agriculture sector; and
 - e) Is a thriving contributor to our urban and rural economies, delivering well paid jobs and supporting innovative producers and manufacturers across the country;
 - f) Delivers all this in an efficient and cost-effective way.

- 2.3 An interim report is due in March 2020, with the final report expected in autumn 2020. The government has committed to responding with a White Paper six months after the review is published. It has also asked Henry Dimbleby to review progress 12 months after that.
- 2.4 Henry Dimbleby is being supported by a secretariat in Defra and a team of expert academics.
- 2.5 A call for evidence ran over the summer and ended on 25 October 2019.
- 2.6 The FSA is represented on both the governance bodies for the strategy (Director General- and working-level), and FSA staff have ongoing engagement with both the Defra secretariat and the academic advisors, in particular through Professor Guy Poppy. FSA staff are engaging regularly with both the Defra secretariat and Henry Dimbleby's independent advisors. FSA staff have shared relevant research with the National Food Strategy team, for example on food crime and measures of trust in the food system.
- 2.7 Adopting a suite of metrics to measure the impact of the strategy is the present focus of the review team. The FSA is leading on the metric in relation to food authenticity and trust.
- 2.8 The review only covers England. The Welsh Government completed a consultation during 2019 on their update to their Food and Drink Action Plan, which was a joint consultation with the Food and Drink Industry Board. The Welsh Food and Drink Action Plan focuses on advancing the food and drink sector between 2020 and 2026, including:
- Targeted investment to help businesses grow.
 - Providing attractive careers and developing skills.
 - Creating a partnership with the food and drink sector.
 - Showcasing the sector through Taste Wales.
- 2.9 Other aspects of the National Food Strategy, for example how the food system delivers safe, healthy, affordable food, and the sustainability of the food system, will be considered by Welsh Government officials during the course of their work given the requirements of the Well-Being of Future Generations (Wales) Act 2015. FSA officials have regular liaison meetings with Welsh Government officials, including the team producing the Food and Drink Action Plan update, in order to stay informed of their work and share any relevant guidance, best practice or expertise.
- 2.10 The development of a Future Food Policy is in early stages in NI. DAERA is currently facilitating a cross government approach in collaboration with the Department of Finance Strategic Insight Lab. The FSA is a key partner contributing to the early strategic direction of the policy.

3. Evidence and Discussion

- 3.1 The National Food Strategy will be a major driver of change for government food policy in England. A thriving food system is not possible without food being safe and what it says it is. The FSA is unique in government in providing this perspective, and representing consumer interests. With this in mind, there are number of areas that the FSA Board may wish to consider putting forward as the FSA position on the National Food Strategy:

Governance

- 3.2 The FSA would naturally be a strong supporter of what the National Food Strategy is trying to achieve, and the wide engagement going into its development. The power to make the necessary changes to the food system does not sit with one single body, so it is right that all those with a part to play are being involved. Change to the food system is a matter that requires long-term commitment, ambition and drive, beyond the period of a parliament. For these reasons, the FSA could call for an ambitious and radical approach to taking forward the recommendations of the review, and urge the National Food Strategy team to consider potential models for this. This would be supported if the National Food Strategy team could find ways of embedding the outcomes sought in legislation or wider initiatives, to maximise the chances of success.
- 3.3 Responsibilities for policies relating to food are currently split between several different departments, and we recognise the efforts the food strategy team is making to coordinate for the purposes of the strategy. The National Audit Office in their 2019 report *Ensuring food safety and standards* found that 'coordination of the food regulation system remains complex in high-risk areas'. This is a view that the FSA shares, and the FSA could ask that the review is ambitious in its proposals for governance solutions to bring together actors to manage the ongoing conflicts or trade-offs that will arise as the strategy is implemented.

Regulatory regime

- 3.4 Food safety is often taken for granted, but is in fact the result of decades of work by government and the food industry. This is at risk if there is not support for a stable, resourced and recognised regulatory regime. The National Food Strategy will not be a success if it does anything to jeopardise this, deliberately or as an unintended consequence of making changes elsewhere in the system. Consumers will not buy in to a food system if they don't trust the food, and a food safety outbreak could have a negative impact on perceptions of UK food.
- 3.5 The FSA could encourage the National Food Strategy to fully recognise the need for a functioning, coherent regulatory framework. At present, there are peculiarities in the system that will need to be remedied if an ambitious new strategy is to succeed. As a non-ministerial department, the FSA lacks the ability to make its own legislation, so has to go via other, ministerial departments. For example, the National Food Crime Unit requires access to

powers to enable it to fully fulfil its remit in relation to food fraud, which can only be granted through primary legislation. There is no other body with the primary aim of disrupting fraudulent behaviour related to food. We FSA could ask that the National Food Strategy includes practical consideration of how outcomes will be achieved, and whether those involved have the powers they need.

Delivery

3.6 At the other end of the policy-delivery spectrum, the delivery landscape should also be considered. The FSA has expertise in this area, as across England, Wales and Northern Ireland we have around 600 meat hygiene inspectors working in slaughterhouses, 6 wine and 34 part- and full-time dairy inspectors, and we work closely with the 387 local authorities who deliver food controls. We would be more than happy to share our knowledge and facilitate the food strategy team if they would like to understand this better and get out to see the frontline of food law enforcement. The role of local authorities in the landscape is significant, while funding pressures and difficulties recruiting have seen them having to make difficult decisions about prioritisation, resulting in reductions in numbers of food safety officers (down 13% per 1000 food businesses between 2012/13 and 2017/18) and food standards officers (down 45%). There are 354 local authorities in England, all with distinct geographical, demographic, financial and political identities, and different priorities as a consequence. They receive their funding directly from the Treasury – funding for food law enforcement services is made within overall funding made available to local authorities and is not ring fenced. This means that the FSA is not able to use it as a lever to encourage them to prioritise food work. With so many bodies involved, change takes time, and information sharing can be clunky. The FSA could ask that the food strategy is mindful of the practicalities of the delivery landscape, how these are changing (e.g. the challenges of regulating online businesses) and consider if it could add weight to cross-Whitehall discussions about ensuring a sustainably funded system for the food law regulatory regime.

Outcomes

3.7 The FSA should support the National Food Strategy's approach to metrics, and are pleased that food safety and trust in food will feature among the metrics. An outcome-based approach will be key to ensuring the strategy is ambitious and involves all players in the food system. The FSA could encourage the National Food Strategy team to consider examples of good practice in outcome-based cross-government working. This will be essential if the strategy is to foster a feeling of shared responsibility across a range of players.

Trust

3.8 The UK has an excellent reputation for producing food that is safe and what it says it is. Our own [composite measure of trust in food supply chains](#) rates it at 3.41 out of 5. A loss of trust in the food system can have catastrophic and long-lasting impacts. The BSE crisis cost the UK economy an estimated £3.7bn. A food crisis or scandal affects the whole sector, not only the

businesses or products involved. The FSA could therefore propose that the idea of “food we can trust” (combining food safety and authenticity) play a central role in the strategy, along with recognition that a strong regulatory regime and businesses playing their part are crucial.

Trade

3.9 Food safety cannot be compromised. High standards of food hygiene and authenticity, and the consumer confidence they engender at home and abroad, are absolutely fundamental for a thriving food economy. International trade in food requires trading partners having confidence in the food being traded, and also in the regulatory regime assuring the production of that food and its fitness for export. Whatever trade deals we strike once we leave the EU, a food safety regulator with the powers and resources it needs to support changing trade patterns will be important. The FSA could ask that this be reflected in the report.

Consumer focus

3.10 Dynamic global food trade now brings greater choices to UK consumers than ever before. This has facilitated changing dietary preferences, including generational patterns, and is paralleled by the advent of new purchasing practices (for example, online sales). Food is essential to our individual identity and it is essential that we follow and understand public perceptions and expectations. The FSA undertakes significant effort in this respect through a variety of methods including the [biennial Food and You survey](#), [biannual public attitudes tracker](#) and the [future of food-report](#). These record a variety of opinions, including those on sustainability and the environment, that help support trust and continuous improvement and communication of for example the [Food Hygiene Rating Score Scheme](#) - see also the [Chief Scientific Advisor's report on the scheme](#) - that empowers consumers make more informed choices about where they eat and drive-up food hygiene compliance standards¹. We believe that our work to understand consumer attitudes is unmatched, both in its frequency and depth. The FSA could invite the food strategy to take advantage of this resource in ensuring that the consumer perspective occupies its rightful place at the centre of the new strategy.

Data

3.11 There are major opportunities presented by data, in making supply chains more secure, increasing consumer trust and giving consumers access to information to make informed choices. The FSA has expertise in this area, having completed a number of blockchain pilots, and creating a register of 500,000 food businesses in England. We have also developed a series of data-enabled predictive analytics tools demonstrating the size of the opportunity – they are very powerful in getting over the message as to the scale of the opportunity for all actors. Much potential is untapped, however, because of issues around data sharing, data standards, commercial sensitivity and concerns about competition law. However, before trying to design the solution we need to

determine what data would be most valuable to the various actors. As half our food is imported, we would also want the data associated with that. The FSA could request that the food strategy recognises that data has incredible potential in relation to food, and that the FSA could potentially have a role as an independent, credible coordinating body for any new work in this area.

4. Conclusions

- 4.1 The National Food Strategy is an opportunity to bring about positive change in the food system. That food is safe and what it says it is is essential, and the FSA offers the review team support and expertise in ensuring that food safety and authenticity are at the heart of the strategy.

¹ Fleetwood, J., Rahman, S., Holland, D., Millson, D., Thomson, L. & Poppy G. 2018. As clean as they look? Food hygiene inspection scores, microbiological contamination, and foodborne illness. *Food Control*. DOI: 10.1016/j.foodcont.2018.08.034