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National Food Strategy Recommendations

1. Introduce a Sugar and Salt Reformulation Tax. Use some of the revenue to help get fresh fruit and vegetables to low-income families.

2. Introduce mandatory reporting for large food companies.

3. Launch a new “Eat and Learn” initiative for schools.

Escape the junk food cycle and protect the NHS
Recommendation 1
Introduce a Sugar and Salt Reformulation Tax. Use some of the revenue to help get fresh fruit and vegetables to low-income families.

The review recommends that the Government should introduce a £3/kg tax on sugar and a £6/kg tax on salt sold for use in processed foods or in restaurants and catering businesses.

Food manufacturers would then be incentivized to reformulate their products to contain less sugar and salt, in order to avoid having to put prices up. Products which are not reformulated and remain high in sugar and salt would be more expensive, and therefore less appealing, to consumers.

The proposed tax would be mandatory for food companies; this is an important strength as previous voluntary salt and sugar reduction programmes have had limited effectiveness, whereas implementation of the mandatory UK Soft Drinks Industry Levy (SDIL) in 2018 led to significant reductions in the sugar content of drinks.

The NFS review authors also cite evidence from Mexico, Barbados and South Africa which further supports the effectiveness of sugary drink taxes in terms of initiating reformulation as well as reducing sales and consumption.

Placing more onus on the food industry to make changes, and less on individuals, is a welcome initiative. The proposed action also covers a wider range of products than the SDIL which provides greater opportunity to change diets and impact on health outcomes.

“Placing more onus on the food industry to make changes, and less on individuals, is a welcome initiative. The proposed action also covers a wider range of products than the SDIL which provides greater opportunity to change diets and impact on health outcomes.”

Leeds and Newcastle are working with over 20 European partners to develop new evidence on the long-term benefits and potential risks of using sweeteners and sweetness enhancers to achieve sugar reduction in a range of food and drink products.

The proposed tax could disproportionately affect households on low incomes. A particular concern is that people may compensate for rising prices of high-sugar and salt foods by reducing their purchases of healthier foods. To mitigate this unintended outcome, the NFS recommends that the revenue generated by the tax cost each household £172 extra a year “in The Sun). However, the document cites a number of surveys which consistently show that most respondents are concerned about the sugar content of food and support taxes on foods high in sugar and salt.

Interestingly, the authors note that this support did not extend to a hypothetical “meat tax” - in fact, this was the least popular of any of the measures they discussed with citizens during their preparatory public engagement work. It is however difficult to use surveys and focus groups to gauge public opinion. Often people’s true preferences are revealed by purchasing habits, which is often at odds with what they tell researchers in surveys.

Key Points
• Making tax mandatory is an important strength, and likely to lead to increased success, as evidenced by results of the UK Soft Drinks Industry Levy.

• Further innovation is needed to solve the technical challenges presented by food reformulation. N8 AgriFood researchers are working to develop new evidence on the long-term benefits and risks of sweeteners as an alternative to sugar.

• Increasing taxation is a politically sensitive approach, vulnerable to opposition fuelled by the popular press. It carries a risk of consumers compensating for rising prices of high-sugar and salt foods by reducing purchase of healthier foods. The suggested use of revenue to support low income families access fresh fruit and vegetables is therefore vital, but it must also be transparent.
Recommendation 2
Introduce mandatory reporting for large food companies

Mandatory reporting of a range of metrics will generate insight that has not yet been seen regarding foods available within the UK food system.

The act of reporting will be an incentive for business to better understand the health aspects of their sales and will facilitate recognition for businesses promoting good dietary behaviours, making health a competitive space within the food system. This would then be advantageous for the business, not just a burdensome requirement of legislation. The mandatory aspect of reporting helps to level the playing field for these businesses given that this will generate additional work for data teams.

The recommendation will be cross cutting, supporting evaluation of all four strategic objectives. We would like to have seen a more detailed, cross cutting model to be introduced.

The aspiration here should be to update reporting in real-time.

Key Points
• Reporting provides an opportunity for recognition for business promoting good dietary behaviours, creating a competitive market place for healthy and sustainable food.
• Data from small businesses needs to be captured, to motivate those often serving deprived communities to improve health aspects of their offering. Could manufacturers and wholesalers supplying smaller outlets extend their reporting to capture this aspect of the food system?
• Consistent definitions for metrics and categorisation needs to be supplied for food companies to report against. Metric reporting should be future-proofed for changes in reporting. The aspiration should be to update reporting in real-time.
• Challenges could be avoided through Government provision of a centralised tool for all companies to use for reporting. Government enforcement needs to be transparent.
• Use the same, up to date records, and that cost of access to this data is not prohibitive. Many challenges could be avoided if the government were to provide, or endorse, a tool for all companies to use, maintained by a central organisation. Government enforcement of the regulations needs to be transparent and include information regarding the share of liability.

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"Where legislation is applied to food categories, there needs to be a standard categorisation system, which would ensure consistency of reporting and support enforcement. Point of sale records need to be consistently linked to nutrition related metrics, ideally via the bar code. It is important that all companies use the same, up to date records, and that cost of access to this data is not prohibitive. Many challenges could be avoided if the government were to provide, or endorse, a tool for all companies to use, maintained by a central organisation. Government enforcement of the regulations needs to be transparent and include information regarding the share of liability."

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his recommendation follows up on the recommendations of the 2014 School Food Plan, also co-authored by Henry Dimbleby. This led to practical cooking and nutrition being made part of the National Curriculum for 4 to 14 year olds, as well as free school meals for the first 3 years of school.

We are pleased to see Recommendation 3 (R3) extends the food education programme to bring sensory food education for children aged 5 and below (early years), which has been shown to increase fruit and vegetable consumption. Furthermore, it seems like a clear win-win for government to provide funding for cooking ingredients required for cooking lessons, as proposed in R3. It would be a recipe for failure if we expected children to bring in equipment for science experiments, so why should families pay for and source the ingredients for cooking lessons?

The NFS reports that the quality of the cooking and nutrition education is not high enough in many schools, therefore R3 proposes a new ‘Eat and Learn’ programme to be overseen by the Department for Education.

This is proposed to include mandatory accreditation of the school’s approach to food, for example by the Food for Life scheme. This scheme contains a wealth of excellent requirements. However, we expect most schools would fail to achieve the minimum Food for Life accreditation of ‘Bronze’ without significant improvement, so whether this mandatory accreditation is effective in raising standards depends on whether schools are concerned about getting a ‘below Bronze’ result, or whether schools are rewarded for getting better accreditation results. It is also not clear whether the proposed R3 budget includes financial support for schools to carry out the extra work.

R3 proposes Ofsted inspection of the quality of food and nutrition lessons to occur at the same cadence as English and Maths lessons. This would follow up on Ofsted’s 2018 survey which found that in practice only one quarter of all primary schools are actually offering cooking activities. We agree that food education is as important as the other core subjects, especially given so many lives are now blighted by non-communicable diseases caused by poor diet. R3 also tries to address the underlying causes identified for the lack of delivery of the curriculum, proposing better training for primary teachers, although it’s not clear how this would be funded.

R3 extends to older children by proposing reinstatement of a re-designed food A-level, and a review of other qualifications including T-levels, and recruitment to address the shortage of specialist food teachers in secondary schools. It also proposes to improve the quality of school food, and thus uptake, by upskilling caterers and school leaders. This specialist education provides a promising way to improve health and environmental impacts without requiring the customers to become knowledgeable themselves. This will also help enable R3’s proposal to drop the requirement to serve meat three times a week from the School Food Standards, which we agree with.

However, we are disappointed by the lack of emphasis on the impact of food on climate change. As highlighted by the NFS, food is the second-biggest contributor to climate change, after the energy sector, and climate change is on course to disrupt our food supplies. How can we address this? The NFS explains eloquently in Chapter 4 that school education is not sufficient to change dietary choices through individual actions. Therefore food policy change is essential. However, we believe that across-the-board education on food climate impacts is essential. Why? The NFS has highlighted the political obstacles which confront food policy changes, which it gives as the reason for not suggesting a meat tax. So how can we address this public unpopularity? Although education does not necessarily change individual actions, it has been shown to increase receptiveness to new policies. That is why we believe we need a massive education programme for all students on the climate impacts of food, as an essential ingredient in a recipe for successfully transforming the food system.

**Key Points**

- Specialist education in secondary schools provides a promising way to improve health and environmental impacts without requiring the customers to become knowledgeable themselves, and will also enable the proposal to drop the requirement to serve meat three times a week from the School Food Standards, which we agree with.

- Schools may struggle to reach high Food for Life scheme accreditation. Will they receive financial support for the extra work needed to meet accreditation standards?

- We are disappointed by the lack of emphasis on the impact of food on climate change. Education can address public unpopularity of food policy changes.

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**Recommendation 3**

Launch a new ‘Eat and Learn’ initiative for schools

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“We need a massive education programme for all students on the climate impacts of food, as an essential ingredient in a recipe for successfully transforming the food system.”
Strategic Objective 2

Reduce diet-related inequality

National Food Strategy Recommendations

4. Extend eligibility for free school meals.

5. Fund the Holiday Activities and Food programme for the next three years.

6. Expand the Healthy Start scheme.

7. Trial a “Community Eatwell” Programme, supporting those on low in-
Recommendation 4
Extend eligibility for free school meals

The first National Food Strategy report in 2020 (Part One) recommended expanding the eligibility for the Free School Meal (FSM) scheme to include every child, up to the age of 16, from a household where a parent or guardian is in receipt of Universal Credit, or equivalent benefits. This was not implemented by Government.

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The second National Food Strategy report urges FSM provision as a priority, alongside other initiatives such as the Holiday Activities and Food programme and the Healthy Start scheme.

Unfortunately, in 2021 Autumn budget there was nothing from the UK Government on raising eligibility for FSM.

The rollout of Universal Credit led to a huge increase in FSM eligibility and food insecurity has been exacerbated by the Covid 19 pandemic. Currently, many families who are “just managing”, often those experiencing in-work poverty, do not qualify for FSM. If these families have more than one child they face an average cost of £2.30 per child per day and many in this “poverty trap” resort to packed lunches which are of variable and often inferior nutritional quality.

The National Food Strategy pays less attention to breakfast and its importance for children and young people. Recommendation 4 recognises that “Children with empty stomachs struggle at school: they find it hard to concentrate, their behaviour deteriorates, and they are more likely to be disruptive in class” (p151) but does not consider that most of the core school curriculum is taught before lunch. Therefore, breakfast is essential for effective learning and habitual breakfast consumption is associated with better academic outcomes and in-class behaviour.

The quality of the breakfast is of course important for overall dietary quality and health. Data suggests that many school breakfasts do not comply with School Foods Standards, according to Guy’s and St Thomas’ Charity, but the National Food Strategy falls short of recommending universal free school breakfasts meeting these standards as proposed in Emma Lewell-Buck’s private member’s bill.

Key Points

- Currently many families who are “just managing”, often those experiencing in-work poverty, do not qualify for free school meals.

- More than 20% of children eligible for free school meals do not take them. Implementing free school meals in a way which removes stigma is important. Giving the same choice as their paying peers removes exposure as a free school meals recipient.

- Recommendation 4 recognises that “Children with empty stomachs struggle at school: they find it hard to concentrate, their behaviour deteriorates, and they are more likely to be disruptive in class” (p151).

However the NFS does not consider that most of the core school curriculum is taught before lunch. Breakfast is essential for effective learning and habitual breakfast consumption is associated with better academic outcomes and in-class behaviour, therefore universal free school breakfasts, meeting School Food Standards, should be recommended.
Recommendation 5
Fund the Holiday Activities and Food programme for the next three years

Following a recommendation in Part One of the National Food Strategy, the Government rolled out the Holiday Activities and Food programme (HAF) to all areas in England for the duration of 2021.

These holiday clubs are free to all children in receipt of free school meals (FSM) and run over school holidays in the summer and at Christmas. They provide hot food, cooking lessons, sports and fun activities for children, as well as advice for families and carers on how to source, prepare and cook nutritious, low-cost food.

The current recommendation is for the programme to be funded for the next three years. Given the extent of “holiday hunger” (exacerbated during the pandemic) and the wide-ranging negative impacts this has on the lives of children, it is surprising that the Government had not already committed to this.

In the Autumn Budget statement 2021 the Government announced that HAF will continue to be funded. However, we still await the detailed published figures to see if it matches or goes beyond this years funding of £220million.

The recommendation to extend eligibility for FSM (recommendation 4), if taken up by the Government, would further increase the number of children who can benefit from the programme.

The review document cites a number of evaluations which indicate positive impacts of holiday food programmes on children’s diet, activity levels, socialisation and wellbeing, academic attainment and parental wellbeing.

Reviews of relevant peer-reviewed studies indicate more mixed findings; however, there are relatively few academic studies which have focused exclusively on holiday club provision, and methodological improvements are needed in order to reach more robust conclusions.

According to senior stakeholders (who are responsible for facilitating and implementing holiday provision programmes), these programmes have an important role in addressing financial hardship, isolation, supporting parents, and play and childcare provision.

These stakeholders also identified a number of barriers to effective delivery of holiday provision including capacity, attendance and reaching families most in need.

Moving forward, it will be important to ensure that the provision is accessible, inclusive and meets the needs of a range of groups including adolescents, families with disabilities, and black and minority ethnic groups.

Recommendations from FixOurFood’s review of the 2021 Holiday Activities and Food Programme, in collaboration with The Food Foundation

1. The HAF programme funding should be extended for future school holidays. Despite the short turnaround time, the substantial efforts of local authorities and providers this year resulted in successful programme implementation, building the foundations for future holiday provision. Local authorities and providers have stressed the importance of guaranteed long-term funding for successful future planning and implementation. Continued evaluation of the scheme should be in place to ensure that it is being delivered to a high standard and reaching all children and families in need of support in the holiday.

2. A universal offering of the programme should be implemented where possible. Data from this research demonstrate that HAF is a lifeline for many families, regardless of FSM eligibility. Local authorities should be encouraged to allow all children to attend the HAF programme, seeking affordable activity charges at the discretion of individual providers for non-FSM children. Relationships between schools, local authorities and providers must be built upon an understanding that HAF is open to all children which will help reduce stigma. This should be implemented using a simple, streamlined system accessible to all that overcomes language barriers and digital exclusion. Efforts should be made to ensure that FSM children are indistinguishable from non-FSM children throughout the activities.

3. The continued provision of tasty and varied meals should be an important part of the HAF programme. Food provision varied across authorities and providers. The offer should not only meet School Food Standards but go above and beyond the minimum requirement to ensure a variety of quality food which is nutritious and appealing to children. Providers should involve children and young people in planning food provision and other food activities. Food could be further embedded within activities, and providers should be encouraged to be as creative as possible in incorporating food. Providers could also partner with school food catering partners, as well as local food hubs, food trucks and school food canteens which are generally vacant during school holidays. Ensuring a consistently high standard of food across activities will not only help to combat holiday hunger but also ensure children have opportunities to enjoy a varied diet incorporating healthy and tasty food which might not otherwise be available to them.

The N8 AgriFood Food Systems Policy Hub works to promote and support food-related policy engagement arising from projects across the N8 Universities. One such project is the FixOurFood Programme, hosted by the University of York, and led by the Policy Hub’s director Professor Bob Doherty. FixOurFood is one of four research consortia funded by the £47.5m ‘Transforming UK Food System, Strategic Priorities Fund Programme’ delivered by UKRI, another of which is 3H hosted by The University of Sheffield. This summer, researchers from FixOurFood, in collaboration with The Food Foundation, undertook an evaluation of the implementation of the summer 2021 Holiday Activities and Food programme, with a focus on delivery across Yorkshire. FixOurFood researchers, along with colleagues from the Food Foundation, pulled together a report of preliminary key findings and key recommendations to support future funding decisions.
Key Points

- Only a small number of families experiencing food insecurity are eligible for the current scheme, and low awareness among the target population has been previously reported.
- Parents and caregivers will need support on appropriate evidence-based strategies to encourage consumption among children.
- Affordability isn’t the only barrier to be addressed; must also consider quality, cultural appropriateness and availability.
- The National Food Strategy recommends that income generated from the sugar and salt reformulation tax should be used to help the least affluent members of society to access healthy food. There are four recommendations (4-7) which outline certain mechanisms which could partly achieve this. Three out of the four recommendations are aimed at low-income households with children. There is very little recommended in the way of support for adults (without children) experiencing food insecurity, including older adults for whom food insecurity is often hidden.

Recommendation 6
Expand the Healthy Start Scheme

The review recommends that the Government should expand the Healthy Start voucher scheme to all households earning under £20,000 with pregnant women or children under five.

Healthy Start vouchers can be used to buy £4.25 worth of fruit, vegetables and milk per week. The scheme is currently available to pregnant women and families with children aged 3 years or under if they receive one of a number of qualifying benefits. As a result of this, only a small number of families experiencing food insecurity are currently eligible.

Research indicates that people experiencing food insecurity want to eat healthy foods but cannot afford to do so. The vouchers can address this significant barrier, and the current recommendation to expand the scheme is therefore very welcome.

The review also recommends a number of actions by the Government to increase uptake among eligible people. This is important because low awareness of the voucher scheme among the target population has been previously reported.

As supporting evidence, the review document cites a number of academic studies which show beneficial effects of discounts and vouchers for healthy foods on purchases and consumption.

However, one of the cited systematic reviews also acknowledged that there was a limited amount of high-quality evidence addressing the impact of food subsidy programmes on child and adult health and nutrition.

Young children will often initially reject the flavour of vegetables, and may need to taste a novel vegetable 8 to 10 times before they will eat it. Vouchers can help families on low incomes with provision of vegetables to facilitate repeated tastings and subsequent learned acceptance. Parents and caregivers will also need guidance and support on appropriate evidence-based strategies which they can use to encourage consumption. Affordability is not the only barrier to fruit and vegetable intake which needs to be addressed. The success of the voucher scheme will depend on good-quality, culturally appropriate fruit and vegetables being readily available to purchase in local communities – individuals should not have to travel longer distances than they usually would in order to redeem their vouchers.

Having suitable cooking skills will be important. Families will also need adequate cooking and food storage facilities at home.

Food insecurity is also strongly associated with parental stress, which may make it harder to engage in effortful behaviours such as preparing meals from scratch and thinking of inventive ways to use fresh vegetables.

“Having suitable cooking skills will be important. Families will also need adequate cooking and food storage facilities at home.”
The National Food Strategy’s Recommendation 7 involves setting up community-based programmes that can “prescribe” free healthy foods, particularly fruit and vegetables, to those who are on lower incomes and are in greatest need of dietary support.

The proposal envisages partnerships between Primary Care Networks and local organisations and initiatives to deliver “produce prescriptions” as well as complementary support such as cooking classes. There is much to commend about this proposal. Healthiness of diets follows a strong income gradient, and this proposal is appropriately targeted towards low-income groups with greatest need of dietary assistance. The intervention would help attenuate the critical affordability constraint that limits dietary improvement.

The complementary support to help overcome knowledge and motivational constraints is just as vital. An underappreciated aspect of the UK’s food system is the current strength of its local food movements, and this recommendation rightly proposes leveraging these in delivering this intervention. Careful targeting can help ensure that this policy is focused on subsidies that will be cost effective long-term, and the envisaged flexibility to adapt the programme on a local basis is appropriate.

Although the policy may sound unconventional, several healthy food prescription interventions have already been trialled in high-income countries, albeit largely at a pilot scale. Examples include a fruit and vegetables prescription intervention at a health care centre in the northwest of the UK, involving subsidy vouchers for fruit and vegetables at a local supermarket.

A recent systematic review collated the evidence on how these prescription interventions have impacted dietary and health outcomes, and found that they have indeed increased fruit and vegetable consumption, and lowered body mass index and blood glucose levels.

However, no influence could be detected on other cardiovascular health indicators such as blood pressure. The review stresses that the evidence base is thin and that more and larger studies are needed. Nevertheless, it could be said that the evidence on “produce prescription” thus far is promising, but that we cannot expect too much of it as a standalone programme – as with many other National Food Strategy recommendations, the intervention is best considered in tandem with other, synergistic initiatives.

An important such complementarity is with Recommendation 1 on taxation to encourage sugar and salt reformulation.

A common criticism of such taxes is that they could be passed on to consumers as price increases, and that any increase in price will be regressive, i.e. have strongest economic impact on the poorest.

Recommendation 7 that subsidises healthy foods for the poorest would be complementary to the tax policy, reinforcing the move towards healthier diets and lowering the economic burden associated with the move.
Strategic Objective 3

Make the best use of our land

National Food Strategy Recommendations

8. Guarantee the budget for agricultural payments until at least 2029 to help farmers transition to more sustainable land use.

9. Create a Rural Land Use Framework based on the three compartment model.

10. Define minimum standards for
**Recommendation 8**

Guarantee the budget for agricultural payments until at least 2029 to help farmers transition to more sustainable land use.

This is a much welcomed recommendation, particularly as it brings up the issue of tenancy and the provision of environmental goods.

We agree time scale is an important issue in relation to this, and there is a need for the encouragement of longer tenancy agreements in order to facilitate farmers engaging in providing ecosystem services that will have a payback in future years.

We also welcome the recommendation to reduce the complexity to join agri-environmental schemes. The document suggests developing schemes to encourage natural carbon removal and habitat restoration. Undoubtedly these actions would bring environmental improvements. However, there are a number of points not discussed that are important to consider...

There is a need for the encouragement of longer tenancy agreements in order to facilitate farmers engaging in providing environmental outputs that may take years to achieve.

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**Additional points to consider**

1. There will be different ways to achieve natural carbon removal (tree restoration, agricultural management) and habitat restoration. Decisions on what to encourage where need to take into account local conditions.

2. How will the price paid to farmers be established? A combination of different approaches is proposed in order to encourage/incentivise farmers to carry the desired reforms out (output based payments, input management based payments).

3. We feel there is a missed discussion on how the budget would be distributed amongst farmers. In particular, the heterogeneity in landscapes needs to be taken into consideration. When planning to restore forest, peat, or priority habitat the relative social value of restoration needs to be taken into account. This is likely to vary across space too (e.g. it may be more valuable for society to restore a forest close to where people live). Taking this into consideration may mean that farmers would need to be paid at different rates depending where their farm is located.

4. The report argues to transform unproductive land into different landscapes: “Some of this unproductive land is exceptionally well suited to creating environmentally friendly landscapes, ranging from species-rich wood pasture grazed by rare breed cows, all the way to new biodiverse forests and rewetted peat bogs”. The argument is that low productive land only produces less than 3% of our calories and therefore we can transform this into forests. This argument only focuses on one aspect, which is land market oriented productivity. This may not be the only option available. Less productive land may already provide a habitat for species and sequester carbon.
We welcome that land use is directly addressed in Recommendation 9: how we use land is central to addressing climate change, biodiversity loss, environmental degradation and food security.

The National Food Strategy suggests Defra takes a data-driven, three compartment model inspired approach to developing a Rural Land Use Framework, for open use by landowners and farmers.

We agree that better data and modelling are needed to inform our use of land to meet food, climate, biodiversity and other environmental goals, whilst allowing for urban development.

The example of carbon nature food maps in Recommendation 9 help illustrate the thinking behind this recommendation. However, we suggest that significant research is needed to develop this approach into a fully functional analysis.

In response, we highlight five areas of concern and opportunities for developing a land use framework:

1. **The current three compartment model misses nature and the urban land opportunity:** The three compartments in the recommendation differ to those in the original model (Rinch et al., 2019) – instead of a third compartment for nature, a compartment for housing and economic development is recommended. This has the (likely unintentional) potential to weaken the protection of nature. Importantly, it also misses the opportunity for carbon protection/sequestration, food production and biodiversity presented by better planning of urban land. Research, for example in the UKRI Global Food Security Programme funded Rurban Revolution project, points to the productive, sustainability and health value of urban land in the food system.

2. **Dynamic data and understanding is vital:** Land and soils are not a static resource. Generally, the analysis approach put forward here is static, the priorities set are based on current yields and land use. It does not consider whether the capability of land is deteriorating after decades/centuries of agriculture, which we know to be common (e.g. Evans et al, 2020). It is important that we consider how the capability of land and soils will change in future and interact with future climate change, and process-based models are key to this understanding. Arguably, basing priorities on current land use also misses the opportunity for positively reconsidering what we grow and where.

3. **Take soil carbon into account:** The opportunity for increasing soil carbon in high yielding areas through changing practice is missed. It is also not clear whether the areas highlighted as good candidates for forest creation consider current carbon storage. For example, grazed grasslands, which may be classed as low productivity in this analysis, can have large existing soil carbon stores, resulting in lower carbon gains from afforestation (e.g. Guo & Gifford, 2002). Also, how can practices such as agroforestry also be considered in this data approach?

4. **Go further than carbon and biodiversity:** The opportunity is there to consider where land provides ecosystem services beyond carbon and supporting biodiversity, such as water flow regulation, particularly giving the increasing frequency and severity of extreme weather events under climate change.

5. **It’s not just about calories:** Current calorie production is used to highlight the land that should be prioritised for high yield farming in the example analysis. This does not account for low calorie crops that are nutritionally important or considers what needs to be produced to support a healthy diet.

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**Recommendation 9 misses the opportunity for carbon protection/sequestration, food production and biodiversity presented by better planning of urban land.**
Recommendation 10
Define minimum standards for trade, and a mechanism for protecting them.

Recommendation 10 of the National Food Strategy is not so much a recommendation as a lament of the Government’s failure to live up to 2019 Election Manifesto that “in all of our trade negotiations, we will not compromise on our high environmental protection, animal welfare and food standards.”

Part One of the NFS recommended a relatively detailed (if somewhat controversial) “verification” system, under which the UK’s trade partners would need to demonstrate that they met a set of UK “core standards” for food production to qualify for duty- and quota-free treatment.

The report suggested that it would be for the Trade and Agricultural Commission (TAC) to define what these standards were, while stating that, at a minimum, they would “cover animal welfare concerns and environmental and climate concerns where the impact of particular goods is severe.”

The tone of Part Two of the National Food Strategy suggests that Henry Dimbleby is clearly frustrated with the Government’s failure to respond to the TAC Final Report, which was published in March 2021. The Government’s response was published in October 2021, but notably rejected the NFS and TAC recommendations on a mandatory trade mechanism for protecting UK food standards.

The fact that free-trade deals with both Australia and New Zealand have been agreed ‘in principle’ without, it seems, any agricultural safeguards suggests that protecting the UK’s food standards from low-cost imports is not a high priority for the Department for International Trade (DIT). As the National Food Strategy puts it:

“At a time when the government is asking our own farmers to raise their environmental standards higher than ever, this (free trade agreements without agricultural safeguards) would be an extraordinary failure of joined-up thinking. It would make it much harder to achieve the other goals we have set for our food system and undermine many of the recommendations we have made elsewhere in this Strategy.”

The fear is that, having conceded to Australian and New Zealand export interests in the desire for a free trade deal, the UK Government will be unable to resist similar demands for other, more powerful agricultural exporters like the US and Brazil. This much is possible.

In sum what is clear is that UK trade policy has the potential to derail many of the domestic policy reforms that the National Food Strategy would like to see implemented.

The early indications are that sacrificing the UK’s farmers and the food standards which they uphold is, for many in Government, a small price to pay for furthering its ‘Global Britain’ free trade agenda.

Key Points

- Part One of the National Food Strategy recommended a “verification” system for UK trade partners, with standards to be set by the Trade and Agriculture Commission.
- Part Two suggests frustration at the Government’s failure to respond to the Trade and Agriculture Commission’s Final Report, published in March 2021.
- An ‘agreement in principle’ for a UK-Australia free trade deal without agricultural safeguards suggests protecting UK food standards is not a priority of the Department for International Trade.
- UK trade policy has the potential to derail many of the domestic policy recommendations within the National Food Strategy.

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The Government must draw up a list of core minimum standards which it will defend in any future trade deals, and then set out which mechanisms it intends to use to protect these standards.

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Strategic Objective 4

Create a long term shift in our food culture

National Food Strategy Recommendations

11. Invest £1 billion in innovation to create a better food system.

12. Create a National Food System Data programme.

13. Strengthen Government procurement rules to ensure that taxpayer money is spent on healthy and sustainable food.

14. Set clear targets and bring in legislation for long-term change.
Recommendation 11
Invest £1 billion in innovation to create a better food system.

This is a welcome recommendation, recognising that improving the food system will require innovative solutions underpinned by collaborative research and meaningful dialogue between all stakeholders.

The UK food industry is already one of the most innovative, efficient and fast-moving in the world. The demand for alternative proteins, in particular from plants, but also from fungi and insects, exceeds production capacity.

Meeting a rapidly rising consumer demand is currently only achievable with UK-grown agricultural produce. Furthermore, there are many scientific, technical and engineering challenges that need to be overcome to produce these protein ingredients at scale. Meeting demand will require considerable and sustained investment in human capability and infrastructure.

The term “alternative proteins” is loosely applied to protein ingredients that are not meat or dairy, and therefore assumed to have positive (or less negative) environmental impacts. Their health benefits are still the question of debate and require scientific exploration. It must also be emphasised that alternative protein ingredients are not foods. These ingredients require formulation into safe, nutritious products that consumers can afford and will enjoy eating.

Investment in food science, as well as sensory and nutritional science research, is essential to allow these products to become mainstream.

The proposed investment in physical facilities could accelerate knowledge transfer. But a single physical focus may neglect the diversity and complexity of the UK food system.

A proposed first step could be a mapping of existing facilities, including research and innovation centres, and the creation of a sustained funding programme, supported by industry, public health, policy and consumer bodies, that pushes the boundary of knowledge from fundamental science to realistic industry applications that benefit consumers and the planet.

The focus on dietary protein is, in many ways, not holistic. One must not lose sight of the purpose of the strategy to improve dietary health. Producing climate smart food commodities will not solve dietary health challenges. Meeting nutrient needs requires food diversity, along with biodiversity, to be a key measurable goal for the strategy.

One must not lose sight of the purpose of the strategy to improve dietary health. Producing climate smart food commodities will not solve dietary health challenges. Meeting nutrient needs requires food diversity, along with biodiversity, to be a key measurable goal for the strategy.

We welcome the plans for a £50 million fund to the likes of the Agriculture and Horticulture Development Board to assist the long-term of the Evidence for Farming Initiative (EFI), however such sums are dwarfed by corporate funds as we are already seeing some of the non-traditional tech giants entering the agri-tech domain. The obvious ones are the likes of Microsoft and Google, who both have agri-tech divisions to take advantage of deploying their core data-mining capabilities into global farming and supply chain management. Food policy should make best use of these EFI funds. The sector would applaud the idea of £50M to give the EFI longevity but it is in helping to identify and seed those initial areas of innovation between farmers, engineers and bio scientists where there is a gap in current practice. Once seeded, verified and IP protected then the big agri-tech and technology companies will naturally move in and the public investment will pay dividends, both in economic returns and sustainable product delivery.

Key points
- A proposed first step could be a mapping of existing facilities, including research and innovation centres, and the creation of a sustained funding programme, supported by industry, public health, policy and consumer bodies, that pushes the boundary of knowledge from fundamental science to realistic industry applications that benefit consumers and the planet.
- A meaningful and unbiased dialogue on processed foods must take place. Efforts need to be made to increase transparency on the environmental impacts of ingredients and food processing.
- We would like to see more mention of the agri-tech sector in relation to investment in innovation. The sector would applaud the idea of £50M to give the Evidence for Farming Initiative (EFI) longevity but it is in helping to identify and seed those initial areas of innovation between farmers, engineers and bio scientists where there is a gap in current practice. Once seeded, verified and IP protected then the big agri-tech and technology companies will move in and the public investment will pay dividends.

Investment will seed a change in culture that recognises the importance of food research and innovation in all aspects of the food system. We would like to see more mention of the agri-tech sector in relation to investment in innovation.
Recommendation 12
Create a National Food System Data programme.

The National Food System Data programme presents a solution to digitise the food system, which is especially welcome.

This data programme would be a cross cutting theme that supports other recommendations. It will provide important guidance and support for mandatory reporting of data in Recommendation 2 and should support data requirements of other recommendations to allow for effective evaluation and monitoring, something which has been lacking for previous government policies.

We welcome the move towards consistency and transparency in reporting, and the recognition that cross-departmental collaboration is required to capture the breadth of metrics related to the food system.

The National Food System Data Programme should be designed to cover metrics that facilitate evaluation for each of the National Food Strategy recommendations.

Based on the table on p58 of “Recommendations in full” data requirements that cover aspects of schools and the public sector appear to have been omitted. Specifically:

- Data from educational settings e.g. Ofsted metrics generated from the new "Eat and learn" initiative (Recommendation 3)
- Free School Meals eligibility and uptake (Recommendation 4)
- Public sector procurement metrics to enable monitoring and review of procurement against government rules (Recommendation 13)

It will be important to ensure that implementation of the programme serves the needs of users from different sectors. It should be easy to use, to upload information to, and to extract insights from (as appropriate). Where user interaction with the data programme is easy and a clear benefit can be derived, users are far more likely to fully engage. In some cases, the programme should consider supplying tools to support stakeholders with upload of information in a consistent manner, for example to generate HFSS scores and upload information about sales of these products.

Creating a dashboard view at different geographic scales recognises the needs of different organisations that operate at different scales. For example, including Local Authority ‘view’, along with smaller census geographies, would prove a valuable tool for local actors within food system policy for scenarios such as Supplementary Planning Documents that aim to control the locations of hot food takeaways. This would enable both national and local policy responses.

The programme should consider availability of data for research and incorporate how data can be used to monitor success of Government policy and its wider impacts on population and environmental health. This programme will be such an important resource for many stakeholders as we come together to improve the food system and the subsequent health of our society and planet.

While it is essential to protect personally and commercially sensitive information, it is also essential to optimise the data for research to inform positive change wherever possible.

The coronavirus pandemic presents a pertinent example of where a National Food System Data programme could have supported the nation in response to an unprecedented system shock.

The programme should consider availability of data for research and incorporate how data can be used to monitor success of Government policy and its wider impacts on population and environmental health.

Key Points

- The National Food System Data Programme should be designed to cover metrics that facilitate evaluation for each of the National Food Strategy recommendations.

- It will be important to ensure that implementation of the programme serves the needs of users from different sectors.

- Creating a dashboard view at different geographic levels would enable the needs of different organisations that operate at different scales to be recognised. For example, including Local Authority ‘view’, along with smaller census geographies, would prove a valuable tool for local actors within food system policy, and enable both national and local policy action.

- The programme should consider availability of data for research and incorporate how data can be used to monitor success of Government policy and its wider impacts on population and environmental health.
Recommendation 13
Strengthen Government procurement rules to ensure that tax-payer money is spent on healthy and sustainable food.

We have previously highlighted the significant opportunities afforded by the harnessing of public procurement are not being fully exploited. Chief amongst the identified barriers is the absence of clear regulatory directives on sustainable procurement practices, and the difficulties faced by small-scale sustainable food suppliers to engage with, and compete for, large public procurement tenders.

Our conclusions are echoed in the National Food Strategy (NFS) report, which recognises the potential potency of public procurement as “the Government’s most direct tool to shape the food system”.

However, the report considers this tool is not being used as effectively as it should be with much of the food procured for public bodies being poor quality, unappealing, unhealthy, with insufficient consideration given to the environmental impact of the food served.

Recommendations to redress the lack of a clear regulatory steer are firmly focussed on the current Government Buying Standards for Food (GBSF). The GBSF outlines a set of minimum mandatory standards – and non-mandatory best practice standards – for inclusion in central government tender specifications and contract performance conditions. In its current form, the GBSF falls short in the promotion of public procurement as a force for significant change in the UK food system.

First, the standards are often not adhered to and little is done to monitor or enforce them. The standards also give little direction on the quality of food procured; public bodies are not required to procure food that meets the Government’s own Eatwell Guide nutritional guidelines.

Crucially, the GBSF permits the prioritisation of price over quality in procurement practice in some instances. Food can even be procured from imported sources that do not adhere to production standards legally required of UK producers if to do otherwise would incur significantly greater cost.

The GBSF also only apply to central government bodies – hospitals, prisons, the armed forces – meaning a significant proportion of public bodies – e.g. local government; schools, hospital visitor and staff catering, care homes – are not required to adhere to them.

The NFS outlines a number of recommendations to better harness the potential of procurement. Prime amongst these is redesigning the GBSF to prioritise quality over cost with targeted tender weightings given to public priorities such as health, sustainability and social value.

Tenders should meet an “achievable but high baseline” on quality that should adhere to a newly developed healthy and sustainable Reference Diet. This Reference Diet should inform all food related policy and procurement decisions in the public sector, including extending beyond central government operations to encompass all public sector organisations in which taxpayers’ money is spent on the acquisition of food.

The quality and sustainability of food procured should be further assured by regular monitoring and enforcement, and the introduction of mandatory accreditation schemes – developed with existing bodies such as Food for Life – to uphold and uplift standards.

We previously concluded more action was needed to increase accessibility to the public procurement tendering process for smaller, local sustainable food suppliers. Exemplar schemes such as the Dynamic Procurement Systems were highlighted as one way to increase access.

This approach is also recommended in the NFS as an important innovative method to bring SMEs and local suppliers into the arena.

The tendering process should also be made less complex and include mandatory requirements to ensure that the inclusion of smaller, sustainable suppliers is assured. This would increase competition for procurement contracts and strengthen procuring bodies’ position to demand higher quality standards rather than promoting a race to the lowest price.

Public food procurement can also be employed as a lever to influence procurement practices outside public institutions, as evidenced by increased procurement from sustainable fishing sources in the private sector following the inclusion of sustainable fish procurement standards in the GBSF.

The full potential of public procurement in the promotion of a more sustainable food system can only be fully harnessed by clear, ambitious and mandatory regulation of procurement practice.

Bold action from the Government can ensure the changes in which public money is spent on food can serve as an exemplary of how a food system that promotes healthier, more sustainable diets can work.

Key Points

- Current Government Buying Standards for Food (GBSF) are not adhered to and little is done to enforce them. They give little direction on standards of quality, and they prioritise price over quality - food can even be imported from sources that do not adhere to UK production standards. The GBSF need to be redesigned.
- Tenders should adhere to a newly developed healthy and sustainable Reference Diet. This Reference Diet should inform all food related policy and procurement decisions in the public sector, including extending beyond central government operations to encompass all public sector organisations in which taxpayers’ money is spent on the acquisition of food.
- The tendering process should also be made less complex and include mandatory requirements to ensure that the inclusion of smaller, sustainable suppliers is assured.
- Public food procurement can also be employed as a lever to influence procurement practices outside public institutions, as evidenced by increased procurement from sustainable fishing sources in the private sector following the inclusion of sustainable fish procurement standards in the GBSF.
Recommendation 14
Set clear targets and bring in legislation for long-term change

The food system problems set-out in the National Food Strategy have come about over decades and solving them will be a long-term effort. There is no silver bullet but to stay on course the National Food Strategy plan rightly says we need clearer long-term targets, ongoing political attention, and a joined-up approach not only within Government, but across the food industry and communities.

We welcome the recommendation of a strong framework of legal targets to improve the food system. The Government has already set itself a statutory target for carbon emissions. The forthcoming Environment Act will do the same for the 30x30 pledge. We agree with the National Food Strategy recommendations on primary legislation:

• The Environment Act should also include a legally binding target to halt biodiversity loss in England by 2030.
• Creating a statutory target to improve diet-related health through a Good Food Bill is long overdue.
• A harmonised and consistent food labelling system to describe the environmental impacts of food products.
• Local Authorities should be required to put in place a food strategy, developed with reference to the goals and metrics set out above, and in partnership with the communities they serve. (Over 50 places are already doing this, with impressive results).
• The 2020 Agriculture Act requires Government to review the nation’s food security at least once every three years. We agree with the NFS the Government should do this annually.

There needs to be a much stronger emphasis on the full costs of dietary ill-health to the UK including its financial burden on the NHS and on our economy. Being transparent with the measures will change both the narrative and the awareness of the negative costs of our high fat sugar salt diet. We also agree in reporting progress on these targets to Parliament. In addition, the N8 like the National Food Strategy team would like to see mandatory reporting on progress to improving the nutritional content of our foods.

We also agree with the recommendation to put a Good Food Bill including these measures before Parliament in the fourth session of the 2019–2024 Parliament. We would also recommend a number of further measures to create long-term change on UK food policy...

Our suggested measures to create long-term change

1. First, we recommend the implementation of cross-government governance structures, which tackle the system traps in the food system. Even though the responsibility for food lies with Defra, there are a significant number of government departments who could work with Defra in tackling these challenges including the Department of Health and Social Care, BEIS, Department of International Trade, Department of Transport, Department of Work and Pensions, Department for Education just to name a few.

2. We recommend the set-up of a cross government committee working together in a joined up approach to tackle these issues in the food system. At N8 we propose this type of committee should be set-up as a matter of urgency to discuss the implications of this independent review but also to discuss other important insights such as the report from the Trade and Agriculture Commission which provides important findings to inform joined-up policies for UK food, farming and trade.

3. Third, we would also like to recommend new transformative governance at the local/regional level by the setting-up of Food Systems Councils to give a voice to citizens and key organisations who work across the food system from farm to shoppers.

4. Fourth, we would also recommend strong international collaboration to share best practice on system traps that are shared across geographical boundaries. A strong partnership between DIT, Defra and FCDO and partner governments is required here.