

National Food Strategy - Call for Evidence

Consumer expectations

The Strategy provides an important opportunity for a coherent approach across government to tackle the many challenges facing the food system and consumers, from obesity to climate change. People must have access to healthy, safe, sustainable and affordable food and be in a position to make informed choices.

Which?'s research shows that people expect the UK to maintain and ideally enhance food standards after Brexit¹. Many worry about food prices², but expect standards will be maintained for safety, quality and welfare. People want to support UK producers, particularly for meat and dairy products. Most think that farmers should be supported by government, but that support should lead to animal welfare, food safety, animal health and other improvements.

People feel generally well informed about healthy eating, but struggle to put this into practice. They are less informed about wider sustainability. They support improvements to labelling, particularly for ethical, environmental or animal welfare. Simplified information, such as traffic light labelling, is supported.

Government leadership is expected to drive sustainable business practices. Our research shows support for actions to improve the products on offer and their marketing. This includes addressing the unhealthy balance of price promotions and driving product reformulation (eg. lower fat, sugar and salt)³.

People also have strong views about production methods. They are uncomfortable about antimicrobial and hormone growth promoters and end-process carcass treatments permitted in other countries but not the UK, even if labelled, whatever their income level.

¹ Which? has a large body of consumer research that we would be happy to share with the team. Some of our initial findings on food standards are summarised here, but we conduct regular surveys to update this research and look at wider issues: <https://consumerinsight.which.co.uk/articles/brexitandfood>

² <https://consumerinsight.which.co.uk/tracker/worry>

³ Which? Healthy Food Choices Survey, 2018. Research Now, on behalf of Which?, interviewed 1003 adults residing in the UK online, between 12th and 17th January 2018. Data were weighted to be representative of the UK population.

Against this backdrop, we have structured our evidence under 8 themes.

1. For the long-term

The Strategy should embed a joined-up approach and objectives across government departments. Legislation and institutional mechanisms are needed. A Bill should set out common objectives that Ministers will be required to report againstⁱ. A Food Councilⁱⁱ should monitor implementation and a Ministerial Sub-Committee should ensure cross-governmental working.

2. Start with what we eat

The disconnect between what we need and want to eat, and what and how we produce and market food, needs to be addressed. This starts with official advice about what to eat for a healthy and sustainable diet. This is important for the core indicators that should shape policy interventions and business practicesⁱⁱⁱ. An honest assessment is needed of the strengths and weaknesses of the UK food system and shifts required, supported by on-going consumer engagement to ensure acceptability and address wider cultural and societal considerations.

3. Imported and domestic

Food standards must not be lowered to reach trade deals with countries that have lower food standards. The UK must avoid a two tier system that undermines progress made by UK industry. The Strategy must set out criteria for trade in food that will enable the UK's food system to be healthy, sustainable, resilient and address consumer acceptability^{iv}. This must be explicit about the potential risks, eg. food safety, the viability of domestic production and consumer choice and the environmental impact of imports from other countries.

4. Informing behaviour

Labelling and information alone have a limited effect on choices, but can inform decisions and drive business behaviour (eg. product reformulation). Which? research has found that labelling and claims can be confusing and mislead. A review of current schemes is needed so consumers can make informed choices about what is healthy and sustainable. Consumers support mandatory traffic light nutrition labelling. Allergen labelling improvements need to be applied. There should be a scheme to help choices based on broader sustainability issues^v. Labelling about recycling needs to be more consistent.⁴ Welfare and country of origin labelling should also be improved⁵. Food advertising controls, particularly to children (eg digital and TV advertising) need strengthening so that government advice is not undermined. Labelling must also work when buying online.

⁴ What are supermarkets doing to wrap up the plastic problem", Which? magazine, July 2019.

⁵ The truth about supermarket chicken, Which? magazine, May 2019.

5. Aligning incentives

Incentives across policy areas need to be aligned – from agricultural support to research agendas and food marketing controls: a plough to plate approach for a healthy and sustainable food system^{vi}. Contradictions need to be confronted eg. the sale and promotion of unhealthy foods in hospitals and other health care settings; limited access to healthy choices, but excessive unhealthy fast food outlets in deprived areas; the continued link between unhealthy foods and sports sponsorship; and how agriculture support is disconnected from health needs.

6. Responsible innovation

Consumer views need to be taken into account as part of research agendas so that food production methods are publicly acceptable. Innovation needs to be looked at in a broad sense. Technologies have an important role, but an open debate is needed about the range of solutions to address specific challenges facing the UK system and how good practice can be promoted^{vii}. Conflict-free, independent scientific and expert advice also needs to be maintained. The regulatory framework needs to take account of new models of delivery and supply chain relationships eg. online marketplaces and platforms. The precautionary principle must be a key element of future policy.

7. Transparent supply chains

Transparency and traceability is needed across the food system. This includes price distribution across supply chains to better understand what shapes the price that consumers pay and how this is shared. Government has a role monitoring this. Transparency also extends to pricing practices (eg. our monitoring has found most supermarket promotions are on less healthy products and that these offers can be misleading). A better understanding is needed of how ingredients are used across supply chains and vulnerabilities, as the horsemeat scare illustrated^{viii}. Collection and publication of data on food chain practices can incentivise improvements (eg. reductions seen with *Campylobacter* in chicken), The display of food hygiene ratings should be mandatory in England for businesses and platforms. Making it mandatory in Wales drove hygiene improvements and reduced foodborne illness.

8. Independent oversight

The Food Standards Agency (FSA) was set up as a regulator with an unambiguous duty to protect public health and other consumer interests in relation to food. The FSA must have access to sufficient independent expertise and be informed by public attitudes. A world class food enforcement system is needed that ensures consumers, but also other trading partners, can have confidence in the safety and quality of UK food as well as imports⁶. Strategic use of resources and skills is needed so that consumers are protected wherever they live in and whether buying from a local shop or an online platform^{ix}.

⁶ <https://www.which.co.uk/policy/consumers/3851/ukenforcementsystems>; <https://www.which.co.uk/policy/food/931/ensuring-consumer-focused-food-law-enforcement>

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ⁱ The Scottish Government's Good Food Nation Bill is an example of an attempt to do this. The Bill would place requirements on Ministers to make a statement on food policy as well as set out indicators for success. Relevant public bodies would also have to do this and there would be a requirement on Ministers and on public bodies to collaborate and ensure a joined up approach. The National Food Strategy should build on this, establishing key cross-governmental principles and indicators which are required to be reported against in legislation.

ⁱⁱ In establishing a Council, models in other countries should be drawn upon, for example, the Canadian Food Policy Advisory Council, as well as those that exist in the UK in other areas eg. the Committee on Climate Change.

ⁱⁱⁱ This was a key conclusion from the Which? and Government Office for Science (GOS) food system challenges dialogue (<https://www.which.co.uk/documents/pdf/food-system-challenges---public-dialogue-on-food-system-challenges-and-possible-solutions-445299.pdf>) which found that once people had become aware of the issues, including the environmental impact of their choices, they found it difficult to know how to act on this. They wanted clearer and more informative labelling and action from the food industry and government to make it easier to make more sustainable choices. Which?'s previous assessments of labelling schemes have, however, found that they can be limited in terms of addressing the breadth of sustainability issues, as well as enabling healthier choices. While efforts were made to try and develop clearer advice and more consistent labelling several years ago, there has been limited progress.

^{iv} Which?'s consumer research, including our most recent survey representative of the population conducted in July 2018, has found that the majority of people find certain practices which are permitted in some countries, but not in the UK to be unacceptable. This changes little when labelling is proposed and people also have concerns about how they would make informed choices when eating out if these practices were permitted. Around 8 in 10 people feel uncomfortable about eating food produced using antibiotic growth promoters (78%), growth hormones used in beef production (79%) or growth hormones used to increase the milk yields of dairy cattle (77%). 74% are uncomfortable about eating food produced using cloned animals, 72% for chlorine carcass treatments used in chicken production and 65% in the case of greater use of genetically modified (GM) ingredients in foods.

^v A recent Which? survey (October 2018) asking people about adequacy of current food labelling found that while 67% of people thought that there was about the right level of information on food labels; 20% thought that there was too little information. A "traffic light system extended to environmental, sustainability and fairtrade issues" was one gap people who thought there was too little information suggested as an improvement. A separate survey conducted in December 2018 asked about front of pack nutrition labelling and found that awareness of the traffic light scheme is high (89%), and the same proportion think the scheme is helpful (89%). The colour coding is the aspect the largest proportion of consumers find helpful (91%), and over half finding this very helpful (56%). A majority also think the amount of nutrient per portion (87%) is helpful. Colour coding is also the aspect the largest proportion of consumers think is important (89%), with over half thinking this is very important (52%).

^{vi} There is a risk that the opportunity to align agriculture support with wider incentives to improve public health will be missed as part of the proposed reforms in the Agriculture Bill. As well as incentivising environmental and landscape improvements, farm subsidies should also be used to incentivise issues such as improved food safety, production in line with dietary goals and reduced use of antibiotics. Support for improving productivity must also ensure consumer acceptability of the methods used. A Which? survey, representative of the population, conducted in September 2018 found that the majority of people (69%) support subsidies to farmers. But only 13% thought that farmers should be supported regardless. The top 3 priorities most people selected for subsidies were high standards of animal welfare, producing safe food and higher animal health standards.

^{vii} The Which? and GOS food system challenges dialogue referred to above found that there are a range of factors that will influence the acceptability of innovation in the food system as set out in the diagram below. Recent initiatives, including those through the Industrial Strategy Challenge Fund have often failed to give sufficient attention to consumer perspectives in deciding priorities, as well as conducting research. Regulation of innovations can often be seen as a barrier to market access, whereas our research shows that independent oversight is key to consumer acceptability and confidence. A robust regulatory regime with independent pre-market assessment and approval, taking account of science, as well as other social and ethical factors, is therefore essential.

What are the risks?

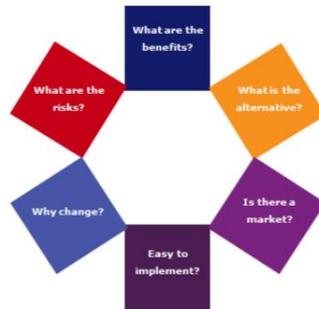
Is it safe? Will the solution exacerbate other challenges e.g. biodiversity, waste?

Why make the change?

Is the solution for the public good or motivated by profit; does it seek to maintain the status quo or drive necessary change?

How easy to implement?

How far from market; who will pay to implement / promote change?



What are the benefits?

If / how it addresses priority challenges?

What is the alternative?

Are there other ways to address the challenge that are more *natural*?

Is there a market?

Will the public buy the product; will price (too high or too low) put people off?

^{viii} Preventing food fraud has to stay a priority, including follow up to the Elliott review into the horsemeat scare. Which? research has uncovered various types of fraud eg. lamb takeaways that contain no lamb, goats cheese that's really sheep's cheese, fake oregano and fish substituted for cheaper varieties in fish and chip shops. Food fraud can leave consumers out of pocket, but can also have emotional harm and health implications. Any increase in food prices eg. as a result of uncertainty around EU exit, could create opportunities for fraud and this will be exploited if there are weaknesses in border controls.

^{ix} Which? monitoring of FSA local authority enforcement monitoring system (LEAMS) data has repeatedly found that there can be huge variation in compliance with food hygiene standards depending on where people live in the UK. For example: How safe is the food you are eating?, Which? magazine, July 2018. As well as making more effective use of skills and resources, enforcement officers need to have appropriate tools and effective sanctions, including criminal sanctions to underpin food and feed law. Which? has been concerned about recent proposals (eg a recent FSA consultation on implementing the EU Official Controls Regulation) to replace some criminal sanctions with civil ones, which could remove a valuable deterrent.