

Consultation:

Health and Harmony: the future for food, farming and the environment in a Green Brexit

Which? is the largest consumer organisation in the UK with more than 1.7 million members and supporters. We operate as an independent, a-political, social enterprise working for all consumers and funded solely by our commercial ventures. We receive no government money, public donations, or other fundraising income. Which?'s mission is to make individuals as powerful as the organisations they have to deal with in their daily lives, by empowering them to make informed decisions and by campaigning to make people's lives fairer, simpler and safer.

Summary

Which? welcomes the publication of DEFRA's "Health and Harmony: the future for food, farming and the environment in a Green Brexit" White Paper and the opportunity for fundamental reform of food and farming policy. Leaving the EU presents an opportunity for a joined up approach that ensures farmers and food producers are delivering more effectively for consumers and therefore can rely on their confidence.

The approach within the White Paper, particularly a focus on high standards and excellence and a transition to an approach based on public money for public goods, is a significant step forward. Despite the title, however, the White Paper has two major weaknesses:

- The White Paper does not deal with how farming and food production relate to consumer health and meet consumers' wider needs and expectations.
- The scope of the White Paper is largely limited to farming and agriculture, despite making reference to some broader food chain initiatives. This means that the opportunity for a truly joined up food and farming policy risks being missed.

The opportunity for a new and more sustainable approach to food and farming policy in the broadest sense must be taken. The goal must be a truly joined up food and farming policy with a much stronger focus on the end consumer. DEFRA and the many other government departments with an interest in food must work together to ensure a joined up and coherent approach. This should include ensuring that health, food safety, quality and wider consumer acceptability are explicitly considered and integrated as "public goods" to be incentivised through future policy. Consumer interests also need to be central to the drive for greater use of technology and innovation within the sector.

Which? has a considerable body of consumer research that we can contribute to taking this forward. We look forward to working with DEFRA and the wider sector to ensure that the improvement and promotion of health, safety and quality and wider consumer acceptability are incentivised within a much more coherent policy framework.

Introduction

Which? welcomes the opportunity to submit comments on the “Health and Harmony” White Paper and to contribute to the Government’s vision for future food and farming policy. The UK has an opportunity to make sure that as we exit the EU, agriculture policy can be much more aligned with the issues that matter most to the consumers whose confidence farmers and the wider food industry are ultimately dependent on. Our response focuses on the consultation questions that are of most relevance to Which? and consumers.

A joined up approach

The White Paper sets out many ambitions for farming in the future, including a vision of a more dynamic and self-reliant agriculture industry and for incentives that will encourage methods of farming that “create new habitats for wildlife, increase biodiversity, reduce flood risk, better mitigate climate change and improve air quality”. The White Paper also puts a strong emphasis on improving animal and plant health and animal welfare.

The Paper, however, fails to give sufficient attention to what we consider to be the primary purpose of farming and food production which is to provide consumers with safe, healthy food of the quality that they expect. This essential aspect of future food and farming policy needs to be central to the Government’s approach. There must be a truly joined up food and farming policy – that incorporates agriculture, but also other aspects of the food supply chain – ensuring that there are common objectives, and therefore incentives, established across the whole of government.

At the moment, food and farming policy is too fragmented. This has been the case for decades. Different government departments deal with different aspects of food policy – including DEFRA, but also the Department for Business, Energy and Industrial Strategy (BEIS), the Department for International Trade (DIT), the Department for Health and Social Care (DHSC), the Food Standards Agency (FSA), the Department for Education and the Ministry of Housing, Communities and Local Government. Alongside this White Paper, several other strategies are also looking at over-lapping aspects of food policy, including the Industrial Strategy, Childhood Obesity Plan, the FSA’s Regulating our Future proposals and the forthcoming Bioeconomy Strategy and Clean Growth Plan.

This is in stark contrast to how consumers interact with food. People choose food products in the supermarket or when eating out and expect them to address a broad range of needs and desires. This includes, for example, taste, safety, nutritional quality, environmental and ethical standards and affordability, depending on the price and circumstances.

We welcome the publication of the White Paper as a starting point to re-consider this approach and set out how there can be a common approach across Government and the diverse food sector. To be successful, sustainable and ultimately ensure that food production

is aligned with market expectations, the proposed approach needs to more explicitly consider and serve consumers interests.

High standards and excellence

We agree that fundamental to a new approach is a focus on high standards and on excellence. A so-called “race to the bottom” in terms of standards would be detrimental to both producer and consumer interests. Maintaining and competing based on high standards is therefore essential for the domestic market and is also what our consumer research shows that people expect.

Which? has carried out extensive consumer research to understand consumers’ attitudes to food standards and also to UK-produced food more specifically. A Which? food system challenges dialogue¹ conducted jointly with Sir Mark Walport in his role as Chief Scientific Adviser and the Government Office for Science (GOS), for example, explored consumer attitudes towards food security, sustainability and health challenges facing the food supply chain, as well as the role that different technologies can play in addressing them. This highlighted that consumers are open to innovation, but expect minimum levels of safety and quality to be assured, to be involved in decisions about what is acceptable and for there to be strong independent oversight.

More recent research conducted by Which? focusing on Brexit and food standards, using an on-line community², also found that people expect there to be high standards in place and that they associate UK-produced food with high safety, quality and welfare standards. People do not expect there to be any lowering of standards after the UK leaves the EU and, if anything, expect and want standards to be enhanced. This also includes animal welfare standards.

These findings have been reinforced by Which?’s Brexit consumer tracker³. The tracker is carried out through Populus and surveys over 2000 UK adults, the results of which are then weighted to be demographically representative of the UK population. In January 2018 this tracker asked a range of questions relating to food production and standards. This found that 93% of people think it is important that existing food standards are maintained. Ninety three per cent also think it is important that food safety and standards are overseen by an independent body that is focused on consumer interests. With such strong indications from consumers over what they expect from the products they buy, it is important that the Government ensures this White Paper and its wider policy delivers on their expectations.

The Which? tracker also highlighted strong support amongst the UK population for buying food produced in the UK: 81% of people said it was important to buy UK-produced milk; 78% in the case of dairy products; 77% for poultry and 72% for red meat and meat products. The reasons why people want to support UK producers varies to a certain extent depending on the

¹ <https://www.gov.uk/government/publications/food-system-challenges-public-dialogue>

² Which?, in conjunction with Populus, created an online community of 21 members of the public from across the UK between 20th November to 29th November 2017.

³ Which? Brexit Consumer Tracker January 2018: Populus surveyed 2017 UK adults online between 17th-18th January 2018. Data were weighted to be demographically representative of the UK population.

product, but include aspects such as supporting UK producers, taste, safety and welfare standards.

The Government also has an opportunity to make it easier for people to act on this and to choose products based on their origin through wider adoption of country of origin labelling. This includes improving the information provided to people when eating out of home and ensuring that people are not misled about the origin or standards of food that they buy.

A successful future for farming

Which? supports the Government's intention to move away from direct payments which have focused on supporting farmers without wider consideration of how consumer and societal benefits can be incentivised, while potentially adding costs for consumers.

It is important that the focus on improving competitiveness is aligned with consumer attitudes and expectations regarding food production methods. Consumer confidence and acceptability will be key to ensuring that there is a strong domestic market – as well as a high level of confidence in UK exports.

Technology has an important role to play in a future food and farming policy. It is however essential that innovation is focused on delivering benefits for consumers and that it is developed in line with their expectations. If new and innovative production methods are to fulfil their potential they have to be acceptable to consumers so that they will ultimately choose to buy them. If this is not recognised from the outset, a great deal of effort may be for little gain and risk the loss of consumer confidence.

An important way to show that this is understood and that the end consumer is crucial for commercial success is to broaden the scope of the Industrial Strategy and the Food and Drink Sector Council that is shaping how it applies to the sector so that they both consider consumer interests more explicitly.

The current list of research priorities set out in the White Paper also needs to be broadened.

The issues that are proposed are as follows:

- a) Plant and animal breeding and genetics
- b) Crop and livestock health and animal welfare
- c) Data driven smart and precision agriculture
- d) Managing resources sustainably, including agro-chemicals
- e) Improving environmental performance, including soil health; and
- f) Safety and trust in the supply chain.

These are all important areas for research and recognise some of the wider systemic challenges facing the food system that will impact on UK's food production and security. There does however need to be a much more explicit emphasis on understanding how food and farming policy can deliver more effectively for public health, including in terms of nutrition.

Safety and trust in the supply chain should also be considered as an over-arching objective that applies to all of the other research areas. It is essential that understanding of consumer attitudes and acceptability, through consumer engagement, underpins the future approach.

As well as asking “how can industry and government put farmers in the driving seat to ensure that agricultural R&D delivers what they need?” it is also important that industry, government and farmers consider what consumers will ultimately need and expect.

When Which? conducted the food system challenges dialogue with the Government Office for Science in 2015, we looked in detail at what will determine consumer acceptability. This found that consumers are open to technology, but key considerations include the extent to which it will benefit the public, the level of independent oversight and whether all options have been fully considered.

Public money for public goods

We support the proposal to shift to an approach based on public money for public goods. The White Paper currently proposes public goods in five areas: environmental enhancement and protection (improved soil health, improved water quality, better air quality, increased biodiversity, climate change mitigation and enhanced beauty, heritage and engagement with the natural environment); better animal and plant health and animal welfare (world class animal welfare, high animal health standards and protection of crops, tree, plant and bee health); improved productivity and competitiveness; preserving resilience and traditional farming and landscapes in the uplands and public access to the countryside.

These are all important issues, but health and wider consumer confidence also need to be included within these “goods”. Obesity and diet-related diseases, such as cancers, heart disease, diabetes and stroke, are for example one of the most fundamental challenges facing the UK’s food system, but are not addressed within the White Paper.

Many people currently struggle to eat the recommended diet, eating too much fat, sugar and salt and not enough fruit and vegetables. This contributes to the high incidence of diet-related diseases such as cancers, heart disease and stroke. Sixty three per cent of adults and 28% of children aged 2-15 in the UK are now overweight or obese. Obesity doubles the risk of dying prematurely and obese adults are seven times more likely to develop type 2 diabetes⁴. Overweight and obesity are also the UK’s biggest cause of cancer after smoking. It was estimated that the NHS in England spent £5.1 billion on overweight and obesity-related ill-health in 2014/15. The CAP has successively failed to link farming policy to issues of diet and health and there is now the opportunity to address this and align incentives.

Along with unhealthy diets, there is also an opportunity to re-design policy that incentivises high standards of food safety and quality, along with animal and plant health and animal welfare. The FSA estimates that there are 1 million cases a year of foodborne illness a year and 7,500 hospitalisations⁵. *Campylobacter* is the most common foodborne pathogen, with about 115,000 cases every year, most of which are linked to contaminated poultry. The

⁴ Childhood Obesity: A Plan for Action, UK Government, 2016

⁵ Annual Report and Consolidated Accounts 2016/17, Food Standards Agency

estimated economic cost of foodborne illness is around £1 billion per year. The horsemeat scare of 2013 was not a direct food safety issue, but served to highlight the complexity of food supply chains and challenges of ensuring traceability and integrity.

Food safety and quality therefore also need to be at the heart of public goods. The poultry sector is a good illustration of how integrated food supply chains can be from 'farm to fork'. The FSA has focused on an industry target to reduce the incidence of chickens that had the highest levels of contamination with *Campylobacter*. This led to a focused approach across retailers and producers to address the multiple stages along the supply chain that could contribute to *Campylobacter* levels – from on-farm controls through to slaughter, processing and retail level. The focus in the White Paper on tackling endemic disease and driving up animal health standards, in the form of an animal health pathway, is an important part of this and should go further.

The challenge of antimicrobial resistance also requires action across the food supply chain – and needs to be an issue that is acknowledged within the policy. This includes a greater focus on animal and plant health to reduce reliance on antimicrobials.

The definition of public goods also needs to recognise the essential role that consumer acceptability plays in food purchases and choice. The horsemeat scare had a significant impact on trust and confidence because, apart from being a misleading and cheaper substitution, people do not eat horse meat in the UK. Certain food production methods will also raise particular concerns for consumers – and will mean that there is going to be a limited market for products that are produced using them as this will contradict consumers' desire for high standards. This is an important issue as the UK develops its future trade policy, where some countries operate to different and, for many UK consumers, unacceptable standards.

The Which? Brexit consumer tracker (January 2018) found for example that for UK consumers:

- 80% of people would not feel comfortable eating beef if growth hormones were used in production;
- 79% would not feel comfortable consuming milk if growth hormones were used to increase milk yields in dairy cattle;
- 70% do not feel comfortable eating food if cloning had been used in its production;
- 72% do not feel comfortable eating chicken which has had chlorine carcass treatment; and
- 64% say that they would not feel comfortable eating food with greater use of GM ingredients

These findings reflect Which?'s deliberative food dialogues with groups of consumers and highlight the need to engage consumers in decisions about future food and farming practices. They need to be taken into account when shaping and developing an approach to incentivise the proposed public good of "improved productivity and competitiveness". As set out above, many consumers want to support UK producers – and this is because of the perceptions of high UK standards. This confidence is easily lost if people consider that the practices that are used are no longer acceptable.

The White Paper therefore needs to take a more consumer and health-focused approach to public goods and work with a broader range of stakeholders in developing and integrating appropriate policy tools that can build them into future food and farming practice.

Which?'s consumer research shows that consumers are strong supporters of UK-produced food – but based on current belief that UK food is produced to high standards of safety, quality and welfare. People largely expect that these standards will be enhanced rather than lowered going forwards. This is central to future consumer confidence and must be recognised across Government.

Fulfilling our responsibility to animals

We agree that there is a case for government funding pilots and other schemes which incentivise and deliver improved welfare, as part of the wider approach to “public goods” set out above. This includes looking at how animal health, welfare and public health benefits can be joined-up and incentivised.

Our consumer research has reinforced that consumers think that high animal welfare standards are important – and that they assume and expect that the UK is a world leader in this respect. We agree that opportunities should be taken to go further where this is beneficial. Consumer engagement will be important in understanding some of the potential trade-offs, including any implications for food prices.

The Government should use a broad mix of tools to incentivise these public goods – animal welfare and wider. These should include the range of options proposed in the consultation question – including regulation, but also looking at the role financial incentives to support action. Improved transparency across supply chains is also important – including for consumers, so that they understand any differences in standards and what they are choosing to pay for.

Changing regulatory culture

The White Paper focuses on how inspections could be improved for environmental, animal health and welfare standards. From a consumer perspective, our research has repeatedly found that consumers expect there to be robust, independent oversight in place. It is important to ensure that any inspection regime is not overly burdensome – but the focus should be on ensuring compliance and therefore trust in the system and UK standards.

The lessons of various food scares, most notably the BSE and horsemeat scares, as well as more recent failings in meat plants, must also be taken into account in determining the future approach. The system should always be risk-based, but also recognise and understand the many factors that can lead to risk changing. The DEFRA commissioned Elliott report following the horsemeat scare, for example, highlighted how financial pressures on supply chains can lead to corners being cut and create incentives for food fraud and crime.

Consumers have benefited from a “farm to fork” approach to food safety that recognises the importance of effective controls, whether for food safety or wider integrity, at every stage of the food chain. On-farm controls are a crucial link in this chain.



Conclusion

We welcome the White Paper as the starting point for a conversation about future food and farming policy. The White Paper has put a lot of focus on some important societal 'goods' that future food and farming policy should deliver. There are however, some fundamental gaps. The conversation therefore now needs to be widened, ensuring that consumer interests are also central to the approach going forward.

Which? looks forward to working with DEFRA and the wider sector to ensure that the improvement and promotion of health, safety and quality and wider consumer acceptability are incentivised within a much more coherent policy framework.

Which?
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