HOUSE OF LORDS

Select Committee on Food, Poverty, Health and the Environment

Report of Session 2019–20

Hungry for change: fixing the failures in food

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Select Committee on Food, Poverty, Health and the Environment

The Select Committee on Food, Poverty, Health and the Environment was appointed by the House of Lords on 13 June 2019 to "consider the links between inequality, public health and food sustainability".

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See Appendix 1.

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Committee staff

The staff who worked on this inquiry were Beth Hooper (Clerk), Samantha Kenny (Policy Analyst) and Rebecca Pickavance (Committee Assistant)

Contact details

All correspondence should be addressed to the Select Committee on Food, Poverty, Health and the Environment, Committee Office, House of Lords, London SW1A 0PW. Telephone 020 7219 4878. Email hlfoodpoverty@parliament.uk

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Q in footnotes refers to a question in oral evidence.

SUMMARY

The UK's food system—the production, manufacture, retail and consumption of food—is failing. Food should be a source of enjoyment, good health and cultural expression, but there are stark contrasts in the way that people experience the food system in this country. For many people, food is the source of considerable anxiety. Significant numbers of people are unable to access the food they need, let alone access a healthy diet. Billions of pounds are spent each year by the National Health Service (NHS) treating significant, but avoidable, levels of diet-related obesity and non-communicable disease. Although diet-related ill health affects all sectors of the population, its effects are felt more acutely in deprived areas, and considerable health inequalities persist. The food industries, manufacturers, retailers and the food services sector, perpetuate the demand for less healthy, highly processed products. This not only impacts on public health, but also inhibits efforts to produce food in an environmentally sustainable way. The health of the population, and the health of the planet, is at risk. This report makes clear how this situation might be reversed.

The devastating impact of the COVID-19 crisis is likely to have lasting consequences for the economy and for public health. The crisis has exposed the fragility of many people's economic situation and exacerbated many of the problems relating to poverty, food insecurity and health inequalities that our inquiry examined. The crisis should serve as an urgent wake up call to the Government. People should be able to access not only enough food, but also the food that they need to stay healthy; the food system, and action in related policy areas such as health, welfare and food production, should guarantee this.

The Committee was set up to "consider the links between inequality, public health and food sustainability." We found barriers at all levels of the food system that make it harder for people, particularly those living in poverty, to access a healthy and sustainable diet. The lack of a unifying Government ambition or strategy on food has prevented interrelated issues such as hunger, health and sustainability from being considered in parallel, meaning that opportunities have been missed to develop coherent policies that could effect widespread change. Our recommendations are built around the central aim of ensuring that everyone, regardless of income, has access to a healthy and sustainable diet.

Key recommendations

The Food and Agriculture Organization of the UN estimated that around 2.2 million people in the UK are severely food insecure (i.e. with limited access to food, due to a lack of money or other resources).[1] Until recently, however, the Government has not collected data on this and so does not have an accurate picture of the prevalence of food insecurity. Without a comprehensive understanding of the scale of the problem, neither the root causes of food insecurity, nor the detrimental impact it has on public health and wellbeing can be fully evaluated or addressed. We have asked that the Government commits to detailed and routine monitoring of the levels of food insecurity. That data should be published transparently and be subject to scrutiny to ensure that

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1   Food and Agriculture Organization of the United Nations, *The State of Food Insecurity and Nutrition in the World, Building Climate Resilience for Food Security and Nutrition* (2018), p 138: http://www.fao.org/3/I9553EN/i9553en.pdf [accessed 29 June 2020]. Definition of food insecurity from FAO, IFAD, WFP and WHO, *The State of Food Security and Nutrition in the World*, (2017), p 96: http://www.fao.org/3/a-i7695e.pdf [accessed 29 June 2020]

trends in food insecurity can be linked to wider socioeconomic reforms, and can inform policy in other areas such as public health and welfare so that efforts to tackle food insecurity can be targeted effectively.

The welfare system is failing to prevent situations where people find themselves without the resources to access food. Food insecurity is a consequence of poverty. An estimated 11 million people, including around 2.8 million children, are living in poverty[2] in the UK.[3] Poverty is characterised by a lack of resources, and for many people, their food budget is the only budget that can be reduced. Although the Government has not, until recently, collected routine data on food insecurity, the existence, and rising use of food banks provides a clear indication of the severity of the problem. Food aid organisations told us that reliance on food banks is increasing. In 2019, the Trussell Trust reported that it had seen a 73% increase in the number of emergency food parcels it has delivered over the past 5 years[4]. Following the outbreak of the COVID-19 pandemic, the Trussell Trust reported an 81% increase for emergency food parcels from food banks during the last two weeks of March 2020, compared to the same period in 2019.[5] The Trussell Trust, and others, have suggested that problems with Universal Credit are one factor in the increased use of food banks.[6] Specifically, we were told that many people lack the financial resilience to cope with the five-week wait between making a claim and receiving the first payment of Universal Credit. As a result, some people struggle to afford food, with many going hungry. We are not the first to urge the Government to rethink and replace the current system of the five-week wait but we have added our support to calls to urgently address the long-standing problems with Universal Credit, problems that place people in the vulnerable situation of not being able to afford enough food. The charitable sector is shouldering this burden and although it is providing vital support, the Government should not be relying on food aid to fill the gaps in the welfare system.

People with limited resources to access food often find it hard to access healthy food. Less healthy diets and their adverse consequences are not limited to those in the lowest income groups, but affect these groups disproportionately. Adults and children in deprived areas are significantly more likely to become obese or suffer with diet-related ill health[7], a disadvantage that is contributing to widening health inequalities in this country.[8] The Government has introduced guidance on what constitutes a healthy diet through Public Health England's Eatwell Guide but it has not fully evaluated whether the diet it recommends is affordable to everyone. We were referred to a Food Foundation report which estimated that: "the poorest decile of UK households would need to spend 74%

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2   In relative low income before housing costs.

3   House of Commons Library, Poverty in the UK: statistics, Briefing Paper, Number 7096, 29 April 2020

4   The Trussell Trust, *Record 1.6m food bank parcels given to people in past year as the Trussell Trust calls for end to Universal Credit Five Week wait* (25 April 2019)*:* https://www.trusselltrust.org/2019/04/25/record-1-6m-food-bank-parcels/ [accessed 29 June 2020]

5   The Trussell Trust, *Food banks report record spike in need as coalition of anti-poverty charities call for strong lifeline to be thrown to anyone who needs it*, (1 May 2020): https://www.trusselltrust.org/2020/05/01/coalition-call/ [accessed 29 June 2020]

6   Q 37 (Garry Lemon)

7   House of Commons Library, Obesity Statistics, Briefing Paper Number 3336, 20 March 2018

8   Institute of Health Equity, *Health Equity in England: The Marmot Review 10 year on* (February 2020) p 84: https://www.health.org.uk/sites/default/files/upload/publications/2020/Health%20Equity%20in%20England_The%20Marmot%20Review%2010%20Years%20On_full%20report.pdf [accessed 30 June 2020]

of their after-housing disposable income on food to meet the cost of the Eatwell Guide compared to just 6% in the richest decile."[9] The Government should know whether or not people can afford to adhere to its own dietary guidance. We have therefore recommended that a fuller understanding of the cost of a healthy diet should be reached, and factored into the calculation of benefit rates. This cost should also act as a reference point to inform other policy interventions, including those relating to welfare and public food provision.

Highly processed foods—those that contain high levels of energy, unhealthy types of fat, salt or highly refined carbohydrates such as sugar[10]—are produced in abundance in this country. These products are then aggressively marketed and promoted to the consumer. Highly processed food products are also more likely to be on promotion, making them appealing to those on a tight budget.[11] Manufacturing, retail and the food service sector, has a central role in this. As a consequence, a high proportion of both adults and children's dietary energy comes from processed food[12] with the UK consuming more processed products than any other European country.[13] The less healthy choice has become the easier, cheaper choice for the consumer but this is inflicting profound costs on public health and the NHS.

The Government is fully aware of the need to reduce the prevalence and consumption of less healthy food and has, to date, introduced a range of policies and proposals aimed at improving the food environment, including numerous measures outlined in the three chapters of the Childhood Obesity Plan. Despite this, obesity rates continue to rise.[14] There is no excuse for the Government not to re-double its efforts in these areas. Many Government proposals to impose restrictions on the marketing, advertising and price promotion of less healthy foods have so far failed to progress beyond consultation stage. We have urged the Government to publish the results of these consultations so that policies can finally be developed and enacted to conclusively tackle the factors in the food environment that make the less healthy choice so readily available.

We also have recommended that the Government step up its efforts to encourage the food industry to reformulate its products to reduce harmful levels of salt, sugar and unhealthy types of fats. Both the salt and sugar reduction programmes are likely to fail to achieve their stated targets so the Government must increase and maintain the pressure on industry to act. Industry progress against voluntary reformulation targets should be subject to transparent and regular monitoring, to highlight where successes and failures occur. Crucially, the Government should make clear what regulatory action will follow if the industry does not respond comprehensively and swiftly to voluntary targets. Mandatory (fiscal) approaches can work, as evidenced by the Soft Drinks Industry Levy. As there is a proven mechanism for delivering successful reductions in ingredients that may be associated with poor health outcomes in a way which has not had a

9   Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073)
10   And low levels of fruits, vegetables, whole grains, nuts or seeds
11   Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073)
12   *Ibid*
13   Written evidence from the University of Southampton and the MRC Life Course Epidemiology Unit Southampton General Hospital (ZFP0080)
14   NHS Digital, *Statistics on Obesity, Physical Activity and Diet, England, 2020* (5 May 2020): https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-obesity-physical-activity-and-diet/england-2020/part-3-adult-obesity-copy [accessed 30 June 2020]

detrimental impact on the industry, the Government must not delay in exploring the application of fiscal measures (such as further levies or changes to VAT) to other product categories where reformulation is not in line with Government targets. Food manufacturers and retailers have been reluctant and slow to act, but Government regulation can and must compel them to do so now.

In all sectors of society, a shift in consumption is required. Clear public health messaging is an important start, but the extension and reform of three public food measures—Healthy Start vouchers, free school meals and holiday hunger programmes—is absolutely necessary too. If properly funded, properly implemented, and extended to all who need them, these programmes could help to prevent the poorest children from going hungry and could enable a shift in consumption that would make a healthy diet more accessible for children and families. Combined with a renewed and more targeted effort to communicate public health messages, these programmes could help make healthy food an easier and more accessible choice. Schools and local authorities have an important role in increasing knowledge and skills on nutrition, and supporting people to make healthier choices, but the Government must ensure that they are adequately resourced to do so.

Current patterns of consumption are not only impacting adversely on the population's health, but also on the environment. Our evidence indicated that economic forces, including the demands of supermarkets, food manufacturers, the food services sector, and the large food commodity companies, requiring farmers to produce food as cheaply as possible can act as an inhibitor to producing food in an environmentally sustainable way. This can increase the negative impacts of agriculture on the natural environment, threatening biodiversity and the quality of farmland. Future agricultural policy should aim to balance food production with the protection of health and the environment. We welcome the general direction of the Agriculture Bill, but we have highlighted where we think there are limitations in its proposals that must be addressed. The Bill proposes to reward farmers for producing environmental benefits, but we have warned that without a consistent, reliable system for determining, measuring and reporting these impacts, the Bill will not fulfil its potential. We have therefore recommended that every public good outlined in the Agriculture Bill is accompanied by a standardised framework to allow measurements and targets to be clear, consistent and easy to use. Farmers should be supported to achieve the public goods outlined in the Bill, and financial rewards should be conditional upon action and progress.

The Agriculture Bill must also help to support wider improvements to public health. There are convincing arguments for a fundamental shift in consumption towards a more plant-based, balanced diet: current patterns not only have an adverse impact on the population's health, but also on the environment. The Government must clarify the vision for a healthy, sustainable diet, and set out a clear path towards achieving this. We have recommended that the Agriculture Bill should recognise, support and reward farmers for measures that promote improved public health.

In addition, if trade agreements allow for the import of cheap food, produced according to lower environmental and animal welfare standards, this could put UK producers, and even consumers' health, at a disadvantage. In a joint letter to MPs and Peers, dated June 5 2020, the Secretary of State for International Trade, the Rt. Hon. Elizabeth Truss MP, and Secretary of State for the Department for

Environment, Food and Rural Affairs, the Rt. Hon. George Eustice MP, stated that in all of its trade negotiations, the Government "will not compromise on our high environmental protection, animal welfare and food standards."[15] We have called on the Government to stand by this commitment and set out what safeguards it will provide.

Substantive change is required throughout the whole food system—from plough to plate—to ensure that everyone has access to a healthy, sustainable diet. Rising levels of obesity, food insecurity and health inequalities, and the damage caused to the environment by the current system of food production demonstrates that further action is needed now. In light of these persistent problems many of our witnesses advocated for 'whole system change'. In this report we have identified the points in the food system where changes can and should be made. We have made recommendations that aim to address issues relating to: people's ability to access food and the impact on diet of living in poverty; the efficacy of existing Government food programmes; the factors that influence consumer behaviour; the availability of less healthy foods; and food production and the natural environment. We are clear, however, that to ensure long-term, sustainable progress can be realised, a clear, overarching vision for what the food system should achieve is also required, underpinned by robust governance and accountability. The Government's National Food Strategy is a positive and universally welcomed step in the right direction. The Government has committed to publishing a White Paper in response to the forthcoming recommendations of the National Food Strategy review, led by Henry Dimbleby. These recommendations are likely to require cross-departmental co-ordination and a dedicated system of oversight to bring about a tangible change to the way we produce, purchase and consume food. We have, therefore, recommended the establishment of an independent body, responsible for strategic oversight of the implementation of the National Food Strategy. This independent body should have the power to advise the Government and report to Parliament on progress.

At a time of crisis, when Government spending has necessarily and dramatically risen in response to the impact of the COVID-19 outbreak, we were conscious of the difficulty of making recommendations which require further demands on the public purse. With this in mind, we have been selective. The recommendations we have made would, if implemented, reduce the many burdens that poor diets place upon the environment, the NHS, and the wider economy.

Food policy has an impact on all sectors of our economy, environment, and society, and the ability to access a healthy diet has a profound impact on people's health and wellbeing. Before the COVID-19 pandemic, the burden placed on the environment, economy and the NHS by the nation's diet was already unsustainable. The unacceptable inequality in people's ability to access healthy food also predates the current crisis. The COVID-19 outbreak has pushed more people into economic difficulty, and has had, and will continue to have, a serious negative impact on the nation's health and economy, an impact that is being felt more acutely by those in deprived areas. It is now, therefore, more important than ever to ensure that everyone can access a healthy, sustainable diet. Jo Churchill MP, the Minister for Prevention, Public Health and Primary

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15   Letter to MPs and Peers from the Rt. Hon. Elizabeth Truss MP, and Secretary of State for the Department for Environment, Food and Rural Affairs, the Rt. Hon. George Eustice MP, 5 June 2020. Letter referred to by Lord Gardiner of Kimble, Parliamentary Under-Secretary of State, Department for Environment, Food and Rural Affairs, HL Deb, 10 June 2020, cols 1753-1754 .

Care at the Department for Health and Social Care, appeared to share that view, and told us:

> "We have a teachable moment, and we should seize it."[16]

The COVID-19 pandemic has reinforced the need, and provided the opportunity, for the Government to act now with commitment and focus to deliver the improvements to the food system, public health and environmental sustainability that are so urgently required.

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16   Q 123 (Jo Churchill MP)

Hungry for change: fixing the failures in food

CHAPTER 1: INTRODUCTION

1. The future configuration, resilience and efficiency of the UK food system is vital for the economy and the health of the nation. Yet, while the agri-food sector as a whole contributes around £121 billion to the UK economy each year[17], ill health resulting from poor diets is costing the NHS around £6.1 billion per year and £27 billion to the wider economy.[18] The UK farming sector provides important public goods, yet UK agriculture also accounts for over 10% of the UK's greenhouse gas emissions[19], and around 10 million tonnes of food leaving farms is wasted each year.[20] A food system that is better for public health and the environment must be created but it will require Government intervention.

2. The term food system is difficult to define. It can be understood as simply describing the 'food chain', from farm to fork and comprising agriculture, food production and manufacturing, retail (sale and purchasing of food) and consumer behaviours. There are, however, other important elements that shape food production and consumption, including marketing, regulation and policy. Finally, there are the factors that affect access to that food: price, personal income and circumstances, and even geographical location. We were conscious that the term 'food system' is somewhat ambiguous so for the purposes of this inquiry our report has focused on what we produce and how it is produced, and what influences people's choices and ability to access food.

3. We were told two key things about the food system. First, it is a significant and essential part of the economy and, as such, it could be a powerful lever to improve public health. Second it is failing—failing to deliver for public health, for social equalities and for the environment—it is, at present, 'unsustainable'. This failure most clearly manifests itself in three key issues: the two seemingly contradictory problems of growing obesity rates, and rising food insecurity; and the damage that is sustained to the environment by the current system of food production.

4. Our witnesses described a food system that is biased towards providing an overabundance of cheap, less healthy food, with adverse consequences for

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17 Department for Environment, Food and Rural Affairs, *National Statistics: Food Statistics in your pocket Summary'* (updated 30 March) : https://www.gov.uk/government/publications/food-statistics-pocketbook/food-statistics-in-your-pocket-summary#gross-value-added-of-the-uk-agri-food-sector-2018 [accessed 30 June 2020]

18 Public Health England, 'Health Matters: obesity and the food environment', (31 March 2017): https://www.gov.uk/government/publications/health-matters-obesity-and-the-food-environment/health-matters-obesity-and-the-food-environment--2 [accessed 30 June 2020]

19 Department for Business, Energy and Industrial Strategy, *2018 UK Greenhouse Gas Emissions, Final Figures* (4 February 2020) p 12: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/862887/2018_Final_greenhouse_gas_emissions_statistical_release.pdf [accessed 30 June 2020]

20 Committee on Climate Change, *Net Zero The UK's contribution to stopping global warming* (2 May 2019) p 188: https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf [accessed 30 June 2020]

health and the environment. We were told that farmers are trapped in a cycle where there is not enough emphasis or incentive on the need for healthy, environmentally sustainable produce. A significant proportion of food is highly processed by food manufacturers to a point where products contain high levels of energy (calories), salt, sugar and unhealthy types of fat, which contribute to disease risks; and low levels of fruit, vegetables, legumes, whole grains, nuts and seeds, which help to protect against diet-related diseases. Highly processed foods are then aggressively marketed and promoted to the consumer, often at discounted prices. While some responsibility lies with consumers themselves, it is clear that the food system is stacked against the consumer accessing a healthy diet, particularly for those with less choice and limited resources.

5. Our task was to focus on the links between the issues outlined above—food, inequality, public health, and sustainability—to identify where interventions (policy, regulatory or fiscal) might be applied, or reinforced, to tackle the serious health, social and environmental damage that is being inflicted by the current food system. We have brought these themes together under our central line of inquiry: how to ensure a healthy and sustainable diet can be accessed by everyone.

6. We examine these issues in more detail in the following chapters. However, we emphasise at the outset the following conclusions:

    (a) The externalities of the current food system—the cost to public health and to the environment—are unsustainable. Without further action and oversight by the Government, "others will always end up paying the true cost of cheap food."[21]

    (b) The issue of food insecurity is a serious concern, but it should not be viewed as a failure of the food system itself; it is a consequence of poverty and the economic and social failures that sit behind it. Measures to reduce poverty can and should be made elsewhere by the Government. Evidence shows that poverty-driven food insecurity drives people to adopt cheaper and less healthy diets, often with high levels of highly processed foods, resulting in health inequalities that manifest in obesity (particularly in children) and non-communicable diseases. People who have a hard time accessing food have an even harder time accessing healthy food.

    (c) In addition, problems accessing healthy food are felt across the population. The whole population is consuming diets that are too high in energy, unhealthy types of fat, salt and added sugar and the health system is shouldering the cost of this. By addressing the dependency on less healthy food in the food system, we can make progress towards more equitable access to healthy food for everyone.

7. Continuing with business as usual does not make economic sense. It will lead to greater costs to the public purse through an excess burden on the health system from preventable non-communicable diseases and through increasing environmental degradation. We should aim to ensure the food system provides safe, healthy and affordable food, that is built upon a resilient and sustainable agricultural system, at the same time as being economically viable. Our recommendations are aimed at driving changes to

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21   Written evidence from the Food Ethics Council (ZFP0054)

the food system to enable more people to access the food which will keep the population healthy and reduce the burden on the NHS, economy and the environment.

8.   Finally, we know that the outbreak of COVID-19 is having, and may continue to have, a very significant impact on the economy and the health of the nation. When the lockdown measures were first introduced, we had almost concluded our evidence gathering, but were forced to cancel three evidence sessions. While we did not have time to take formal evidence on the impact on the food system of the crisis, we have, where possible, reflected the most recent data, generated during the pandemic, on the areas covered by our inquiry. We note that a significant amount of scrutiny work is underway across Parliament on the impact of COVID-19 including an inquiry into COVID-19 and food supply being conducted by the House of Commons Environment, Food and Rural Affairs Committee.

9.   While we acknowledge that the Government is at the moment, rightly, focused on its response to COVID-19, our inquiry highlighted some serious, systemic problems with the food system, problems that the COVID-19 crisis only serves to underscore. Many people were already struggling to access a healthy diet, and the current crisis will worsen that situation, as more people face unemployment, uncertainty and the effects of ill health. It is, as the Food Foundation has stated: "A crisis on a crisis."[22]

The inquiry and the Committee's work

10. The Committee was first appointed by the House of Lords on 13 June 2019 to: "Consider the links between inequality, public health and food sustainability." This followed a recommendation from the House of Lords Liaison Committee that such a Committee be established. The Committee was originally set up with a requirement that it should report by 31 March 2020.

11. The Committee met for the first time on 25 June 2019. On 24 July 2019 we published our call for evidence, which is reprinted in Appendix 3.

12. The Committee's original work programme included taking evidence during around 20 evidence sessions spread over 14 meetings, concluding on 10 December 2019, and agreeing the report by the end of March 2020. Our programme was disrupted by three subsequent events. The prorogation on 10 September 2019 meant the Committee was dissolved. As the ruling by the Supreme Court meant that the prorogation was not lawful, the Committee was able to continue without being reappointed. Prorogation on 6 October, however, meant the Committee was dissolved again and was reappointed on 22 October 2019. After meeting only twice more, the Committee was yet again dissolved for the general election, and was not reappointed until 22 January 2020. The order reappointing the Committee required us to report by 23 June 2020.

13. Over the course of our inquiry, we received 105 submissions of written evidence and heard from 44 witnesses in 17 oral evidence sessions. We are very grateful to all those who took the time to provide us with evidence. A

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22   The Food Foundation, *Covid-19: latest impact on food*, (March 2020): https://foodfoundation.org.uk/covid-19-latest-impact-on-food/ [accessed 30 June 2020]

list of those who gave us written and oral evidence is included in Appendix 2, and is available on our website.

14. It was of vital importance that we heard from people with lived experience of food insecurity, and from those who are working 'on the ground' to tackle the issues the inquiry was set up to consider. We had planned, with the help of Sustain: the alliance for better food and farming, and Church Action on Poverty, an engagement session with people who have experienced food insecurity on 17 March 2020. Due to the growing concerns around the coronavirus, this event was cancelled. We were able instead to arrange phone calls between the individuals with whom we had planned to meet and the secretariat of the Committee. A note containing a summary of these conversations has been included in the report in Appendix 5. We thank Sustain and Church Action on Poverty for their support with this process and to the individuals who took the time to share their experiences with us.

15. The Committee also had a visit to Leeds planned for 18 March 2020, which again had to be cancelled. This was to include a visit to the Compton Centre, one of the Council's Community Hub sites, Neruka's Soup Kitchen, which provides meal provision for people in need of food, and CATCH, a community café and Healthy Holiday's Programme Leader. We are grateful to Emma Strachan and Nick Hart of Leeds Council who helped to plan the visit. Information and insights that Leeds Council and its local partners wanted to share with us were instead submitted as written evidence and are listed in Appendix 6.

16. Policies relating to food are largely devolved in the United Kingdom. Consequently, much of the evidence we received and the corresponding conclusions and recommendations we have drawn focus on the situation in England.

17. Inevitably, given the breadth and complexity of the issues involved, our reporting deadline of 23 June, and the considerable disruption to our timetable, it has not been possible to go into great depth in all the policy areas that impact on how we access food. Similarly, it was not possible to examine all aspects of the food system in granular detail. Instead, we have focused on those policy areas which seemed to be of principal concern, the areas that require the most urgent change and where we think intervention could help to achieve the greatest impact.

18. On 27 June 2019, the then Secretary of State for Environment, Food and Rural Affairs, the Rt. Hon. Michael Gove MP, commissioned Henry Dimbleby to conduct an independent review to help the Government create a National Food Strategy. The Government committed to responding with a White Paper six months after the review is published. The National Food Strategy review is ongoing, and we want to express our gratitude to Henry Dimbleby for providing evidence to us. The National Food Strategy review will doubtless contribute towards tackling many of the issues identified over the course of our inquiry, and we hope our recommendations will complement its work.

19. We are grateful to our two Specialist Advisers: Professor Elizabeth Robinson, Head of Applied Economics and Marketing at the School of Agriculture, Policy and Development at the University of Reading; and Professor Martin White, Professor of Population Health Research in the Centre for Diet

and Activity Research and MRC Epidemiology Unit, at the University of Cambridge. Their expertise has greatly assisted our deliberations during the course of this inquiry.

Box 1: A note on definitions

For the purposes of this report, we use the following terms and definitions:

- Food system. This term comprises: agriculture and horticulture; food manufacturing; food retail; the food environment, and the interaction of all of these elements with each other and consumers.

- Food environment. In the report, this term is used to describe the factors that impact on individual's food choices. It includes, but is not limited to, the physical presence of different types of food outlets and the physical layout of outlets, the marketing and advertising of foods and nutritional information.

- Food insecurity. The FAO defines food insecurity as "limited access to food, at the level of individuals or households, due to lack of money or other resources."[23] We also note the definition used by the Food Foundation and the UK's Low Income Diet and Nutrition Survey, 2007: "limited or uncertain availability of nutritionally adequate and safe foods or limited or uncertain ability to acquire acceptable foods in socially acceptable ways (e.g. without resorting to emergency food supplies, scavenging, stealing or other coping strategies)."[24]

- 'Food security' refers to a household or an individual's ability to access food. In the report, that is distinct from discussions on the resilience and continuity of the food supply.

- 'Healthy diet'. This term is generally understood to mean a diet that is high in fruits, vegetables, legumes, nuts, seeds and whole grains and low in unhealthy types of fat[25], salt and unrefined carbohydrates (e.g. added sugars). A healthy diet also contains sufficient, but not excessive energy (calories) and is low in foods that are 'energy dense' (i.e. foods that have a large number of calories per serving). In the UK, government recommendations for a healthy and sustainable diet are set out in the Eatwell Guide.[26] An 'unhealthy diet' is generally understood to be one that does not adhere to the properties set out above.

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23 FAO, IFAD, WFP and WHO, *The State of Food Security and Nutrition in the World,* (2017), p 96: http://www.fao.org/3/a-i7695e.pdf [accessed 29 June 2020]

24 The Food Foundation, *Too poor to eat: Food insecurity in the UK* (May 2016) p 3: https://enuf.org.uk/resources/too-poor-eat-food-insecurity-uk [accessed 30 June 2020]

25 All fats are energy dense, so should be eaten in moderation, but some fats are healthier than others, being essential for bodily functions (e.g. absorption of some vitamins, production of some hormones, development of cell membranes).

Healthier fats include polyunsaturated fats (e.g. pure vegetable oils, fish oils), monounsaturated fats (e.g. from some fruits, nuts and seeds, such as olive oil, peanut oil) and saturated fats derived from dairy products. Unhealthy fats include industrially processed fats (e.g. 'transfats'—now banned in the UK), and saturated fats from animal sources (e.g. red and processed meats): Jason Wu, Renata Micha, & Dariush Mozaffarian, 'Dietary fats and cardiometabolic disease: mechanisms and effects on risk factors and outcomes',. *National Reviews of Cardiology,* 16, 581–601 (2019) doi: 10.1038/s41569-019-0206-1: https://pubmed.ncbi.nlm.nih.gov/31097791/ [accessed 30 June 2020]

26 NHS, *The Eatwell Guide*: https://www.nhs.uk/live-well/eat-well/the-eatwell-guide/ [accessed 30 June 2020]

- 'Less healthy food'. This term is generally understood to mean foods that are high in unhealthy types of fat, salt or added sugar, and is used to describe foods that are low in fruits, vegetables, legumes, nuts, seeds and whole grains. The terms also covers foods that are 'energy dense', foods that have a large number of calories per serving.

- 'Highly processed foods.' The report also includes reference to 'highly processed' foods. These are foods that are created by a series of industrial techniques and processes. The Food and Agriculture Organisation (FAO) of the United Nations states that foods which have been highly processed (it uses the term 'ultra-processed') are: "energy-dense, high in unhealthy types of fat, refined starches, free sugars and salt, and poor sources of protein, dietary fibre and micronutrients and are made to be hyper-palatable and attractive, with long shelf-life, and able to be consumed anywhere, any time."[27]

- HFSS foods. The Childhood Obesity Plan refers to 'HFSS' foods, which it defines as products that are high in fat, sugar and salt.[28] The Department of Health and Social Care (DHSC), through its Standing Advisory Committee on Nutrition (SACN) developed its Nutrient Profiling Model (NPM) to define which foods are classified as HFSS. The NPM classification system was used to classify foods in the Ofcom regulation of the TV advertising of foods to children (2007) and has been proposed as the basis for classifying foods subject to further regulations in the Government's Childhood Obesity Plan. The NPM was updated in 2018, and the new version published, but it is yet to be implemented for new policies.[29]

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27 Carlos Monteiro, Geoffrey Cannon, Jean-Claude Moubarac, Renata Levy, Maria Louzada and Patricia Jaime,. 'The UN Decade of Nutrition, the NOVA food classification and the trouble with ultra-processing',. *Public Health Nutrition*. 2018;21(1):5–17. doi:10.1017/S1368980017000234: https://pubmed.ncbi.nlm.nih.gov/28322183/.[accessed 30 June 2020]

28 HM Government, *Childhood obesity: a plan for action, Chapter 2* (June 2018): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718903/childhood-obesity-a-plan-for-action-chapter-2.pdf [accessed 30 June 2020]

29 Public Health England, *Annex A The 2018 review of the UK Nutrient Profiling Model* (March 2018) p 9: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/694145/Annex__A_the_2018_review_of_the_UK_nutrient_profiling_model.pdf [accessed 30 June 2020]

CHAPTER 2: THE CURRENT SITUATION

20. Before examining the links between the core themes of the inquiry and drawing any conclusions about how to address the issues of food insecurity, diet-related ill health and food sustainability, it was important to consider the food system as a whole, to examine what it produces and what we consume, and the scale of the challenges that are present. The following sections set out a broad overview of the 'food system', focused in particular on agriculture, food and drink manufacturing, food and drink retailing, and consumer interaction with the food environment.

The food system at a glance

21. British food and farming are vitally important to UK industry. The agri-food sector (which DEFRA defines as including: agriculture and fishing; food and drink manufacturing; food and drink wholesaling; food and drink retailing; and non-residential catering) makes a major contribution to the UK's economy:

    - In 2018 the agri-food sector contributed £121 billion or 9.4 % to national GVA (Gross Value Added).[30] The food sector[31] employs around 4.1 million people[32] (see Figure 1).

    - The UK food and drink manufacturing sector contributes more than £28 billion to the economy and is the biggest manufacturing sector in the UK.[33] 96% of the UK's 7,400 food and drink manufacturing businesses are small and medium-sized enterprises (SMEs).[34]

    - Agriculture and fishing employs almost half a million people in the UK, and in 2018, contributed £10.4 billion to GVA.[35]

    - In 2018 the value of imports was greater than the value of exports in each of the broad categories of food, feed and drink except 'Beverages' which had a trade surplus of £1.81 billion, largely due to exports of Scotch Whisky (see Figure 2).[36]

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30   Department for Environment, Food and Rural Affairs, *National Statistics: Food Statistics in your pocket: Food Chain* (updated 30 March 2020): https://www.gov.uk/government/publications/food-statistics-pocketbook/food-statistics-in-your-pocket-food-chain [accessed 30 June 2020]

31   DEFRA states that 'food' includes non-alcoholic drinks: Department for Environment, Food and Rural Affairs, *National Statistics: Food Statistics in your pocket: Summary* (updated 30 March 2020): https://www.gov.uk/government/publications/food-statistics-pocketbook/food-statistics-in-your-pocket-summary#gross-value-added-of-the-uk-agri-food-sector-2018 [accessed 30 June 2020]

32   DEFRA states that the agri-food sector employs 4.1 million people if agriculture and fishing are included along with self-employed farmers: Department for Environment, Food and Rural Affairs, *National Statistics: Food Statistics in your pocket: Summary* (updated 30 March 2020): https://www.gov.uk/government/publications/food-statistics-pocketbook/food-statistics-in-your-pocket-summary [accessed 30 June 2020]

33   The Food and Drink and Federation, *Our Industry at a glance* (June 2020): https://www.fdf.org.uk/statsataglance.aspx [accessed 30 June 2020]

34   *Ibid.*

35   Department for Environment, Food and Rural Affairs, *National Statistics: Food Statistics in your pocket: Food Chain* (updated 30 March 2020): https://www.gov.uk/government/publications/food-statistics-pocketbook/food-statistics-in-your-pocket-food-chain [accessed 30 June 2020]

36   2018 figures are provisional. Department for Environment Food and Rural Affairs, *National Statistics: Food Statistics in your pocket: Global and UK supply* (Updated 30 March 2020): https://www.gov.uk/government/publications/food-statistics-pocketbook/food-statistics-in-your-pocket-global-and-uk-supply [accessed 25 June 2020]

- The supermarket industry is dominated by four large companies. The combined market share of food and non-alcoholic drinks of the largest four food and drink retailers (Tesco, Sainsbury's, Asda and Morrisons) was 50% in 2017–18 (see Figure 3). The three largest discount supermarkets (Aldi, Iceland and Lidl) had a combined market share of 16%, up from 6% in 2010.[37]

Figure 1: Breakdown of Gross Value Added (GVA) per food sector and employment figures per sector
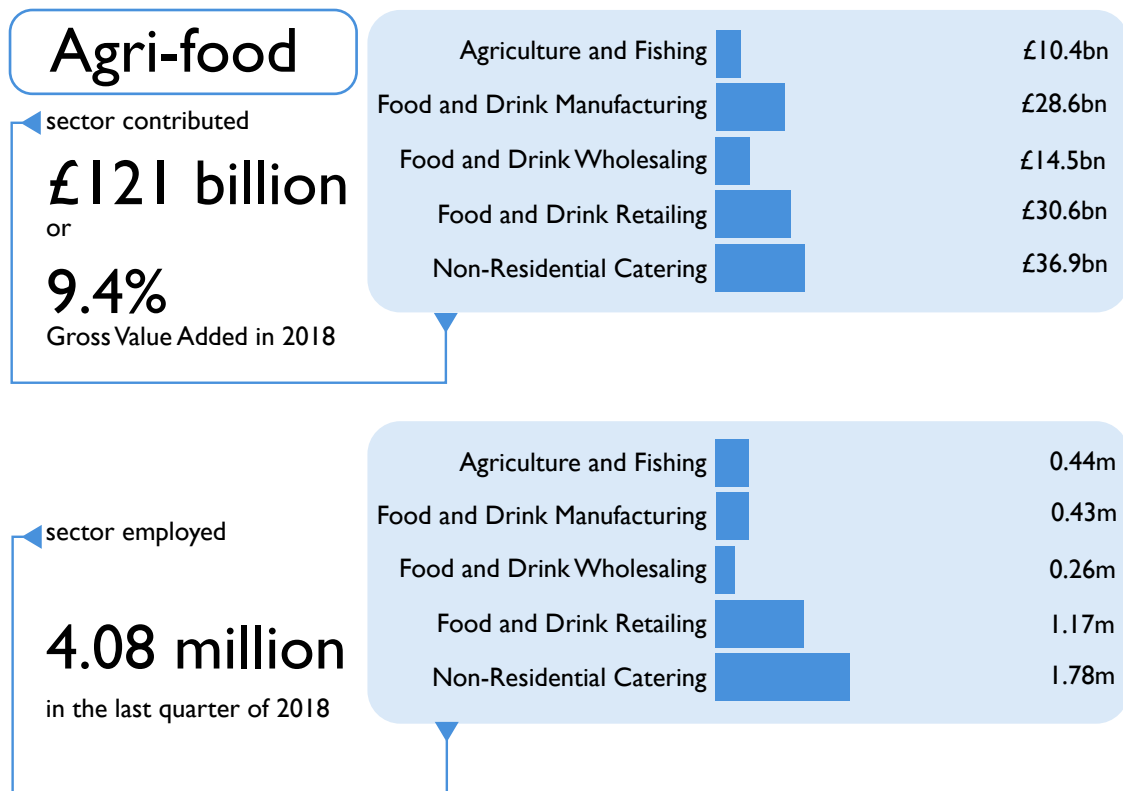
Source: Department for Environment, Food and Rural Affairs, 'National Statistics: Food Statistics in your pocket: Food Chain', (updated 30 March 2020): https://www.gov.uk/government/publications/food-statistics-pocketbook/food-statistics-in-your-pocket-food-chain#gross-value-added-of-the-uk-agri-food-sector-2018 accessed 25 June 2020]

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37   Department for Environment, Food and Rural Affairs, *National Statistics: Food Statistics in your pocket: Food Chain* (updated 30 March 2020): https://www.gov.uk/government/publications/food-statistics-pocketbook/food-statistics-in-your-pocket-food-chain [accessed 30 June 2020]

Figure 2: UK Trade in different food groups, 2018

■ imports £billion   ■ exports £billion

22. The industrial revolution changed our food system dramatically and together with free trade and cheap imports it has, over time, become disproportionately focused on the output of cheaper, less healthy foods. This has resulted in a situation where highly processed foods make up a significant proportion of the diet of typical families.[38]

   - In 2017, the largest manufacturing category (with a value of £6 billion, contributing 19% to the total food and drink manufacturing GVA), was 'other food products' which included prepared meals, confectionary, condiments and seasonings. Following this, bakery products made the second largest contribution (£3.9 billion), followed by meat and meat products (£3.7 billion).[39]

   - UK households have been shown to purchase the highest proportion of highly processed foods across 19 European countries. In the UK, more than half (50.7%) all total dietary energy from purchases came from highly processed foods, compared to only 10.2% in Portugal and 13.4% in Italy. Furthermore, this research found that across all 19 countries, for each 1% increase in national purchasing of highly processed foods, obesity prevalence increased by 0.25%.[40]

   - The proportion of advertising spend on less healthy foods is significantly higher than on more healthy products. The Food Foundation estimated that in 2017, over £300 million worth of advertising was spent on less

38   The Food Foundation, *Food System Challenges*: https://foodfoundation.org.uk/food-system-challenges/ [accessed 19 June 2020]

39   Department for Environment, Food and Rural Affairs, *National Statistics: Food Statistics in your pocket: Food Chain,* (updated 30 March): https://www.gov.uk/government/publications/food-statistics-pocketbook/food-statistics-in-your-pocket-food-chain [accessed 19 June 2020]

40   Written evidence from the University of Southampton and the MRC Life Course Epidemiology Unit Southampton General Hospital (ZFP0080) cited: CarlosMonteiro , et al (2018) Household availability of ultra-processed foods and obesity in nineteen European countries. Public Health Nutrition. 21(1):18-26, DOI: 10.1017/S1368980017001379

healthy food products, compared to £16 million spent on fruit and vegetables in the UK. Overall, it estimated that 46% of food and drink advertising is spent on confectionary, sweet and savoury snacks, with only 2.5% on fruit and vegetables.[41]

- The UK population's fruit and vegetable consumption is low. The latest National Diet and Nutrition Survey found that only 31% of adults, 32% of 65- to 74-year-olds and 8% of teenagers meet the 5 a day recommendation for fruit and vegetables.[42] The National Diet and Nutrition Survey also found that over the period 2008/09-2016/17, there was little change in fruit and vegetable consumption, with all age and sex groups showing a mean intake of below the 5 a day recommendation.[43]

- While consumption of fruit and vegetables is low, consumption of less healthy food is high. Evidence from the Food Foundation, the London School of Hygiene and Tropical Medicine (LSHTM) and Sustainable and Healthy Food Systems (SHEFS) highlighted research that suggested that 37% of adults' dietary energy comes from HFSS foods. It stated that children's diets were found to be even worse with 47% of primary school children's dietary energy from HFSS products.[44]

- Those in the poorest deciles are even less likely to meet recommendations on healthy eating guidance. Evidence from the Food Foundation, LSHTM and SHEFS stated that: "The poorest households only purchase 3.2 portions of fruit and vegetables per day"[45] and that only "17% of the poorest decile were consuming sufficient fruit and vegetables compared with 26% in the general population."[46]

41   The Food Foundation, *The Broken Plate*, (26 February 2019) p 14: https://foodfoundation.org.uk/wp-content/uploads/2019/02/The-Broken-Plate.pdf [accessed 30 June 2020]

42   Public Health England, *PHE's publishes latest data on nation's diet*, (16 March 2018): https://www.gov.uk/government/news/phe-publishes-latest-data-on-nations-diet [accessed 30 June 2020]

43   Public Health England and Food Standards Agency: *National Diet and Nutrition Survey, Years 1 to 9 of the rolling programme (2008/2009–2016/2017): time trend and income analyses* (January 2019) p 25: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/772434/NDNS_UK_Y1-9_report.pdf [accessed 30 June 2020]

44   Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073)

45   The Food Foundation, *Food system challenges*: https://foodfoundation.org.uk/food-system-challenges/ [accessed 29 June 2020]

46   Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073)

Figure 3: UK grocery market shares, 2017/18
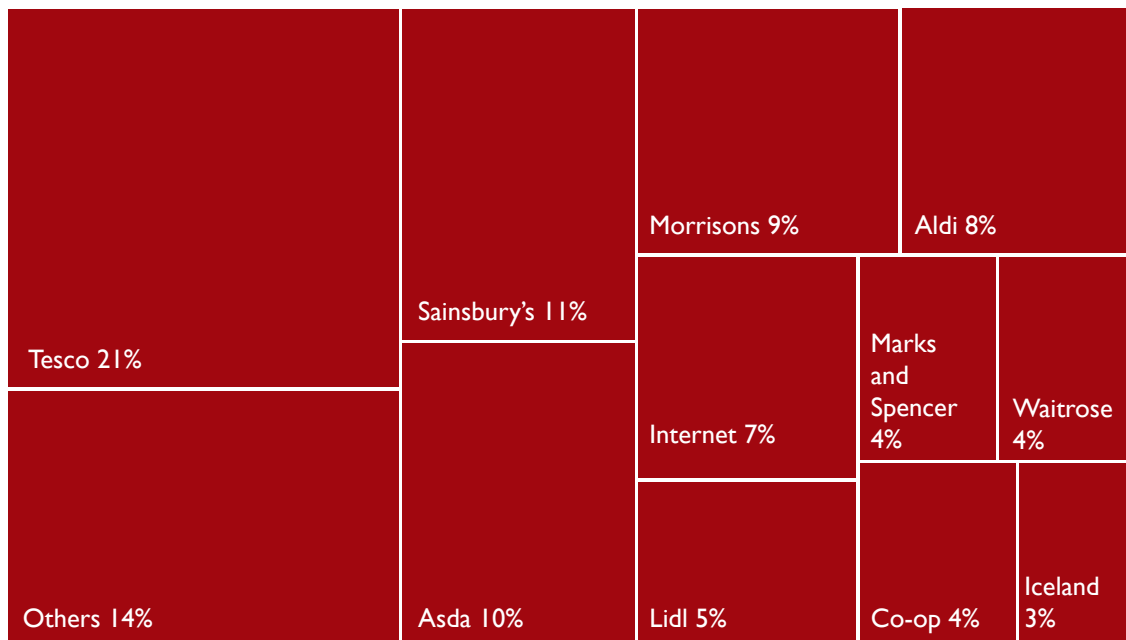
Tesco 21%	Sainsbury's 11%	Morrisons 9%		Aldi 8%
		Internet 7%	Marks and Spencer 4%	Waitrose 4%
Others 14%	Asda 10%	Lidl 5%	Co-op 4%	Iceland 3%

Source: Department for Environment Food and Rural Affairs, National Statistics: Food Statistics in your pocket: Food Chain, (30 March 2020): https://www.gov.uk/government/publications/food-statistics-pocketbook/food-statistics-in-your-pocket-food-chain *[accessed 30 June 2020]. 'Internet' includes online orders from the largest supermarkets.*

Diet and health

23. For most of the population in this country, buying food is based on choice, availability, price and personal preference. However, the dependency on less healthy, processed foods is having dire consequences for population health, and places a significant burden on the health system and the economy. The levels of obesity in the UK are perhaps the most obvious indication of the quality of the population's diet. Obesity is a risk factor for a number of health conditions, including coronary heart disease, type 2 diabetes, some types of cancer, and strokes.[47] The Government's own assessment of the scale and impact of obesity makes for concerning reading:

   • It is estimated that the NHS spent £6.1 billion on overweight and obesity-related ill health in 2014 - 2015. Annual spend on the treatment of obesity and diabetes is greater than the amount spent on the police, the fire service and the judicial system combined. Public Health England has warned that obesity has a serious impact on economic development, as it estimates that the overall cost of obesity to wider society £27 billion. Furthermore, PHE predicts that the UK-wide NHS costs attributable to obesity are projected to reach £9.7 billion by 2050, with wider costs to society estimated to reach £49.9 billion per year.[48]

   • Excess calorie consumption (in relation to energy expenditure) is the root cause of the obesity crisis. Overweight or obese children consume

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47 Public Health England, *'Health Matters: obesity and the food environment'*, (31 March 2017): https://www.gov.uk/government/publications/health-matters-obesity-and-the-food-environment/health-matters-obesity-and-the-food-environment--2 [accessed 30 June 2020]

48 *Ibid.*

up to 500 extra calories per day, depending on their age and sex, while adults consume between 200 and 300 calories too many.[49]

- In 2018, the majority of adults in England were overweight or obese (63%). Of these, 28% of adults were classified as obese. There has been a clear long-term increase in obesity levels from 15% in 1993 to 28% in 2018.[50] Hospital admissions where obesity was a factor rose by 23% between 2017/18 and 2018/19.[51]

- According to the Organisation for Economic Co-operation and Development (OECD), across its member countries[52], obesity rates continue to rise, with 56% of adults overweight or obese and almost one-third of children aged 5-9 are overweight (2019 publication).[53] In 2017, OECD data showed that, among the countries reporting measured data (rather than self-reported data), the UK had the tenth highest rates of obesity among adults from the 23 countries listed.[54]

24. A recently published (June 2020) report by Public Health England on the disparities in the risk and outcomes of COVID-19 suggested that "emerging evidence has established a need to better understand the association between obesity and COVID-19 particularly as 28% of adults in England in 2018 were obese (Body Mass Index (BMI) of 30kg/m^2 or more) and 3% were morbidly obese."[55] The PHE report cited three studies on the relationship between obesity and COVID-19:

- A report from the Intensive Care National Audit and Research Centre that used data up to 21 May 2020 and showed that 7.7% of patients critically ill in intensive care units (ICU) with confirmed COVID-19 were morbidly obese compared with 2.9% of the general population (after adjusting for age and sex). This disparity was also seen when looking at white and non-white patients separately. The report also showed a relationship between BMI and death from COVID-19 in BMI over 30 kg/m^2.[56]

49   Public Health England, *Sugar Reduction Programme, Progress made by the industry in the first year*, (May 22 2018): https://publichealthengland.exposure.co/sugar-reduction-programme [accessed 30 June 2020]

50   NHS Digital, *Statistics on Obesity, Physical Activity and Diet, England, 2020,* (published 5 May 2020): https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-obesity-physical-activity-and-diet/england-2020/part-3-adult-obesity-copy [accessed 30 June 2020]

51   NHS Digital, *Statistics on Obesity, Physical Activity and Diet, England, 2020',* (5 May 2020):https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-obesity-physical-activity-and-diet/england-2020 [accessed 30 June 2020]

52   List of OECD countries: https://www.oecd.org/about/document/list-oecd-member-countries.htm

53   OECD, *Health at a Glance 2019, OECD indicators*, (2019) p 10: https://www.oecd-ilibrary.org/docserver/4dd50c09-en.pdf [accessed 30 June 2020]

54   NHS Digital, *Statistics on Obesity, Physical Activity and Diet, England, 2020,* (5 May 2020): https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-obesity-physical-activity-and-diet/england-2020/part-3-adult-obesity-copy [accessed 30 June 2020]

55   Public Health England, *Disparities in the risk and outcomes of COVID-19* (June 2020) p 60: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/891116/disparities_review.pdf [accessed 30 June 2020]

56   PHE states that this analysis controlled for other demographics and health conditions but is restricted to those patients admitted to ICU from 289 participating trusts. Public Health England, *Disparities in the risk and outcomes of COVID-19* (June 2020) p 60: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/891116/disparities_review.pdf [accessed 30 June 2020

- A study using data from over 400,000 patients aged 40 to 69 from UK Biobank linked to COVID-19 test data from PHE found that higher BMI was associated with a positive COVID-19 diagnosis.[57]

- A study by the OpenSAFELY collaborative used a dataset of 17 million adult primary care electronic health records linked to deaths data from the COVID-19 Patient Notification System up to 25 April 2020. This found a relationship between death from COVID-19 and BMI when controlling for demographics and other health conditions.[58]

Public Health England noted that, although measuring the different outcomes of dying from COVID-19 once in ICU, contracting COVID-19 and dying from COVID-19, all three studies showed a relationship between COVID-19 and increasing BMI. PHE stated that these findings were also consistent with studies from other countries.[59]

Health inequalities

25. Given the focus of our inquiry, we were particularly concerned about the extent to which diet-related ill health affects those in lower income groups. There is considerable evidence to suggest that there is inequality when it comes to being able to eat a healthy diet:

- In 2017, prevalence of excess weight was 11 percentage points higher in the most deprived areas than the least deprived areas. In the most deprived tenth of areas, 67% of people were overweight or obese, compared to 56% in the least deprived.

- Children living in deprived areas are around twice as likely to be obese. Among children aged 4-5, 12.4% of those in the most deprived areas were obese compared to 6.4 % in the least deprived areas. By age 10-11, this had risen to 26.7% in the most deprived areas compared to 13.3% in the least.[60]

26. Figures from the Office for National Statistics have shown that life expectancy for males in the most deprived areas can be up to 9.5 years less than those in the least deprived areas, with the difference at 7.7 years for females.[61] (See Figure 4).

27. In February 2020, Health Equity in England: *The Marmot Review 10 years on* was published, the follow up report to Professor Sir Michael Marmot's

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57   PHE states that compared with non-overweight people (BMI < 25 kg/m2), the odds ratios were 1.26 (confidence interval of 1.01-1.56) for those who were overweight, 1.37 (1.06-1.76) for those in obese class I and 2.04 (1.50-2.77) for those in obese classes II and III combined. Public Health England, *Disparities in the risk and outcomes of COVID-19* (June 2020) p 60: https://assets.publishing.service. gov.uk/government/uploads/system/uploads/attachment_data/file/891116/disparities_review.pdf [accessed 30 June 2020]

58   PHE states that the hazard ratio compared to those who were not obese increased as BMI increased and was 1.27 (1.18-1.36) for those in obese class I, 1.56 (1.41-1.73) for those in obese class II and 2.27 (1.99 to 2.58) for those in obese class III (morbidly obese).

59   Public Health England, *Disparities in the risk and outcomes of COVID-19* (June 2020) p 60: https:// assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/891116/ disparities_review.pdf [accessed 30 June 2020]

60   House of Commons Library, Obesity Statistics, Briefing Paper Number 3336, 6 August 2019

61   Office for National Statistics, *Health state life expectancies by national deprivation deciles*, England: 2016 to 2018', (27 March 2020): https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/ healthinequalities/bulletins/healthstatelifeexpectanciesbyindexofmultipledeprivationimd/2016to2018 [accessed 30 June 2020]

landmark report on health inequalities. The report examined the progress that has been made in addressing health inequalities in England over the last decade. It stated that:

- Life expectancy follows the social gradient—the more deprived the area the shorter the life expectancy. This gradient has become steeper; inequalities in life expectancy have increased. Among women in the most deprived 10 percent of areas, life expectancy fell between 2010–12 and 2016–18.

- The gradient in healthy life expectancy is steeper than that of life expectancy. It means that people in more deprived areas spend more of their shorter lives in ill health than those in less deprived areas.[62]

Figure 4: Life expectancy and healthy life expectancy by age, sex and deprivation decile in England, 2016-18
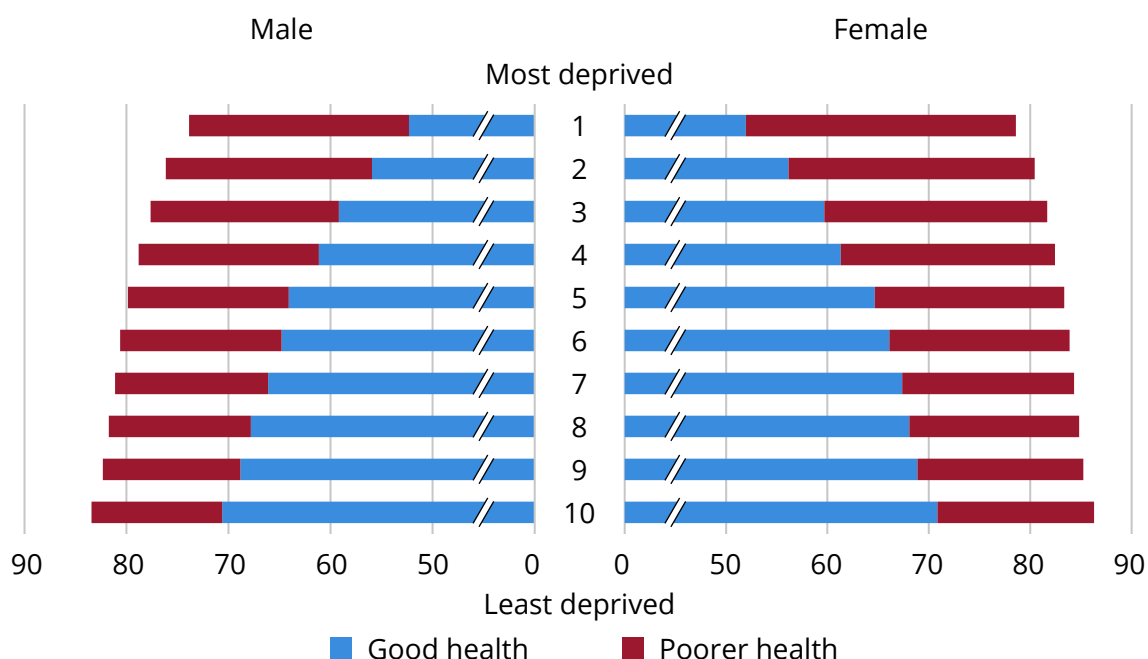
Source: Office for National Statistics, 'Health state life expectancies by national deprivation deciles, England: 2016 to 2018', 27 March 2020: https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/ healthinequalities/bulletins/healthstatelifeexpectanciesbyindexofmultipledeprivationimd/2016to2018. Life expectancy refers to period life expectancy, the average number of years a person would live, if they experienced that particular area's age-specific mortality rates for that time period throughout their life. Based on survey data. Survey respondents who answered their general health as "very good" and "good" were classified as having good health. Those who answered "fair", "bad" and "very bad" were classified as having poorer health.

28.   The report also referred to the issue of food insecurity and observed that:

"One of the clearest and most immediate impacts of being in poverty is an inability to buy nutritious food. The 2010 Marmot Review discussed the relationship between food and health but the common use of food banks and the term arose after the report was published. There is also widespread concern at food insecurity and poor nutritional intake and

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62   Institute of Health Equity, *Health Equity in England: The Marmot Review 10 year on* (February 2020) p 84: https://www.health.org.uk/sites/default/files/upload/publications/2020/Health%20Equity%20 in%20England_The%20Marmot%20Review%2010%20Years%20On_full%20report.pdf   [accessed 30 June 2020]

impacts on health and wellbeing; likely contributing to inequalities in cancer, diabetes and coronary heart disease."[63]

29. Diet-related ill health is more likely to affect those in lower income groups and it is reasonable to conclude that those who are struggling to eat are certainly struggling to eat well. Evidence from the Food Foundation, LSHTM and SHEFS told us that:

> "Food insecurity not only damages physical health but also causes social harm bringing profound anxiety and stress to families and can affect children's school attendance, achievement and attainment. It is associated with poor social well-being, poor quality of life and unhealthy lifestyles with food insecure children being more likely to report poorer health status and more likely to be hospitalised than food secure children."[64]

30. Professor Marmot also pointed to the relationship between food insecurity and poor diet, stating that:

> "There is evidence to reject the twin notions that people are poor because they make poor choices, and that the poor health of the poor results from poor choices. Rather, it is poverty that leads to less healthy choices and the poor health of those lower down the social hierarchy results from the restricted range of options available to those on low incomes, as well as the direct health impacts associated with the stresses and poor conditions which result from poverty."[65]

31. The report by Public Health England on the disparities in the risk and outcomes of COVID-19 confirmed that the impact of COVID-19 has replicated existing health inequalities, and in some cases, has increased them. It found that:

- Risk of dying among those diagnosed with COVID-19 was also higher in males than females; higher in those living in the more deprived areas than those living in the least deprived; and higher in those in Black, Asian and Minority Ethnic (BAME) groups than in White ethnic groups.

- People who live in deprived areas have higher diagnosis rates and death rates than those living in less deprived areas. The mortality rates from COVID-19 in the most deprived areas were more than double the least deprived areas, for both males and females.[66]

63 Institute of Health Equity, *Health Equity in England: The Marmot Review 10 year on* (February 2020) p 84: https://www.health.org.uk/sites/default/files/upload/publications/2020/Health%20Equity%20 in%20England_The%20Marmot%20Review%2010%20Years%20On_full%20report.pdf [accessed 30 June 2020]

64 Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073)

65 Institute of Health Equity, *Health Equity in England: The Marmot Review 10 year on* (February 2020) p 35: https://www.health.org.uk/sites/default/files/upload/publications/2020/Health%20Equity%20 in%20England_The%20Marmot%20Review%2010%20Years%20On_full%20report.pdf [accessed 30 June 2020]

66 Public Health England, *Disparities in the risk and outcomes of COVID-19* (June 2020): https://assets. publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/891116/ disparities_review.pdf [accessed 30 June 2020]

Diet and food production

32. We also received evidence on the environmental impact of food production, including that:

  • Agriculture is responsible for 87% of UK ammonia emissions (mainly from livestock farming and fertiliser use. Agriculture is also responsible for 10% of the UK's greenhouse gas emissions.[67]

  •   Evidence from the Food Foundation, the London School of Hygiene and Tropical Medicine (LSHTM) and SHEFS highlighted LSHTM research which had found that the least healthy diets on average produce around 25% more greenhouse gas emissions than the healthiest, largely because they contain more meat and less fruit and vegetables.[68]

  • There are high levels of food waste in the UK: "an estimated 10.2 million tonnes of food and drink are wasted annually after the farm gate, worth around £20 billion."[69]

33. A number of witnesses suggested that the current food system is biased towards producing less healthy foods. UK Research and Innovation provided the following summary of the impact of this demand:

  "Food production processes directly and indirectly impact consumers' dietary choices, with the effects related to food production extending across income groups, with some impacted more than others. The global food system produces more grains, sugars and fats than we need for health, but not enough fruits and vegetables. These grains, sugars and fats are highly subsidised, and when refined and combined in manufacturing, lead to cheap and unhealthy products that permeate our food environments, resulting in over-consumption, poor nutrition and health."[70]

Current Government intervention

Childhood Obesity Plans

34. In August 2016, the Government published *Childhood Obesity: A Plan for Action*, the first of three chapters which include measures to help tackle meet the Government's ambition both to halve childhood obesity and to reduce significantly the gap in obesity between children from the most and least deprived areas by 2030.[71]

35. Although this ambition has been welcomed, concerns have been raised that significant challenges still exist, including: that childhood obesity rates are showing little signs of reducing, and are actually increasing in some age groups; that obesity continues to place a considerable burden on the NHS; and that some of the measures outlined in the Plan are not sufficiently robust

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67 Department for Environment, Food and Rural Affairs, *The future farming and environment evidence compendium* (September 2019): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/834432/evidence-compendium-26sep19.pdf [accessed 30 June 2020]

68 Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073)

69 Written evidence from HM Government (ZFP0079)

70 Written evidence from UK Research and Innovation (ZFP0039)

71 Department of Health and Social Care, *Childhood Obesity: a plan for action, Chapter 2* (June 2018) p 5: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718903/childhood-obesity-a-plan-for-action-chapter-2.pdf [accessed 30 June 2020]

or sustainable to facilitate the change in levels of childhood obesity needed to meet the Government's 2030 target.

36. The efficacy of the individual policies set out in the chapters of the Childhood Obesity Plan are considered in further detail in Chapter 4, the Food Environment. There was, however, a clear consensus across the evidence that efforts to tackle obesity have stalled. This was a view very clearly expressed by Professor Susan Jebb, Professor of diet and population health at the University of Oxford, who said:

> "Action is still far too slow. Most of the childhood obesity plans have said, "We will consult on", "We will discuss", "We will consider", or, "We will think about". Many of those consultations have been out and closed months and months ago. There is simply no apparent sense of urgency."[72]

37. In 2019, Professor Dame Sally Davies, the then Chief Medical Officer, published an independent report on childhood obesity, which stated that: "The Government ambition is to halve childhood obesity by 2030—in England, we are nowhere near achieving this."[73] The report went on to conclude that:

> "The Government has laid important foundations for change with two 'chapters' of a national childhood obesity plan, a prevention green paper, Advancing our health: prevention in the 2020s, and the NHS Long Term Plan. If implemented in full, these plans will significantly reduce levels of childhood obesity and improve our children's health. This would be a major achievement, but the plans, alone, will not meet the 2030 ambition. To meet the ambition and children's needs, we must go further and faster."[74]

38. Jenny Oldroyd, Deputy Director Obesity, Food and Nutrition at the Department of Health and Social Care (DHSC), highlighted that UNICEF and World Obesity Federation reports had set out how the UK is paving the way to ensure children grow up in a healthy food environment.[75] When questioned further by the Committee, however, as to whether there was any evidence to suggest that childhood obesity is declining, Jenny Oldroyd confirmed that: "No, that evidence is not there at the moment … It is slowly moving up."[76]

Agriculture Bill

39. The Agriculture Bill 2019–20 (preceded by the Agriculture Bill 2017–19 which fell at Dissolution in October 2019), will provide the legislative framework for agriculture support schemes to replace the EU's Common Agricultural Policy (CAP). Current payments to farmers for environmental protection are incorporated within the Countryside Stewardship funding or

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72 Q 65 (Professor Susan Jebb)
73 Professor Dame Sally Davies, *Time to Solve Childhood Obesity. An Independent Report by the Chief Medical Officer* (2019), p 2: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/837907/cmo-special-report-childhood-obesity-october-2019.pdf [accessed 30 June 2020]
74 *Ibid.*
75 Q 17 (Jenny Oldroyd)
76 *Ibid.*

the Basic Payment Scheme, and will be replaced by the Environmental Land Management scheme (ELMS) contained in the Agriculture Bill.

40. The ELMS proposes to reward a number of environmental 'public goods' with public money. The Government will support and reward farmers for providing improved environmental outcomes such as improved soil health and carbon emissions. The Department told us that the scheme may lead some farmers to move away from "traditional agricultural activity".[77] The discussions of the scheme, including what, exactly, farmers will be rewarded for and the frameworks by which progress will be measured, are at a very early stage, and few details are available.

National Food Strategy

41. The Government told us that it recognises that there are a number of interconnected challenges across the food system, including food security, health and climate change. It told us that its response to these challenges has been to commission the National Food Strategy review.[78]

42. On 27 June 2019, the Department for Environment, Food and Rural Affairs (DEFRA) announced an independent review of the UK food system. The review, supported by DEFRA officials and an advisory group, is being led by Henry Dimbleby, co-founder of the restaurant chain Leon, and lead non-executive board member of DEFRA. Its findings will be used to develop a National Food Strategy for England.

43. The review aims to address environmental and health problems caused by our food system, to ensure the security of our food supply, and to maximise potential of the coming revolution in agricultural technology. The aims of the National Food Strategy were universally welcomed throughout the evidence.

The 'real' cost of food

44. Throughout the evidence, a clear concern emerged; that, through the damage to health and the environment it causes, the food system is generating considerable 'external' costs (sometimes referred to as 'externalities') that it is not accounting for. Professor Tim Lang, Professor of Food Policy, City University of London stated that: "We have very cheap food, relatively, but the costs are dumped elsewhere, on health and on the environment."[79]

45. According to one estimate made by the Sustainable Food Trust:

> "for each £1 spent on food in the shops in the UK, consumers incur extra hidden costs of £1. In addition to the £120 billion spent annually on food by consumers in the UK as a whole, the UK food system generates further costs of £120 billion in external costs."[80]

46. In reaching the figure of the "hidden £1", the Sustainable Food Trust stated that it had accounted for the cost of factors, including: natural capital degradation; biodiversity loss; diet-related ill health; farm support payments;

77   Q 29 (Alison Ismail)
78   Written evidence from HM Government (ZFP0079)
79   Q 2 (Professor Tim Lang)
80   Written evidence from the Sustainable Food Trust (ZFP0007)

and regulation[81] though we recognise that this is just one view on the potential external costs of the food system.

47. A number of witnesses suggested that extra costs incurred by the food system to health and the environment are currently not paid by the food manufacturers and retailers that cause the damage, nor are they included within the retail price of food. The Sustainable Food Trust claims those costs are passed on to the public through "taxation, lost income due to ill health and the price of mitigating and adapting to climate change and environmental degradation."[82]

Conclusions

48. The food system is vast and complex. Any measures aimed at 'wider system change' will need to take into account the diversity of the industries. Decisions about the food system will also have implications for health and for the economy. As Henry Dimbleby, the leader of the National Food Strategy Review, said about the food system: "it is almost impossible to act on it in any way without creating winners and losers."[83]

49. Over the course of the inquiry, we have encountered several 'quick fix' policy areas. These are either: policies which are being poorly implemented and not therefore having the intended effect, or policies which are causing harm and should be removed.

50. Many witnesses spoke of the need for overwhelming 'system change', although this term was not satisfactorily explained. We have decided to refine these requests and recommend an overhaul of Government policy to address three specific problem areas identified in the evidence as crucial to the functioning of the current 'system':

   (a) Changing 'the food environment', for example by regulation, education, or incentive;

   (b) Changing agricultural practices by altering criteria for farming subsidies and providing support and clarity to the sector; and

   (c) Improving the governance of 'food policy' and integrating this into social and economic policy.

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81   The full breakdown of these extra costs was listed as: natural capital degradation; biodiversity loss; production-related ill health; diet related disease; imported food; farm support payments; and regulation and research. The Sustainable Food Trust, *The Hidden Cost of UK Food* (21 November 2017) p 8: https://sustainablefoodtrust.org/wp-content/uploads/2013/04/Website-Version-The-Hidden-Cost-of-UK-Food.pdf [accessed 30 June 2020]

82   The Sustainable Food Trust, *The Hidden Cost of UK Food* (21 November 2017): https://sustainablefoodtrust.org/articles/hidden-cost-uk-food/ [accessed 30 June 2020]

83   Q 100 (Henry Dimbleby)

CHAPTER 3: POVERTY AND FOOD INSECURITY

51. Poor diet can have a significant impact upon an individual's health and life chances and is associated with considerable, unacceptable costs to the NHS and UK economy. Incidences of poor diets and resultant health problems, though widespread in every demographic, are more densely concentrated in lower income groups who must overcome far greater hurdles to access a healthy diet than their more fortunate counterparts. These individuals and groups are significantly more likely to suffer from the particularly acute levels of food insecurity marked by visits to food banks and, in some cases, persistent hunger. One academic described food insecurity as: "a public health emergency".[84] The outbreak of COVID-19 has had a significant impact on income for many people, exacerbating existing problems of poverty and food insecurity. We have, where possible, incorporated some of the preliminary analysis of this impact into our report.

52. Food insecurity should have no place in 21st century Britain. No individual should be skipping meals because there is insufficient food for themselves or their family. And yet, this is still the case. We were compelled to ask: how does the situation of food insecurity arise and what could be done to prevent it? The first section of this chapter therefore addresses the causes of food insecurity, concluding that it is a symptom of poverty. It is important to understand the lived reality behind the statistics, so this chapter draws from what people with lived experience of poverty and food insecurity told us. It was beyond our remit to address the root causes of poverty, but it was perhaps inevitable that we make some comment on areas that were drawn to our attention: particularly the five-week wait for the first payment of Universal Credit (UC) which has for many represented a crisis leading to hunger.

53. Beyond this issue of acute food insecurity is a wider issue: access to healthy diets. A large proportion of the population, not just the poorest in society, cannot easily access a healthy, balanced diet that provides them with the right quantities of the nutrients they need. Like hunger, this is a type of malnutrition—in this case, individuals can be both overnourished with calories and at the same time undernourished in relation to key nutrients.[85] No demographic group in the UK meets the Government's guidance on healthy diets, and levels of obesity and diet related ill health are too high in every demographic group—but both obesity and diet-related ill health disproportionally affect lower income groups.

54. The question of the affordability of healthy food arose early in our inquiry: healthy food has been shown to be three times more expensive, calorie for calorie, than less healthy alternatives. We were also directed to research estimating the true cost of meeting the Government's recommendations for healthy eating, including unsettling statistics demonstrating the large proportion of disposable income that the poorest families would have to spend to meet them. We investigated the benefits system and asked why consideration of the cost of a healthy diet does not form part of its design. Other barriers to healthy diets, including physical resources and the increased level of effort and 'emotional bandwidth' required for the poorest

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84   Written evidence from Dr Sinéad Furey (ZFP0019)

85   Environmental Audit Committee, *Sustainable Development Goals in the UK follow up: Hunger, malnutrition and food insecurity in the UK* (Thirteenth Report, Session 2017–19, HC 1491)

families to meet these recommendations also emerged as very real barriers to consuming a healthy diet.

Box 2: Experiences of food insecurity

In a series of phone calls, facilitated by Sustain and Church Action on Poverty, the secretariat spoke with individuals who have experienced food insecurity.

Heather from Newcastle said:

> "In Biker, people are on the pre-paid meters so they've got to go and top up their electricity, however many times, so it will be the same for them, having to look constantly how much electricity, how much gas they've got, and then trying to work out exactly how much it is going to cost to boil that kettle. Is it going to be cheaper to boil that kettle to make a pot noodle or is it going to be cheaper to try and cook something from their freezer, like a pizza? Is it going to be cheaper to put that in the oven? Or is it going to be a case of you just don't cook that night. Constant awareness, constant choices but it's not really a choice because you have no choice but to think of things like that, and it is mentally draining."

Source: See Appendix 5.

Measurements of poverty

55. All measures of poverty rely, to some degree, on determining the amount of money available to people. The Government's definition of poverty is based on the median household income without reference to expenditure other than housing costs. Other measurements, including those based on the recommendations of the Social Metrics Commission, (SMC)[86] include measurements of other aspects of life which affect spending power such as savings and living costs. As defined by the Joseph Rowntree Foundation (JRF), income must be related to necessary outgoings: "poverty is when your resources fall well below your needs."[87]

56. The SMC recommended a new measure of poverty which is based on the extent to which someone's resources meet their needs. There was broad support for this measure. Helen Barnard, Deputy Director of Policy and Partnerships at the Joseph Rowntree Foundation, told us that:

> "The best measure that we have now is the Social Metrics Commission measure. This is particularly because it takes into account the inescapable costs—such as housing, childcare and the costs of being disabled—as well as your resources, which are income but also things such as liquid savings. Those two sides of the equation are very important: it is not just about how much income you have but about what things cost."[88]

57. Garry Lemon, Director of Policy, External affairs and Research at the Trussell Trust, explained that by considering costs as well as expenses, "you can see that groups that have had policy solutions put in place for them are

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86 Social Metrics Commission, *Social Metrics Commission 2018 Report* (September 2018): https://socialmetricscommission.org.uk/social-metrics-commission-2018-report/ [accessed 30 June 2020]. The Social Metrics Commission was established in 2016 to determine a new series of poverty metrics to better reflect the reality of poverty in the UK.

87 Q 31 (Helen Barnard)

88 *Ibid.*

less likely to be in poverty than in the past. For example, particularly with older people we have seen an impressive decrease in poverty."[89] Mr Lemon suggested better understanding of poverty levels could help to improve policy making, and suggested that, "the decrease in poverty for older people is an example of where good evidence-based policy can make a real difference if the numbers are understood properly."[90]

58.   The headline poverty measures used in the UK count the number of individuals falling below a threshold of household income. One commonly used measure is people in relative low income (sometimes referred to as relative poverty). This counts people living in households with income below 60% of the median household income. Another measure is absolute low income (or absolute poverty), which counts people living in households with income below 60% of the median in some base year (usually 2010/11),[91] uprated for inflation.[92] Income can be measured before housing costs (BHC) or after housing costs (AHC).

59.   The 2018/19 figures for the UK suggest that:

•   11 million people (17%) are in relative low income BHC and 14.5 million AHC (22%). This includes 2.8 million children (20%) in relative low income BHC and 4.2 million AHC (30%).[93]

•   9.7 million people (15%) are in absolute low income BHC and 12.9 million AHC (20%). This includes 2.4 million children (17%) in absolute low income BHC and 3.7 million AHC (26%).[94]

These figures are also outlined in Figure 5.

60.   Trend analysis of poverty statistics suggests that, over the longer-term, there has been a reduction in poverty rates since the late 1990s for children, pensioners and working-age parents. However, for working-age adults without dependent children, the likelihood of being in relative low income has increased. There are also suggestions that poverty rates as a whole have started to increase. Projections from the Institute for Fiscal Studies and the Resolution Foundation,[95] indicate that:

"The official rate of relative AHC poverty is projected to rise by over 2 [percentage points] between 2015–16 and 2021–22. All of the projected increase in relative poverty is driven by relative child poverty, which is projected to rise by 7 [percentage points]."[96]

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89   Q 32 (Garry Lemon)
90   *Ibid.*
91   There appears to be no statistical basis to this 'base year', which is only occasionally reviewed.
92   House of Commons Library, Poverty in the UK: statistics, Briefing Paper, Number 7096, 29 April 2020
93   *Ibid.* For the purposes of the data, a 'child' is an individual aged under 16 or one aged 16 to 19 years old who is not married, in a civil partnership nor living with a partner, living with parents/a responsible adult and in full-time non-advanced education or in unwaged government training.
94   House of Commons Library, Poverty in the UK: statistics, Briefing Paper, Number 7096, 29 April 2020
95   Which estimate how the incomes of different households would evolve up to 2021–22. Estimates are based on if current tax and benefit policy plans are kept to and if the macroeconomic forecasts from the Office of Budget Responsibility—for things such as earnings and employment—were correct.
96   Institute for Fiscal Studies, *Living Standards, poverty and inequality in the UK: 2017–18 to 2021–2022* (November 2017): https://www.ifs.org.uk/uploads/publications/comms/R136.pdf [accessed 30 June 2020]

Trends in the SMC measure are similar to relative poverty measured after housing costs (AHC), though the SMC measurement gives a lower percentage for pensioner poverty, and higher for poverty among children and people in families where someone is disabled than the official statistics.[97]

61. Alison Garnham, Chief Executive of the Child Poverty Action Group (CPAG), highlighted that child poverty has risen significantly and that the figures for child poverty also highlight the levels of in work poverty. She stated that child poverty, "has risen by 500,000 since 2010, up to 4.1 million from 3.6 million. According to the Institute for Fiscal Studies, we expect that level to go on rising to above 5 million. Seven out of 10 of those children live with at least one parent who works."[98] Ms Garnham highlighted that the proportion of in work poverty has a particular impact on children in those families because fewer of them are entitled to support like free school meals which are based on receipt of benefits.[99]

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97 House of Commons Library, Poverty in the UK: statistics, Briefing Paper, Number 7096, 29 April 2020

98 Q 32 (Alison Garnham) Ms Garnham was giving evidence in October 2019, at which time the number of children known to be in relative low income after housing costs was 4.1 million. Based on 2018/19 figures this has risen further, to 4.2 million.

99 Q 32 (Alison Garnham)

Figure 5: Number and proportion of adults and children in relative and absolute poverty, before and after housing costs, UK, 2018/19

11 million people, including 2.8 million children, are in **relative** poverty **before** housing costs.

14.5 million people, including 4.2 million children, are in **relative** poverty **after** housing costs.

9.7 million people, including 2.4 million children, are in **absolute** poverty **before** housing costs.

12.9 million people, including 3.7 million children, are in **absolute** poverty **after** housing costs.

Source: Department for Work and Pensions, Households below average income (HBAI) statistics, (26 March 2020): https://www.gov.uk/government/collections/households-below-average-income-hbai--2 [accessed 30 June 2020]

COVID-19 and poverty

62.   Following the outbreak of COVID-19, it became clear that the figures on poverty we received at the beginning of the inquiry may no longer reflect the current and future reality. The World Bank has estimated that up to 60

million people worldwide will be pushed into "extreme poverty" as a result of the pandemic[100] and the UK will not be exempt from this trend.

63. Official national statistics indicating the impact of the COVID-19 outbreak on the UK labour market are not yet available but there are some clear indicators that coronavirus will have a significant effect on poverty levels. Some sectors have almost entirely shut down, [101] and a sharp recession appears likely.[102] The Chancellor, the Rt. Hon. Rishi Sunak MP, told the House of Lords Economic Affairs Committee that:

> "I certainly will not be able to protect every job and every business. We are already seeing that in the data. No doubt there will be more hardship to come. This lockdown is having a very significant impact on our economy. We are likely to face a severe recession, the likes of which we have not seen, and that will have an impact on employment."[103]

64. Analysis of YouGov survey data by the Food Foundation has found that 2% of respondents had lost all of their income, whilst 6% said they have had to borrow money or take out personal loans as a result of COVID-19.[104] New Universal Credit claims increased dramatically at the start of the COVID-19 outbreak. Since 16 March to the end of April 2020, the Department for Work and Pensions received over 1.8 million claims for Universal Credit, over 250,000 claims for Jobseeker's Allowance, and over 20,000 claims for Employment and Support Allowance. Overall, this is six times the volume that it would typically experience and in one week, there was a 10-fold increase. The rate for Universal Credit claims appears to have stabilised at about 20, 000 to 25,000 per day which is double that of a standard week pre-COVID-19. The DWP has stated that they issued almost 700,000 advances to claimants who felt they could not wait for their first routine payment and that the vast majority of these claimants received money within 72 hours.[105]

65. It appears that, financially, lower earners have been hardest hit by the outbreak, with one third of employees in the bottom 10% of earners working in shut down sectors, compared to 5% in the top 10%. Moreover, less than 10% in the bottom half of earners say they can work from home.[106]

Food insecurity

66. The term 'food poverty' is often used interchangeably with the term 'food insecurity'. Food insecurity has been described as: "limited or uncertain availability of nutritionally adequate and safe foods or limited or uncertain ability to acquire acceptable foods in socially acceptable ways (e.g. without resorting to emergency food supplies, scavenging, stealing or other coping

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100 BBC, *Coronavirus: World Bank warns 60m at risk of "extreme poverty"*, (20 May 2020): https://www.bbc.co.uk/news/business-52733706 [accessed 30 June 2020]

101 House of Commons Library, Coronavirus: Impact on the Labour market, Briefing Paper Number 8898, 30 April 2020

102 BBC, *Bank of England warns of sharpest recession on record*, (7 May 2020): https://www.bbc.co.uk/news/business-52566030 [accessed 30 June 2020]

103 Oral evidence taken before the Economic Affairs Committee, Tuesday 19 May (Session 2019–2021) Q 1 (The Rt. Hon. Rishi Sunak MP)

104 The Food Foundation, *New Food Foundation Survey: three million Britons are going hungry just three weeks into lockdown*, (April 2020): https://foodfoundation.org.uk/new-food-foundation-survey-three-million-britons-are-going-hungry-just-three-weeks-into-lockdown/ [accessed 30 June 2020]

105 HC Debate, 4 May 2020, cols 421-424

106 House of Commons Library, Coronavirus: Impact on the Labour market, Briefing Paper Number 8898, 30 April 2020

strategies)."[107] Food insecurity prevalence is, therefore, a measure of individual or household inability to attain sufficient nutritious food.

67. Until recently, data on the prevalence of food insecurity was not collected routinely in the UK.[108] There are, however, some other measures of food insecurity that were highlighted in our evidence that can be used to estimate its prevalence:

- A 2018 report by the Food and Agriculture Organization (FAO) of the United Nations found that between 2015 and 2017, 2.2 million people in the UK were severely food insecure.[109] A report from the House of Commons Environmental Audit Committee suggested that this represented "the highest reporting level of any EU country, and means that the UK is responsible for one in five of all severely food insecure people in Europe."[110]

- Results from the 2018 Food and You Survey, which found that: "80% of respondents lived in households with high food security, 10% in households classified as marginally food secure, and 10% reported living in households with low or very low food security."[111]

68. Our evidence highlighted the use of food banks as a key indicator of levels of food insecurity. Figures from the Trussell Trust, which runs around 1,200 food bank centres across the UK, indicated both a concerning level of use, and suggested that the reliance on foodbanks was increasing. Figures published by the Trussell Trust figures showed that:

- Between 1 April 2018 and 31 March 2019, the Trussell Trust distributed 1.6 million three-day emergency food parcels. This represents a 19% increase on the previous year;

- In the last five years, food bank use in the Trussell Trust network has increased by 73%.[112]

69. Based on the available evidence and despite the lack of official data on food insecurity, we think it is fair to conclude that there are unacceptable levels of food insecurity in this country. No one should struggle to access the food they need. Evidence from the Food Foundation, LSHTM and SHEFS reached a similar conclusion, stating that:

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107 Evidence and Network on UK Household Food Insecurity, *Too poor to eat: Food insecurity in the UK* (May 2016): https://enuf.org.uk/sites/default/files/resources/foodinsecuritybriefing-may-2016-final. pdf [accessed 30 June 2020]

108 As outlined in paragraph 73, the Government will include new questions on food insecurity in the Family Resources Survey. Data will not be available until 2021.

109 Food and Agriculture Organization of the United Nations, *The State of Food Insecurity and Nutrition in the World, Building Climate Resilience for Food Security and Nutrition* (2018), p 138: http://www.fao.org/3/ I9553EN/i9553en.pdf [accessed 29 June 2020]

110 Environmental Audit Committee, *Sustainable Development Goals in the UK follow up: Hunger, malnutrition and food insecurity in the UK* (Thirteenth Report, Session 2017–19, HC 1491)

111 Food Standards Agency, *The Food and You Survey, Wave 5*, (2019): https://www.food.gov.uk/sites/ default/files/media/document/food-and-you-wave5-combined-report-web-revised.pdf [accessed 30 June 2020]. Wave 5 data collected between June and November 2018. This survey is a repeated cross-sectional study run by the Food Standards Agency based on 2,241 interviews from a representative multi-stage stratified random sample of adults across England, Wales and Northern Ireland.

112 The Trussell Trust, *End of Year Stats*: https://www.trusselltrust.org/news-and-blog/latest-stats/end-year-stats/ [accessed 30 June 2020]

"Due to the lack of standardisation and comprehensive measurement of food insecurity it is difficult to definitively state the prevalence. However, it is clear that food insecurity rates are too high, and despite being the fifth richest economy in the world, the UK has some of the worst rates of food insecurity in Europe."[113]

Box 3: Experiences of food insecurity

In a series of phone calls, facilitated by Sustain and Church Action on Poverty, the secretariat spoke with individuals who have experienced food insecurity. Cath from Newcastle said:

"When you are trying to make meals, you want to make a meal that is going to fill everybody and unfortunately that means you use repetitive ingredients as well. So, for example, to buy frozen vegetable is a lot cheaper because you are getting quantity. So, if I can get three meals out of buying say a frozen bag of onions and peppers, what am I going to use? I'm going to use those packets three times in different meals."

"I don't know anyone who doesn't use what we call the yellow sticker aisle. We all do that. If you're on a budget, you got to do that."

"You used to get your money fortnightly. That's got to last two weeks. You need to make your bills, so your bills come out first, then your shopping. So you want that shopping to be as economical as possible, to last 14 days. In last few days, you may just have to eat once."

Source: See Appendix 5.

COVID-19 and food insecurity

70.   In-depth analysis of the impact of COVID-19 on food insecurity is not yet available but from the existing figures it appears clear that levels of food insecurity have risen sharply in a short space of time.

71.   In April 2020 the Food Foundation commissioned YouGov to conduct an online survey to determine the impact of COVID-19 and lockdown on experiences of food insecurity. Based on the survey, the Food Foundation estimated that: "More than three million people (6%) in Great Britain have gone hungry since lockdown began three weeks ago, reporting that someone in their household has been unable to eat, despite being hungry, because they did not have enough food."[114] Similarly, the Trussell Trust has reported an 81% increase in emergency food bank use during the last two weeks of March 2020 compared to the same period in 2019.[115]

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113   Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy food Systems (SHEFS) (ZFP0073)

114   The Food Foundation, *New Food Foundation Survey: Three million Britons are going hungry just three weeks into lockdown* (April 2020): https://foodfoundation.org.uk/new-food-foundation-survey-three-million-britons-are-going-hungry-just-three-weeks-into-lockdown/ [accessed 30 June 2020]. Food Foundation figures based on online survey that it commissioned YouGov Plc to undertake. The Food Foundation states that: Total sample size was 4,343 adults. Fieldwork was undertaken between 7–9 April 2020. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+). The Food Foundation states that its calculations were made using mid-year population estimates.

115   The Trussell Trust, *Food banks report record spike in need as coalition of anti-poverty charities call for strong lifeline to be thrown to anyone who needs it* (1 May 2020): https://www.trusselltrust.org/2020/05/01/coalition-call/ [accessed 30 June 2020]

72. An increase in food insecurity due to the COVID-19 crisis is not an exclusively British problem. Food banks in Spain and France have reported an increase in food distribution,[116] and the Italian Government has allocated €400 million for food vouchers.[117]

Measuring food insecurity

73. In 2019, the Department for Work and Pensions announced that it would introduce household food insecurity questions to the Family Resources Survey,[118] which it told us would "provide information on household food security, allowing us to investigate drivers and identify the groups most at risk."[119] This followed the introduction of a Private Member's Bill by Emma Lewell-Buck MP calling for the measurement to be introduced.[120] The Government told us that the first data will not be available until 2021.[121]

74. There was criticism within our evidence of the Government's previous failure to routinely collect data on levels of food insecurity. Written evidence from the Government stated that: "There are no existing sources which give us complete, comprehensive information on an annual basis for the UK as a whole" and that the Food Security Assessment was last published as a whole document in 2010.[122]

75. Julia Gault, Deputy Director Labour Market, Families & Disadvantage at the Department for Work and Pensions, referred to food insecurity and its relationship to household income, stating that: "One of the things that is very clear from the existing evidence base is that it is really difficult to get a good handle on that in a robust, analytical way from the data sources that are currently available to us." The Committee's Chair, Lord Krebs, suggested to Ms Gault that:

> "… if you wanted to be critical, it is quite shocking that the Government do not know the basic facts about food insecurity, which is what you are telling us."[123]

76. In response, Ms Gault conceded that: "We need to know more, and action has now been taken since April through the Family Resources Survey. We have been collecting more data to improve our understanding."[124]

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116 '"Hunger Queues" and use of food banks on the rise as Spain struggles to recover from coronavirus', *The Independent* (28 May 2020): https://www.independent.co.uk/news/world/europe/food-banks-spain-hunger-coronavirus-poverty-covid-19-a9536341.html [accessed 30 June 2020] and BBC News, *Coronavirus: Lockdown bites poor as France eases grip* (7 May 2020): https://www.bbc.co.uk/news/world-europe-52557722 [accessed 30 June 2020]

117 'Italy sets aside €400m for food vouchers as social unrest mounts', *The Guardian* (31 March 2020): https://www.theguardian.com/world/2020/mar/29/italy-sets-aside-400m-for-food-vouchers-as-social-unrest-mounts [accessed 30 June 2020]

118 An annual report that provides facts and figures about the incomes and living circumstances of households and families in the UK.

119 Written evidence from HM Government (ZFP0079)

120 Food Insecurity Bill [Bill 136 (2017–19)]

121 Written evidence from HM Government (ZFP0079)

122 *Ibid.* The Food Security Assessment is an analysis of six separate themes of food security, one of which is household food insecurity. It draws from a range of national and international indicators.

123 Q 21 (Lord Krebs)

124 Q 21 (Julia Gault)

77. The decision to measure household food security through the DWP's Family Resources Survey (FRS)[125] was welcomed by campaigners, but concerns were expressed that this move does not go far enough to ensure data on food insecurity is regularly monitored and properly scrutinised. Doubts were also expressed over the level of commitment to making this measurement permanent. We consider that it is crucial that levels of food insecurity are properly monitored and understood, so that the policy to address it can be targeted effectively.

78. A number of respondents suggested that there was a distinct lack of Government action at a policy level that deals directly with food insecurity. Dr Loopstra and Dr Reeves from King's College London suggested that:

> "It is not clear what efforts have been made at the policy level to improve food insecurity in the UK. Based on evidence available, it appears that food insecurity is increasing among low income and vulnerable groups, particularly those reliant on benefits. Changes in administration (i.e. through the implementation of Universal Credit), harsher sanctioning penalties, and loss of entitlements have repeatedly been identified as drivers of food bank use. This evidence has not been acted on by the Government."[126]

79. The notion that food insecurity does not receive the dedicated attention it required was also echoed by the University of York IKnowFood programme, which suggested that: "the Government continues to see food insecurity as an overseas issue, with DFID the only Department to include them in its Single Departmental Plan."[127] The programme also highlighted that "there is no clear ministerial accountability for combatting food insecurity in the UK."[128]

80. There were repeated calls for the Government to strengthen the evidence base on food insecurity to help inform its evaluations of related welfare and health policies. A number of suggestions were made as to how this might be achieved, including:

- Monitoring the impact of food insecurity on health in the UK population by linking measures of food insecurity with indicators of dietary health. Dr Loopstra and Dr Reeves suggested that: "measures of food insecurity need to be integrated and maintained in existing health surveys (e.g. National Diet and Nutrition Survey, or the Health Survey for England)."[129] Such analysis will be important because it remains unclear why food insecurity leads to hunger for some and obesity among others. When asked whether data from the Family Resources Survey would be examined alongside that from the National Diet and Nutrition Survey, Will Quince MP, the Minister for Welfare Delivery at the Department for Work and Pensions said he would: "certainly be looking to sit down with my counterparts in the Department of Health and Social Care, because you are right in your suggestion that we would want to compare the two and then look at the evidence."[130] While this

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125 The Family Resources survey is an annual publication which collects information on income and living conditions from a representative sample of private UK households
126 Written evidence from Dr Loopstra and Dr Reeves (ZFP0065)
127 Written evidence from the University of York IKnowFood programme (ZFP0040)
128 *Ibid.*
129 Written evidence from Dr Loopstra and Dr Reeves (ZFP0065)
130 Q 128 (Will Quince MP)

is welcome, a more robust mechanism for comparison is essential—an informal Ministerial meeting cannot fully explore the relationships between dietary quality and food insecurity.

- A firmer commitment from the Government to robust monitoring of food insecurity over the long-term. Dr Manu Savani from Brunel University London called for: "Robust policy analysis and evaluation that relates food insecurity trends to wider socioeconomic context and reforms."[131] Professor Dominic Harrison called for food insecurity to be elevated to the level of a National Statistic.[132] Similarly, Southwark Council called for: "A nationally agreed definition and measure of food security/insecurity that is repeated at regular intervals to pick up on the impact of substantial policy changes."[133]

- That a food insecurity measurement should be enshrined in legislation. The Labour Hunger Campaign suggested that the Government should: "Enshrine a definition of household food insecurity in law and set government targets to eliminate it." Amendments were also tabled to the Agriculture Bill, seeking the inclusion of a measurement of food insecurity into the Government's measurement of food security which would be mandated by that Bill.[134]

- That policy to address food insecurity should be informed by engagement with people with lived experience. Dr Clare Pettinger and Food Plymouth CIC told us that: "there also needs to be more effective consultation and 'bottom up' involvement (co-production) with communities with lived experience so that their voices can form part of the policy changing and solutions."[135]

- That there should be a dedicated section of the Government that deals with food insecurity, with some calling for a minister with accountability for combatting food insecurity in the UK. The University of York IKnowFood programme recommended that the Government: "appoint a minister with responsibility and accountability for combatting food insecurity within the UK."[136]

81. There is very limited confidence in the Government's current approach to monitoring food insecurity. Household food insecurity must be comprehensively and regularly measured, and subject to parliamentary scrutiny to ensure that trends in food insecurity can be linked to wider socioeconomic contexts and reforms and can inform policy making in other areas such as public health and welfare.

82. ***The relationships between dietary quality and food insecurity must be fully understood. The Government must commit to continuing to***

131 Written evidence from Dr Manu Savani (ZFP0070)
132 Written evidence from Professor Dominic Harrison (ZFP0027)
133 Written evidence from Southwark Council (ZFP0024)
134 Amendment, Mrs Emma Lewell-Buck https://publications.parliament.uk/pa/bills/cbill/58-01/0007/amend/agriculture_rm_pbc_0227.pdf .The Agriculture Bill includes a requirement for the Government to measure and report on UK food security. In this case food security refers to availability, supply sources, supply chain resilience, household expenditure on food, food safety and consumer confidence in food. The proposed amendment would have required the Government to measure food insecurity: "a person's state in which consistent access to adequate food is limited by a lack of money and other resources at times during the year."
135 Written evidence from Dr Clare Pettinger and Food Plymouth CIC (ZFP0033)
136 Written evidence from the University of York IKnowFood Programme (ZFP0040)

run the food insecurity measurement questions currently contained within the Family Resources Survey. To better understand the impacts of food insecurity on diet and related outcomes, the Government must determine how best to collect data on food insecurity and dietary intake in the same individuals.

'Food poverty': a misnomer

83. Key to addressing food insecurity was establishing whether it can be addressed separately from issues of poverty or whether food insecurity arises from poverty. We were told, unequivocally, that food insecurity is a direct result—indeed a symptom—of poverty.

84. The evidence was extremely clear on this point. Alison Garnham of the Child Poverty Action Group told us that: "Food poverty is just an example of a kind of deprivation that results from a lack of income… in many ways, food poverty is not distinct from other types of poverty."[137] Ms Barnard from the JRF agreed: "food poverty is one symptom of poverty."[138] As we have seen, poverty is characterised by a lack of resources. Generally, hunger is due to this same lack, that of financial ability to purchase sufficient food. Ms Garnham said: "There are a number of people in the UK who lack the income to buy the food they need".[139] Evidence from Exeter Foodbank supported this, citing income as the top driver of food bank use.[140]

85. A factor of food poverty (food insecurity) that makes it perhaps more visible than other forms of poverty is that, often, the food budget is the only budget which can be reduced—cuts can be made to a food budget that cannot be made to rent or fuel payments. Helen Barnard told us: "It is quite often one of the first things that people on low income start cutting back on or making trades about. Parents start skipping meals."[141] Food insecurity arises quite logically out of a lack of resources and does not exist in isolation from other kinds of poverty. As Ms Barnard said; "Someone skipping meals is also going to be going without all sorts of other things."[142]

86. It was made very clear that poverty has a significant impact on those living with it. In relation to food insecurity and health, the key areas to emphasise are:

- That poverty prohibits access to resources required for a socially acceptable standard of life;

- That poverty affects emotional state, causing feelings of hopelessness and persistent anxiety. The toll of this can reduce the emotional energy available for important aspects of daily life; and

- That poverty increases the risk of physical and mental health problems.

87. Some evidence we received was distressing and included details of people living in appalling conditions. We were told of parents skipping meals, lying to children and claiming that they had eaten, and children unable to concentrate at school due to physical feelings of hunger. We heard that effects

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137 Q 31 (Alison Garnham)
138 Q 31 (Helen Barnard)
139 Q 31 (Alison Garnham)
140 Written evidence from Exeter Foodbank (ZFP0059)
141 Q 31 (Helen Barnard)
142 *Ibid.*

ranged from debilitating physical feelings of hunger to social isolation, and a decreased ability to concentrate or make decisions. Magic Breakfast indicated some of the effects of hunger upon children: "School age children with severe hunger were more likely to experience stressful life events, had higher parent-reported anxiety scores and were more likely to have behavioural problems than children with no experience of hunger."[143]

88.   The mental and emotional aspects of poverty were also described to us. Helen Barnard described the effect of poverty as being: "Shut out from normal life." She said:

> "There is [also] very often a sense of there being no way out. We quite often talk about this feeling of hopelessness. One of the parents we work with described it as like being stuck on a hamster wheel: you are running and running but never getting anywhere. You cannot give the kids the things that we know all kids should have to have a good start in life."[144]

89.   Ms Barnard told us that these pressures could lead to a 'tunnel vision' effect: "If you are really anxious and worried about things, you will psychologically focus in on a very small number of crucial things … those things you are focusing on cannot fail."[145] She described this narrowing in focus as a reduced 'emotional bandwidth'.

90.   Exeter foodbank provided us with some quotes from their foodbank users to illustrate what living with food insecurity means for people:

> "I am on my own with 2 children and came to the foodbank today because it's the end of the school holidays. I have a part-time job—my children needed new school uniforms and shoes so we had no money left for food. We never have money for extras."

> "I came to the foodbank today because we had no food, no money and we are in debt. I had an operation and was off work from October until January. I went back to work for a few hours a day and I now work 25 hours a week. While I was off work, I accumulated debt—rent, council tax and water rates. I was down and felt embarrassed about my situation."

> "I've been ill for a couple of years and was made redundant due to my long-term sickness. I have really struggled getting help and have become very demoralized and let myself go and stopped caring. A friend forced me to come for help and I feel better being given some food and a friendly ear with a cup of tea."[146]

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143 Written evidence from Magic Breakfast (ZFP0076)
144 Q 37 (Helen Barnard)
145 Q 40 (Helen Barnard)
146 Written evidence from Exeter Foodbank (ZFP0059)

Box 4: Experiences of food insecurity

In a series of phone calls, facilitated by Sustain and Church Action on Poverty, the secretariat spoke with individuals who have experienced food insecurity. Monica from Oxford said:

> "Hunger does impact on your mental health and on your tiredness."

Tia from Blackburn with Darwen said:

> "You know everyone's struggling but you just don't know how much everyone is struggling because no one wants to talk about it. An older person who is struggling doesn't want to talk about it because they feel embarrassed or they're embarrassing their kids. Some people don't want to talk about it in Darwen because there is such a stigma."

Source: See Appendix 5.

Hunger and food banks

91.   Food banks work largely on a donation basis. People in need of emergency food assistance are given vouchers by care professionals, which can be exchanged for non-perishable food parcels from food banks. Many food banks provide additional support, for example in helping people understand and access the benefits they are entitled to. Our evidence acknowledged the vital role that food banks play, but emphasised strongly that food banks exist to plug a hole in the social security system. Evidence from Blackburn with Darwen Council, for example, stated: "Food banks should have NO role in a 21st century Britain."[147] Dr Dave Beck from the University of Salford suggested that the existence of food banks relieves Government of the responsibility to protect the most vulnerable in society. He said they acted as: "a failsafe for the government so that they can now step-back from their responsibility and hand this provision over to the Big Society of volunteers … a stick-plaster approach".[148] Dr Sinéad Furey described food banks as "successful failures": successful since they continue to grow, and failures because: "such initiatives distract from the underlying issues of food insecurity".[149]

92.   Food banks, and food aid organisations in general, agree that there should be no need for them. It is, for instance, the policy of the Trussell Trust—the UK's largest group of food banks—to put themselves out of business by working together to "challenge the structural economic issues that lock people in poverty, and campaign to end the need for food banks in the UK."[150]

Box 5: Experiences of food insecurity

In a series of phone calls, facilitated by Sustain and Church Action on Poverty, the secretariat spoke with individuals who have experienced food insecurity. Penny from Newcastle said:

> "It's also a pride thing. Just because, you know, just because you've got no money doesn't' mean to say you've got no pride."

Source: See Appendix 5.

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147 Written evidence from Professor Dominic Harrison and Emma Savage (ZFP0027)
148 Written evidence from Dr Dave Beck (ZFP0001)
149 Written evidence from Dr Sinéad Furey (ZFP0019)
150 The Trussell Trust, *What we do*: https://www.trusselltrust.org/what-we-do/ [accessed 30 June 2020]

Holiday Hunger

93. Witnesses raised concerns about the levels of holiday hunger, when children who would normally receive free school meals during term-time go hungry during the school holidays. We were told that around 3 million children are affected by holiday hunger.[151] Garry Lemon of the Trussell Trust explained the reasons behind this:

> "When you are on such a low income, that pound or two a day that you are now having to spend on food—which would have been free school meals—can be utterly ruinous to people's finances when they are already surviving on so little."[152]

94. The Government has provided some funding to address the issue of holiday hunger, and in June 2020 it agreed to extend the National Voucher Scheme for the 2020 summer holiday.[153] We welcome these interventions and have addressed holiday hunger in greater depth in Chapter Four: Government Food Programmes. It is worth stating, however, that it is not acceptable that for three million children, the only thing standing in the way of hunger is a school meal.

95. Like the use of food banks, the prevalence of hunger during holidays is an indication that some people in this country simply do not have enough money to feed themselves. Food aid organisations, including holiday hunger initiatives do excellent work (and many provide much more than food), but they should not need to exist to ensure that people can eat. We agree with the evidence of the Leeds Food Aid Network which said:

> "It brings considerable shame on this country that we are talking about initiatives to address holiday hunger whilst ignoring the fact we live in a system that allows the children of the most vulnerable sectors of our nation to face holiday hunger in the first place … Addressing poverty at its root is the only way to ensure these initiatives, that are either costly or rely on the goodwill of the community, are no longer required."[154]

96. **The need for charitable food aid is a clear sign that the welfare system is failing to provide adequate support to people in the lowest income groups. The Government should not be reliant on charitable food aid to plug the holes in the welfare system.**

Universal Credit and hunger

97. While this report cannot address all of the underlying causes of poverty, one issue was highlighted to us as being very directly linked to people struggling to afford food and recourse to food banks: Universal Credit. Several witnesses referred to Trussell Trust data indicating that food bank use had risen by 48% in areas where Universal Credit had been rolled out for two years.[155]

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151 Q 42 (Alysa Remtulla), written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine, and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073) and written evidence from Church Action on Poverty, The Food Foundation, The Independent Food Aid Network, Nourish Scotland, Oxfam GB and Sustain (ZFP0031)

152 Q 35 (Garry Lemon)

153 Department for Education, *Guidance: COVID Summer Food Fund* (30 June 2020): https://www.gov.uk/guidance/covid-summer-food-fund [accessed 30 June 2020]

154 Written evidence from the Leeds Food Aid Network (ZFP0018)

155 The Trussell Trust, *Universal Credit and Food Banks*: https://www.trusselltrust.org/what-we-do/research-advocacy/universal-credit-and-foodbank-use/ [accessed 30 June 2020]. See also written evidence from the Leeds Food Aid Network (ZFP0018)..

We could not ignore these sobering statistics, or the story they told about, in particular, the five-week wait.

98. Recipients of benefits are transferred from the old (legacy) benefits system to Universal Credit (UC) when there is a change in life circumstance. A minimum five-week wait applies before UC is paid to a recipient (UC is paid in arrears, monthly). This wait comprises an assessment period of a full calendar month, after which the pay date will be within seven calendar days. We were told that: "It is not possible to award a universal credit payment as soon as a claim is made, as the assessment period has to run its course before the award of universal credit can be calculated".[156] This choice to pay monthly benefits in arrears was described to us by the Minister for Welfare Delivery, Will Quince MP as being "more akin to the world of work".[157] In April 2017, around 85% of people employees received pay in monthly or four-weekly periods,[158] leaving a significant number of workers who would usually receive weekly or fortnightly payments: the "world of work" envisaged by the Department is not necessarily representative of the reality of many people's working lives.

99. In February 2019, Amber Rudd MP, the-then Secretary of State for the Department for Work and Pensions, admitted that the five-week wait may have led to an increased use of foodbanks.[159] The Department has since introduced an advance to cover the waiting period, which is deducted from future payments in instalments. The Trussell Trust has described this as presenting a choice between: "destitution now or destitution later. If you take the advance, that money is immediately clawed back out of your already cut and too small universal credit monthly allowance, or you forgo the advance and fall into debt and further poverty until you can bridge that five-week gap."[160] The wait, and the repayment of advances still creates significant problems for the individuals receiving it.

100. Julia Gault told us that people usually begin using food banks after some manner of life crisis.[161] Our evidence showed that a five-week wait for UC has often represented this crisis. The Exeter Foodbank stated that many new recipients:

> "Simply do not have the financial resilience to cope with the 5 week wait between making a UC claim and receiving first payment. Sadly, a high proportion of these new referrals go on to experience chronic food insecurity and repeated foodbank referrals due to arrears, debts and deductions incurred during the initial waiting period."[162]

A volunteer in another food bank told us that: "every single client who has been put on UC stated they are now in more debt than they were before… Most are in debt to family or friends and know that even when they do get

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156 Q 129 (Will Quince MP)

157 *Ibid.*

158 Office for National Statistics, Annual Survey of Hours and Earnings (ASHE): Proportion of all employee jobs with weekly, fortnightly, four weekly and monthly pay periods, UK, April 2017: (November 2017): https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/adhocs/007746annualsurveyofhoursandearningsasheproportionofallemployeejobswithweeklyfortnightlyfourweeklyandmonthlypayperiodsukapril2017 [accessed 30 June 2020]

159 HC Deb, 11 February 2019, col 594

160 Q 33 (Garry Lemon)

161 Q 26 (Julia Gault)

162 Written evidence from Exeter Foodbank (ZFP0059)

paid, their payment won't be enough to repay their debt."[163] It has also been made clear that foodbanks have often recorded changes or delays to benefits as significant drivers of usage.[164]

101. We welcome the proposed extension of the repayment period and a reduction on the repayment cap—but these changes are proving insufficient. The Government plans to extend the repayment term for advances from 12 months to 24 months, and that the standard deduction cap will be reduced from 30% to 25%. This change will not take effect until October 2021.[165] Minister for Welfare Delivery, Will Quince MP, told us that, in relation to advances, "the repayment of that advance over a 12 month period is currently in the region of £50 per calendar month".[166] He explained that the reduction will further lower this to around £30 per calendar month. For many people, however, £50 per calendar month is a significant amount of money. There is not a "spare" £50, or indeed £30 built into the Universal Credit entitlement: it is likely that people paying this to the Department will be going without something. It is worth noting here that the mean average weekly household spend on food and non-alcoholic drinks is £61.90.[167]

102. The House of Lords Economic Affairs Committee is conducting an inquiry into whether UC's design and objectives reflect the reality of life on low incomes,[168] and the House of Commons Work and Pensions Committee is undertaking an inquiry into possible alternatives and alterations for the five-week wait.

103. Possible alterations published in advance of the Work and Pensions Committee's inquiry include:

- Scrapping the five-week wait for all claimants: for example, by making the Advance non-repayable;

- Offering non-repayable Advances to some claimants: for example, those considered vulnerable;

- Allowing more flexibility for the start of a claim to be backdated;

- Extending run on payments to cover all legacy benefits;

- Substantially reducing the rate at which Advance Payments—the main existing mitigation measure—are paid back, to help claimants better manage their money; and

- Paying UC two-weekly, like many legacy benefits, rather than monthly.[169]

163 Written evidence from Church Action on Poverty, Food Foundation, the Independent Food Aid Network, Nourish Scotland, Oxfam GB, and Sustain (ZFP0031)
164 Written evidence from Dr Bowe, Dr Wakefield, and Nottingham Civic Exchange (ZFP0078) and Consensus Action on Salt, Sugar and Health (ZFP0053)
165 Supplementary written evidence from HM Government (ZFP0098)
166 Q 129 (Will Quince MP)
167 Office for National Statistics, *Family spending in the UK: April 2018 to March 2019*: https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/bulletins/familyspendingintheuk/april2018tomarch2019 [accessed 30 June 2020]. Mean average weekly spend equal to the total reported weekly expenditure of households divided by the number of households.
168 Economic Affairs Committee, 'The economics of Universal Credit inquiry': https://www.parliament.uk/economics-universal-credit [accessed 30 June 2020]
169 Work and Pensions Committee, 'Universal Credit: the wait for a first payment', : https://committees.parliament.uk/work/135/universal-credit-the-wait-for-a-first-payment/ [accessed 30 June 2020]

104. ***The five-week wait for Universal Credit presents acute difficulties and requires urgent overhaul. While we cannot anticipate the findings of two Parliamentary reports dedicated to this topic, the Government must fully respond to the reports of both Committees. A replacement scheme must have regard to:***

> - ***The recommendations of the House of Commons Work and Pensions Committee and the House of Lords Economic Affairs Committee;***
>
> - ***Analysis of the impact of repayments over a period of time on the ability to afford a healthy diet;***
>
> - ***The imperative to avoid a situation where a person awaiting benefits has no choice but to visit a food bank;***
>
> - ***Analysis of data pertaining to the increase in UC claims following the outbreak of COVID-19;***
>
> - ***The possibility that different groups of claimants may require different arrangements for advances and their repayment; and***
>
> - ***A continual and effective system of training to help claimants manage their money.***

People with no recourse to public funds

105. We were told that people with no recourse to public funds (NRPF) are particularly vulnerable to hunger. Professor Greta Defeyter, Professor of Psychology at the University of Northumbria, explained that some particularly vulnerable groups were excluded from measurements of food insecurity: "We have thousands of extremely vulnerable children who are entirely excluded from these figures because they are undocumented or have no recourse to public funds."[170] As demonstrated above, the Government has an extremely limited understanding of the scale of food insecurity: the understanding is particularly weak in the case of some of the most vulnerable groups.

106. Written evidence from Exeter Foodbank stated: "EFB's experience suggests that asylum-seekers, refugees, and others affected by recent changes to habitual residency legislation, are at high risk of prolonged food insecurity."[171] Southwark food bank recorded that in 2017–18, 16% of their referrals were due to a lack of recourse to public funds.[172]

107. In the case of people with no access to public funds, food banks are sometimes the only means of subsistence. Exeter Foodbank gave an example:

> "Between 2013–2019, EFB provided continuous weekly food parcels to a lady and her young son whilst her complex immigration status was resolved. Throughout this period, she had no recourse to public funds and was not allowed to work; her sole source of income was a small subsistence grant of £10 per week from a local charity.

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170 Q 38 (Professor Greta Defeyter)
171 Written Evidence from Exeter Foodbank (ZFP0059)
172 Written evidence from Cllr Evelyn Akoto, Cabinet Member for Community Safety and Public Health, Southwark Council (ZFP0024)

Foodbank parcels, although nutritionally balanced, are not designed for long-term use; they are comprised of pre-dominantly non-perishable foods, and lack variety. Nevertheless, for six years, they remained the primary means through which this family could manage to eat and survive."[173]

108. The weeks following the outbreak of COVID-19 saw a number of programmes to distribute food where it was necessary, including the temporary extension of Free School Meal provision to some groups who have no recourse to public funds.[174] These programmes demonstrate a public and political will to ensure that everyone can access food.

109. **We note that a group of the most vulnerable people, those with no recourse to public funds, are conspicuously absent from policy discussions on food insecurity.**

110. *We recommend that the Government produce an action plan to ensure that the gathering of data on food insecurity includes and records the situations of those with no recourse to public funds. Urgent planning must begin now to establish a Government-funded programme to ensure that all those with no recourse to public funds are able to access sufficient, nutritious food.*

Difficulty accessing a healthy diet

111. Problems of the most severe type of food insecurity: those leading to hunger, were our starting point. Hunger, however, is one end of a spectrum of food insecurity. It is crucial that we understand different aspects of food insecurity, and address the wider issue of access to a healthy diet.

112. Statistics on diet-related ill health, outlined in Chapter 2, demonstrate that there is a serious problem with health inequalities between rich and poor in the UK. This situation is not inevitable; it is, in part, the product of an increased difficulty in accessing a healthy diet for those in the poorest groups. This section identifies the factors that cause this situation. It is distinct from Chapter 4, the Food Environment, which identifies a series of factors which, together, create a deeply unhealthy backdrop for everybody.

113. We were told of the barriers that exist for lower income groups to access a healthy diet, which fall into three broad categories:

  •   The affordability of food. Some research has shown that healthy food is three times as expensive as less healthy food, calorie for calorie. The Government's guidance on healthy diets—the Eatwell Guide—was said to be unaffordable for many families (including those receiving universal Credit). Healthy food can also carry a higher risk of waste, resulting in a greater financial risk than unhealthier foods.

  •   Practical considerations. We were told that people with lower incomes were sometimes without access to physical cooking equipment, and that there were more likely to be additional inhibitive costs to preparing healthy foods (such as energy costs). We also heard evidence to suggest

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173 Written evidence from Exeter Foodbank ([ZFP0059](#))

174 Department for Education, *Coronavirus (COVID-19): free school meals guidance for schools* (April 2020): https://www.gov.uk/government/publications/covid-19-free-school-meals-guidance/covid-19-free-school-meals-guidance-for-schools [accessed 30 June 2020]

that for some, accessing food shops was expensive or difficult, as they might have to travel by car or expensive public transport, to avoid this many are limited to small convenience shops where prices can be higher.

- • 'Emotional bandwidth'. Poverty can place demands and stresses upon individuals and families. The priority for many people is to ensure that there is enough food, meaning that there may be limited available mental energy to make choices and dedicate time and effort to cooking and preparing food which is nutritionally balanced.

114. We were disappointed to note that, when asked about widening health inequalities, although the Government recognised the relevance of the food environment, their answer contained only one mention of disparities and one targeted intervention (Healthy Start Vouchers).[175] We feel this demonstrates a lack of Government recognition of the increased difficulty for lower income groups in accessing a healthy diet.

Affordability of healthy diets

115. One question that arose frequently throughout this inquiry was: is food too expensive? There was a clear consensus that, on the contrary, the current price of food does not reflect "the real cost".[176] Henry Dimbleby pointed to a variety of NGO reports identifying the true cost of food as: "anything from 50% more to just a bit more to twice as much, depending on the agenda of the person who has done the report."[177]

116. Between April 2018 to March 2019, the mean average household[178] spend on food and non-alcoholic drink was £61.90 per week, (see Figures 6 and 7) representing 10.6% of expenditure,[179] significantly less than the average spend across all EU countries, which was 12.2%.[180] The food consumed in the UK is the cheapest in Western Europe. Indeed, according to the EU statistical body Eurostat, it costs 8% less than the EU average.[181]

175 Supplementary written evidence from HM Government (ZFP0098)
176 Q 76 (Professor Andrew Balmford)
177 Q 104 (Henry Dimbleby)
178 Data from the Living Costs and Food Survey which is a sample survey of private household's expenditure. Figures provided are mean averages of expenditure (equal to the total weekly expenditure of households divided by the number of households). As the number of individuals in households differs, the data does not represent 'an average household'. (The mean average number of individuals in a household is 2.37). Office for National Statistics, *Dataset: Families and Households*, (15 November 2019): https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/datasets/familiesandhouseholdsfamiliesandhouseholds [accessed 30 June 2020]
179 Office for National Statistics, *Family spending in the UK: April 2018 to March 2019*, (19 March 2020): https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/bulletins/familyspendingintheuk/april2018tomarch2019 [accessed 30 June 2020]
180 European Commission, *How much are households spending on food?*, (December 2018): https://ec.europa.eu/eurostat/web/products-eurostat-news/-/DDN-20181204-1 [accessed 30 June 2020]
181 Eurostat, *File: Table 1 Price level indices for food, beverages and tobacco*, 2017: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Table1Price_level_indices_for_food,_beverages_and_tobacco,_2017_(EU-28%3D100).png [accessed 30 June 2020]

Figure 6: The 13 main categories of average weekly household expenditure, UK, 2018/19

Transport: £80.20

Housing, fuel and power: £79.40

Other expenditure: £77.20

Recreation and culture: £76.90

Food and non-alcoholic drinks: £61.90

Miscellaneous goods and services: £45.50

Household goods and services: £40.80

Restaurants and hotels: £51.30

Clothing and footwear: £24.40

1

Alcoholic drink, tobacco and narcotics: £13.00

Health: £8.00

2

Note: 1.Communications, £21.30, 2. Education, £5.70

Source: Office for National Statistics, Family spending in the UK: April 2018 to March 2019 (19 March 2020):
https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/bulletins/
familyspendingintheuk/april2018tomarch2019 [accessed 30 June 2020]

Figure 7: Average weekly household expenditure on the 33 main categories of foods, UK, 2018/19

1. Edible ices [lollies] and ice cream: £0.80
2. Confectionary products: £0.80
3. Margarine, other vegetable fats and peanut butter: £0.60
4. Lamb (fresh, chilled or frozen): £0.60
5. Other fresh, chilled or frozen fruits: £0.50
6. Pork (fresh, chilled or frozen): £0.50

7. Sugar and sugar products: £0.40
8. Pasta: £0.40
9. Cooking oils and fats: £0.30
10. Jams, marmalades: £0.30
11. Preserved fruit and fruit-based products: £0.20
12. Dried vegetables: £0.10

Source: Office for National Statistics, Family spending in the UK: April 2018 to March 2019, (19 March 2020): https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/bulletins/familyspendingintheuk/april2018tomarch2019 [accessed 30 June 2020] Figure totals £56.60 and excludes £5.30 spent on non-alcoholic drinks.

What is the cost of a healthy diet?

117. Much of our evidence pointed to research suggesting that healthy foods cost more than less healthy foods. Public Health professionals from Blackburn with Darwen Council wrote that: "Calories from healthy foods consistently cost more than those from less healthy foods."[182] Research by the Food Foundation has found that, calorie for calorie, it is three times more expensive to eat a healthy diet than an less healthy diet.[183]

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182 Written evidence from Professor Dominic Harrison, Director of Public Health and Emma Savage, Speciality Registrar in Public Health, Blackburn with Darwen Council (ZFP0027)
183 The Food Foundation, *Affordability of the UK's Eatwell Guide* (September 2018): https://foodfoundation.org.uk/wp-content/uploads/2018/10/Affordability-of-the-Eatwell-Guide_Final_Web-Version.pdf [accessed 30 June 2020]

118.   NHS analysis of this report commented that because healthier foods tend to have a much lower energy density than less healthy foods, cost comparison on the basis of calories may not always give a realistic comparison of food you want to buy—a packet of ginger biscuits will give you around the same number of calories as 30 cucumbers.[184]

The cost of the Eatwell Guide

119.   The Government's guidance on healthy diets is the Eatwell Guide. Issued by Public Health England, the Guide breaks down food into five groups and advises on the proportion of different groups that should be consumed over the course of a day or a week (see figure 8). The five categories are 'fruit and vegetables'; 'potatoes, bread, rice, pasta and other starchy carbohydrates'; 'beans, pulses, fish, eggs, meat and other proteins'; 'dairy and alternatives' and 'oils and spreads'. Foods high in fat, salt and sugar are listed separately from the former five categories and should be eaten "less often and in smaller amounts".[185]

Figure 8: The Eatwell Guide
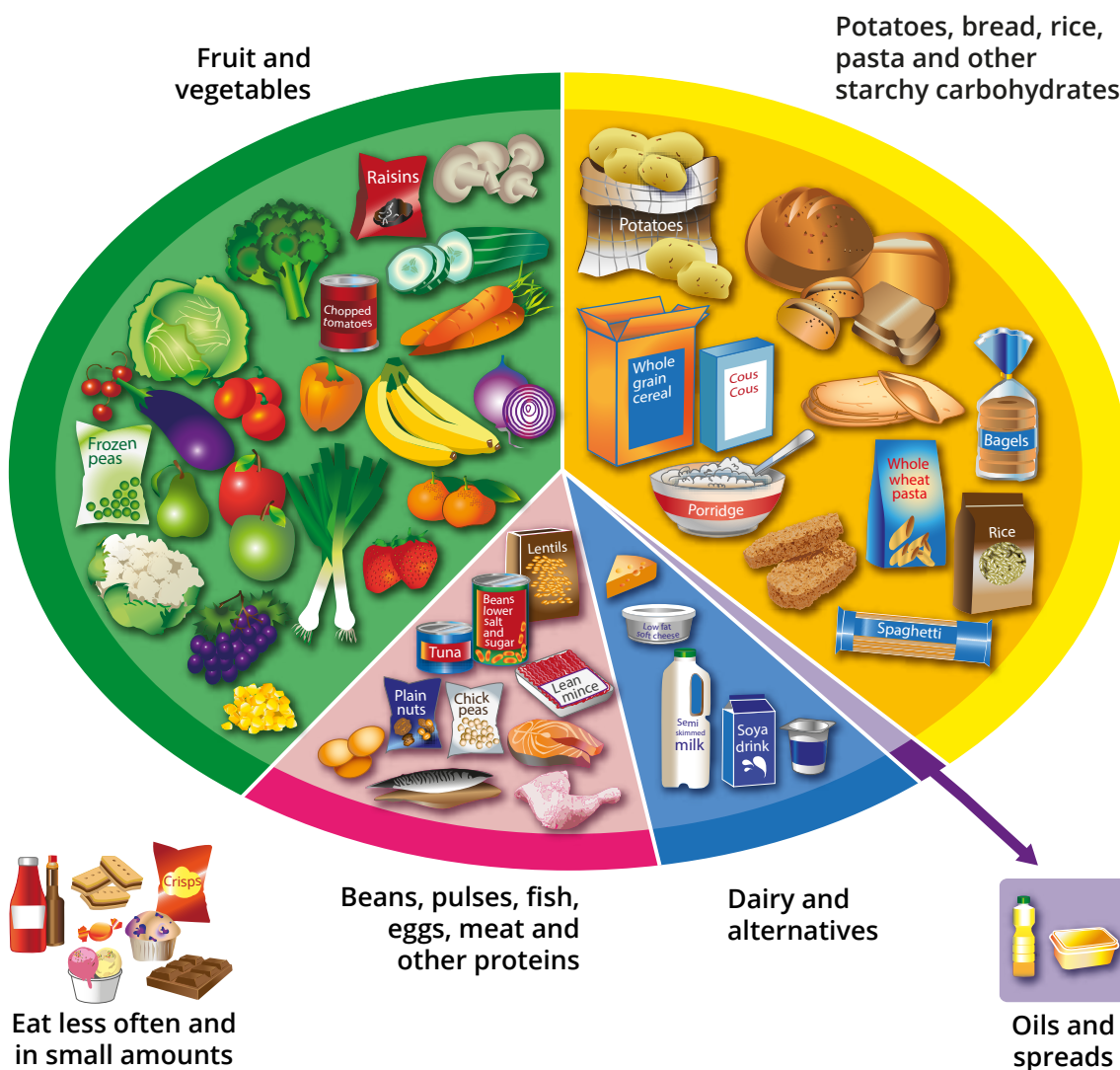
Source: NHS, The Eatwell Guide: https://www.nhs.uk/live-well/eat-well/the-eatwell-guide/ [accessed 30 June 2020]

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184 NHS, 'Healthy foods expensive' claim is unrealistic', (October 2014): https://www.nhs.uk/news/food-and-diet/healthy-foods-expensive-claim-is-unrealistic/ [accessed 30 June 2020]
185 NHS, *The Eatwell Guide*: https://www.nhs.uk/live-well/eat-well/the-eatwell-guide/ [accessed 30 June 2020]

120. In its evidence to the Committee, the Government highlighted a study, commissioned by Public Health England that looked at the cost of achieving the Eatwell Guide when it was launched in 2016. The report estimated that the diet would cost £5.99 per adult per day, or £41.93 per week. [186] The report concluded that to achieve the dietary recommendations as set out in the Eatwell Guide "would require large changes in the average diet of UK adults" but "would not lead to significant changes in the price of the diet."[187]

121. These findings have been questioned: the report itself acknowledges that its conclusion that there would be no price increase associated with the Eatwell Guide scenario diet was "not generally supported by the literature." The report is based on a modelled scenario at population level, did not adjust for the popularity of different brands, and did not allow for the cost of preparing products from scratch: "the 'Eatwell Guide' scenario is a modelled diet rather than a real healthy diet that is achieved by a subgroup of the population."[188] The Food Foundation's own analysis of the cost of the Eatwell Guide also referenced this report, and added another important point—the estimated cost of £41.93 a week is: "calculated on a per portion basis (for example, the cost of a single portion of bread) rather than how much a person would need to spend to buy the food in question."[189]

122. The Food Foundation's assessment of the cost and affordability of the Eatwell Guide involved an analysis of the Living Costs and Food Survey and the Family Resources survey, and considered the estimated cost of an 'Eatwell' diet: "in relation to UK household expenditure on food and non-alcoholic drinks, and to disposable household income."[190] The Food Foundation estimate of the weekly Eatwell cost per household was determined based on household composition.[191]. The analysis calculated that only 53% of households spent at least enough to follow the Government's Eatwell guidance.[192] The report also stated that: "the poorest decile of UK households would need to spend 74% of their after-housing disposable income on food to meet the cost of the Eatwell Guide compared to just 6% in the richest decile."[193] The Food Foundation's findings suggests that the Government should seek a fuller understanding of whether its dietary guidance is affordable.

123. Evidence from advocacy groups and food banks argued that meeting the costs of the Government's Eatwell guidance was unrealistic for many. Nourish Scotland, for example argued that following the Eatwell guide would bring "significant opportunity costs."[194]

186 Peter Scarborough, Asha Kaur, et al., 'Eatwell Guide: modelling the dietary and cost implications of incorporating new sugar and fibre guidelines', *British Medical Journal Open,* doi:10.1136/bmjopen-2016013182 (November 2016): https://bmjopen.bmj.com/content/bmjopen/6/12/e013182.full.pdf

187 *Ibid.*

188 *Ibid.*

189 The Food Foundation, *Affordability of the UK's Eatwell Guide*, (September 2018) p 5: https://foodfoundation.org.uk/wp-content/uploads/2018/09/Affordability-of-the-Eatwell-Guide_Final_Web-Version.pdf [accessed 30 June 2020]

190 Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073)

191 The Food Foundation, *Affordability of the UK's Eatwell Guide*, (September 2018): https://foodfoundation.org.uk/wp-content/uploads/2018/09/Affordability-of-the-Eatwell-Guide_Final_Web-Version.pdf [accessed 30 June 2020]

192 *Ibid.*

193 Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073)

194 Written evidence from Nourish Scotland (ZFP0064)

124. **For many in low income groups, meeting the costs of the Eatwell Guide is unrealistic. Given the sizeable proportion of disposable income that many in lower income groups would have to spend to meet the recommendations of the Eatwell Guide, it is wholly unsurprising that so few people are doing so.**

125. The Food Foundation argued that any approach to formulating an overarching strategy for the food system must be underpinned by an accurate understanding of what a healthy and sustainable diet is and what it costs. Evidence from the Food Foundation, LSHTM and SHEFS argued that the government's dietary guidelines, and its assessment of what a healthy, sustainable diet costs, should be given a legal status and should be updated annually. It was suggested that this could have two key outcomes:

    (a) That a fuller understanding of the cost of healthy, sustainable diets could be used as a reference point for other government interventions. It was suggested, for example, that the cost of diet could be factored into calculations in other policy areas, such as calculating welfare payments, the level of the minimum wage, school meal provision, or hospital food, for example.[195]

    (b) By having a clear vision of what a healthy and sustainable diet is, it was suggested that the Government could set standardised health and sustainability targets and require business to report against them, using this data to drive improvements and cross-government action in a multitude of areas.[196]

    Anna Taylor, Executive Director at the Food Foundation, explained that:

    " … we must have a notion of what a healthy and sustainable diet is and what it costs. That, in turn, should feed through to other areas of government intervention."

    "You would then ensure that the budget that you are allocating to school meals makes reference to the fact that you have that in place. You would make sure that your public procurement of food across the piece made reference to that. You would think about it in respect of minimum wage levels and, therefore, the cost of diet in relation to the cost of living. In other words, you create a reference point against which it feeds through to other areas of policy. Similarly, of course, you would make sure that benefit levels were sufficient to cover the cost of eating a healthy diet. At the moment, we have gross discrepancies, particularly for the poorest 20% of the population, where it becomes extremely difficult to afford a healthy diet. We need something in place to protect those households, in particular."[197]

126. We were convinced by the argument that the Government needs a reference point to use to co-ordinate its approach to ensuring everyone has access to a healthy and sustainable diet, and to ensure that this aim is embedded into related policy decisions.

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195 Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073)
196 *Ibid.*
197 Q 2 (Anna Taylor)

127. ***The Government should be fully aware of the cost of eating the diet it recommends, and the ability of different demographic groups to access this diet. To underpin any national food strategy, the Government must, in its 2021 review of benefits rates, commit to giving its dietary guidance—the Eatwell Guide—a firm place in the development of policy.***

128. Written evidence from the Government stated that income-related benefit rates: "Derive from a review in the 1980s"[198] rather than being based on a "single mathematical calculation or historic set of rules."[199] This means that benefits are not based on an understanding of how much things cost or a representative household budget. Julia Gault confirmed this and stated that: "we do not say, 'We are assuming you are going to spend this much money on food and this much money on other things'".[200]

129. Given the enormous economic cost to the NHS and wider society of failing to encourage healthy diets, we find it puzzling that the Eatwell Guide is not used by the Government in the calculation of benefit payment rates. Ensuring that the large (and, recently, dramatically increasing) number of people in receipt of universal credit are able to afford a healthy diet could be a sensible economic step. If the benefits system does not take account of the cost of a healthy diet; it is not clear how households receiving Universal Credit can achieve it.

130. We accept the premise that the benefits system must not prescribe how people budget their money. Household spend is a matter for individual households to decide. It is also clear that cost is not the sole issue in access to a healthy diet: many households who can afford to consume according to the Eatwell Guide do not do so. There is no guarantee that a rise in benefit rates to incorporate the cost of a healthy diet would result in households deciding to spend it on healthy food. However, in order for households to meet the Eatwell recommendations, they have to be able to afford it.

131. The Eatwell Guide is, as the name suggests, guidance. It is not included, for example, in calculations on social policy. The Eatwell Guide is currently nothing more than an aspiration; and as a nation, we are comprehensively failing to reach it. Anna Taylor argued strongly for: "a set of metrics in law against which we track national progress that embed the Eatwell Guide within them."[201] She argued that embedding the Eatwell Guide in social policy, including in the benefits system, would provide some protection to the poorest families.

132. ***The Government should embed consideration of the cost of the Eatwell Guide into calculations of benefit payment rates.***

133. ***We recommend that the Government should undertake a fuller assessment of the cost of a healthy and sustainable diet. The cost of the Government's dietary guidance should be built in as a reference point to consideration of government interventions, including those relating to welfare and public food provision.***

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198 Supplementary written evidence from HM Government (ZFP0098)
199 *Ibid.*
200 Q 23 (Julia Gault)
201 Q 8 (Anna Taylor)

Risks and priorities

134. One element of the cost of food for families that is sometimes forgotten is the element of financial risk involved in purchasing healthier food. Put simply, it is financially dangerous to buy something "healthier" that family members may not eat; it may be wasted, and you may have to buy something to replace it. Healthier food may also go out of date more quickly.

135. We heard repeatedly that unfamiliar food can hold an inhibitive financial risk. It can be much safer to purchase less healthy foods which will be eaten, and will leave the consumer feeling full. Dr Christina Vogel, Principal Research Fellow in Public Health Nutrition at the University of Southampton, told us that women she had surveyed on lower incomes: "Often have to go through a whole lot of wastage before they even get to the point where their children will eat it, so they much prefer to buy things that they know their children will eat."[202] This approach is a sensible financial decision, ensuring that money is not wasted on food that will not be eaten.

136. Aversion to food waste is necessary on a small budget. Tom Andrews, Programme Manager at Sustainable Food Cities pointed out that many less healthy products are more processed and have a longer shelf life. He described people on a low budget as being: "often worried about wasting food, so they want to buy things that they can use and keep for a long period".[203]

137. For many, the priority is to ensure that they and their families feel full when they have eaten. Helen Barnard described a hierarchy of needs pyramid for food: "The first thing you need from food is the feeling of fullness. On top of that you put health and energy and so on."[204]

138. We received some evidence that suggested that less healthy foods were considered to be more filling. Dr David Beck described a perception that fruit and vegetables are seen as: "less filling and more expensive when compared with a high sugar alternative which is nutritionally less dense and carries empty calories."[205] Evidence from the Food Foundation, LSHTM and SHEFS explained that this led to people purchasing: "food that will be filling rather than nutritional. Families will be more likely to purchase foods that they know their children will eat, that are convenient and where there will be minimal food waste."[206] After all: "If you only have £5 to feed your family, you cannot risk trying another product (like a vegetable) in case children won't eat it—what will you then feed them? When faced with hunger, food becomes about being the most filling, not the most nutritious."[207]

139. Leeds Food Aid Network raised a final, social element that we found compelling: that buying tasty food can be one of few options to make children happy. "Parents living on low income talk about giving their children rewarding foods is often the only nice thing they can do for their children."[208] The low price of some delicious food such as pastries, deep fried chicken,

202 Q 13 (Dr Christina Vogel)
203 Q 46 (Tom Andrews)
204 Q 34 (Helen Barnard)
205 Written evidence from Dr Dave Beck (ZFP0001)
206 Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073)
207 Written evidence from Bags of Taste (ZFP0029)
208 Written evidence from Leeds Food Aid Network (ZFP0018)

cakes or sugary drinks is much more financially realistic than many other, non-food items that children ask for.

140. **For many, particularly those in the lowest income groups, food choices are about whether they will produce a feeling of being satiated. Choices made by people in lower income groups to prioritise food that is reliably satiating and prevents waste over a nutritionally balanced diet should be understood as a reasonable response to the economic reality they face.**

Practical barriers to accessing a healthy diet

141. Difficulties in producing healthy diets are not limited to the price of food. For people in lower income groups, considerations such as equipment, energy costs, limited space to store bulk purchases, and the cost of travelling to cheaper shops are very real barriers to consuming healthy diets.

142. Some people on lower incomes do not have the physical cooking equipment needed to produce nutritious food. Helen Barnard explained that some people may not have access to practical things required to provide healthy meals such as fridges or ovens.[209] Bags of Taste explained that even when these are present they may not work very well, and described the difficulty of lacking other equipment such as pans and knives.[210] Exeter Foodbank outlined the example of a woman in emergency social housing who did not have access to a fridge or freezer, microwave, saucepans or basic kitchen crockery: "Although a keen, competent cook, she was unable to prepare fresh, cooked meals for her young family; they had been surviving on predominantly cold packaged food until signposted to a local charity for further help."[211]

143. Some local authorities provide support in obtaining white goods or kitchen equipment through grants or loans. When available, these schemes can be limited: the woman in the above example from Exeter Foodbank was only eligible for assistance to obtain one white goods item.[212] Clearly, a lack of access to these items, or concern about using shared facilities in shared accommodation will significantly increase the appeal of pre-prepared food.

144. Fuel costs were repeatedly mentioned as a deterrent for cooking. Helen Barnard pointed to the 'poverty premium', telling us that energy can cost more if on a pre-payment meter.[213] Exeter Foodbank also told us that many of their clients have been cut off from their energy supply: "We frequently see people, particularly those on energy meters, whose gas/electricity supply has been cut off entirely."[214]

145. Evidence from Bags of Taste explained that space can be an issue; a lack of space to store bulk purchases which tend to be cheaper reduces the opportunity to use economies of scale with food shopping.[215] A lack of space means you have to buy smaller and usually more expensive quantities of food.

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209 Q 34 (Helen Barnard)
210 Written evidence from Bags of Taste (ZFP0029)
211 Written evidence from Exeter Foodbank (ZFP0059)
212 *Ibid.*
213 Q 34 (Helen Barnard)
214 Written evidence from Exeter Foodbank (ZFP0059)
215 Written evidence from Bags of Taste (ZFP0029)

146. Bags of Taste also pointed out that: "If you don't have a car, carrying shopping for a week or for a family is hard and even if public transport is available and affordable (which it often isn't) it requires you to shop little and often."[216] Travelling several times per week to shops therefore requires a higher time investment for those on a lower income, and, again, results in smaller quantities being purchased and therefore fewer savings. There is also, of course, the cost of the transport.

147. By themselves, none of these difficulties are necessarily insurmountable, but together they make the processes of purchasing and preparing food much more difficult and less rewarding. Arguably, very few of these barriers apply for those on higher incomes.

'Emotional bandwidth'

148. The impact of food insecurity on emotional wellbeing and mental health was emphasised by our evidence. Birmingham Food Council CIC told us that: "Some costs are intangible, including those related to pain and suffering, poor quality of life and emotional distress."[217] The emotional impact of food insecurity was echoed by other contributors and is also supported by academic research. A Cambridge University study found that there was a "persisting association between high self-reported stress … specific to [food insecurity], over and above socio-economic deprivation."[218]

149. We were told that poverty can reduce 'emotional bandwidth' rendering it incredibly difficult to focus past immediate needs. Helen Barnard explained further:

> "Living in constant anxiety about money affects the way that you think about everything else. There is a tunnel vision that people get: if you are really anxious and worried about things, you will psychologically focus in on a very small number of crucial things, such as keeping a roof over your head or wanting your kids to go to bed feeling full. There is some psychological research where they tested out inducing anxiety and seeing what it did to decision making—and what it does is narrow your focus because those things that you are focusing on cannot fail. It also reduces the bandwidth that you have to be able to look across lots of different options and start trading them off."[219]

Exeter Foodbank told us that:

> "[many people accessing foodbanks] are in crises (including relationship breakdown, redundancy, insecure accommodation, acute financial need or chronic ill health) which place their emotional and mental resources under strain. Under such stressful conditions, many lack sufficient capacity to acquire new skills or consider making long-term lifestyle changes; all available energies centre on addressing much more urgent, survival issues at hand. Eating can become low priority—a mere

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216   *Ibid.*
217   Written evidence from Birmingham Food Council CIC ([ZFP0057](#))
218   Amy Yau, Martin White, et al; 'Socio-demographic characteristics, diet and health among food insecure UK adults: Cross-sectional analysis of the International Food Policy Study',. *Public Health Nutrition, 1-13.* doi:10.1017/S1368980020000087 (27 April 2020): https://www.cambridge.org/core/journals/public-health-nutrition/article/sociodemographic-characteristics-diet-and-health-among-food-insecure-uk-adults-crosssectional-analysis-of-the-international-food-policy-study/B6B5A7E104B8565AFF6A3DB8C0FBEF60/core-reader
219   [Q 34](#) (Helen Barnard)

necessity for survival—to be completed with as minimal mental input as possible. Again, these factors increase the appeal of familiar, ready-prepared and nutritionally limited food items.[220]

150. **There are a series of hurdles to overcome to access a healthy diet. These hurdles are particular to lower income groups, and their combined effect means that it is significantly harder for people with a lower income to access a healthy diet. The current food system requires much more of people with fewer resources.**

151. We accept that it is possible to eat healthily on a tight budget. One can, for example, buy a variety of vegetables and prepare soup for very little. However, posing this as a solution misses the point: there are many difficulties involved in preparing healthy, nutritious meals, particularly for those on the lowest incomes. We have synthesised the evidence we received on these practical difficulties into an imagined scenario, to demonstrate why this is not as easy a solution as it may seem.

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220 Written evidence from Exeter Foodbank (ZFP0059)

Box 6: Why don't people just make soup?

The person following well-meant advice to prepare vegetable soup may, first, have to persuade the family that the dish will be enjoyable.

A person following this advice may look up a recipe. They may not have access to recipe books, so spend time looking at internet recipes, which can be fairly inaccessible.

There are new ingredients in the recipe, such as stock and possibly flavourings which the person would have to purchase. With a more complicated recipe, some ingredients may not be available in the local shop. Having spent time discovering this, the person may have to go to a different shop further away, taking longer, and possibly incurring transport costs.

If the ingredients are available in the local shop, these ingredients are likely only to be available in small quantities (thus decreasing the value for money). We were told that the cost of the ingredients of a new meal without a "middle class store cupboard" was estimated at £15.[221]

While looking for perhaps unfamiliar ingredients, the person shopping will have to ignore other temptingly displayed options, or price promotions. These are likely to be less healthy foods, but foods that the family may have tried before. If shopping with children, the person may have to ignore "pester power".

The kitchen equipment required for the recipe (weighing scales, knives, peelers, ovens, stoves) may be unavailable or inadequate, making the process more difficult or perhaps impossible.

Following a new recipe, particularly if not familiar with cooking generally, can be stressful and time-consuming.

If the soup goes wrong, is unpopular with the rest of the household, or simply doesn't taste good, the household may want to eat something else. Thus, two meals have been paid for and the time, money and energy spent on the original meal has been wasted. The remaining ingredients may also go to waste. Hungry children or growing teenagers may not feel full having eaten soup, so may want to eat something else.

Separately, these difficulties are not insurmountable. Combined, however, they represent a real barrier to accessing a healthy diet. When there are so many easy, cheap and reliable alternatives available, this process is a distinctly unappealing proposition.

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221 Written evidence from Bags of Taste (ZFP0029)

CHAPTER 4: THE FOOD ENVIRONMENT

152. The food environment encompasses every factor which could affect an individual's food choices. It includes, but is not limited to, the physical presence of different types of food outlets and the physical layout of outlets, the marketing and advertising of foods, and the information provided to consumers.

153. Witnesses emphasised the power of the food environment in influencing consumer choices. Alex Holt, Programme Lead at Food Active, described the need to ensure that: "We have healthier places to live".[222] Mark Laurie, Director of the Nationwide Caterers Association, summed up the power of the food environment on food choices and posed a challenge to change it:

> "People eat what is in front of them that day. You need to put an option in front of them. People do not choose unhealthy food out of spite; they choose it because that is what they know, that is what they can afford and that is what is in front of them."[223]

154. We heard repeatedly that the current food environment is set up in such a way as to encourage people to make less healthy choices, and that this is largely due to the fact that less healthy choices are simply more profitable for the food industry. We also heard that additional factors contribute to an unhealthy food environment, including that:

- The value and implementation of two Government food programmes designed to address food related inequalities—Healthy Start vouchers and the free school meals programme (FSM)—are inadequate;

- Aggressive and highly effective marketing techniques employed by the food industries including advertising, product placement and price promotions have a profound effect on consumer choice;

- There is a proliferation of fast food outlets, particularly around schools and in deprived areas; and

- Ineffective and confusing labelling means that consumers are not armed with the information they need to choose healthier options.

155. Our witnesses were very clear that changing the food environment would require concerted effort from Government, but that action had not yet materialised.

An in-built system failure

156. We were told that there is system failure at every level. At the level of the food environment, as at others, there is a systematic and commercial incentive for manufacturers and the retail and catering industries to produce and sell food which has a detrimental impact on public health.

157. Clearly, companies aim primarily to make profit. There is a competitive incentive to add value at every stage of the production and retail process. Processing food, attractive packaging, marketing and promotions are all part of the 'marketing mix' which is key to adding value to raw ingredients.

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222 Q 47 (Alex Holt)
223 Q 109 (Mark Laurie)

Tom Andrews from Sustainable Food Cities highlighted the increased profit margins that can be made on processed foods as compared to primary produce: "The whole basis of the food industry is predicated against low-processed food. There is no money in selling a head of broccoli. There is money only in high-level processing, which is about value added, and in very significant packaging, because it is about selling."[224]

158. That profit is the key driver of the food industry is economically obvious—but this is generally achieved through selling less healthy food. The Food Foundation has suggested that: "46% of food and drink advertising goes on confectionary, sweet and savoury snacks and soft drinks; while only 2.5% goes on fruit and vegetables."[225] Similarly, there is a highly uneven spread of product price promotions and prominent product placement on less healthy products.

159. **The food environment actively and effectively encourages unhealthier choices because there is a powerful commercial incentive for the food industry to ensure that people purchase highly processed products.**

160. There are some examples of excellent industry behaviours, but these are largely based on competitive advantage and appear to form the minority. Tom Andrews talked about the Food for Life catering mark which encourages caterers to provide better quality because: "it gives them a point of difference".[226] Clearly, this possible advantage is not currently working at scale, but it is encouraging.

161. Professor Jebb told us that there was a market failure: "a failure in food delivering for health, food delivering for social justice and food delivering for the environment. What that does is to make the case for some substantive intervention by government in the system."[227]

Experiences of the food environment

162. We were told, throughout our inquiry, that interactions with the food environment produce different effects for different groups, and that some groups are particularly adversely affected by factors within the food environment. That is to say, the negative effects of the food environment are socially distributed and can contribute to poorer health outcomes and health inequalities.

163. We received evidence, for example, that advertising, product promotions and food outlets selling fast food have a disproportionate effect on lower income groups. George Butterworth, Senior Policy Manager at Cancer Research UK, referenced research that found:

> "teams from the most deprived families were 40% more likely to remember junk food adverts every day, compared with teams from better-off families. Food advertising in the UK disproportionately featuring less healthy food items could, therefore, play a role in increasing health inequalities."[228]

224 Q 50 (Tom Andrews)
225 The Food Foundation, *The Broken Plate* (February 2019): https://foodfoundation.org.uk/wp-content/uploads/2019/02/The-Broken-Plate.pdf [accessed 30 June 2020]
226 Q 50 (Tom Andrews)
227 Q 63 (Professor Susan Jebb)
228 Q 12 (George Butterworth)

164. We were also told that outlets which largely sell less healthy food are likely to be concentrated in lower income areas. Dr Vogel told us that in one lower income area in Hampshire: "For more than 2,000 food outlets we mapped, we found that 43% were fast-food outlets and independent takeaways. Big and small supermarkets made up only 11.5% of the area, and healthy specialty stores such as greengrocers made up only 6.5%."[229] Tom Andrews linked this to the incidences of health inequalities and food insecurity: "health inequalities and the incidence of food poverty map perfectly on to income inequalities, if you look at a map of the UK. They also map on to the distribution of fast-food outlets and takeaways."[230] It is self-evident that if these outlets are more concentrated in more deprived areas, consumption of these foods will be higher in these places.

165. **The food environment has a substantially more negative impact on lower-income groups than their wealthier counterparts, and therefore directly contributes to rising health inequalities.**

Measures to address the food environment

166. The Government's policy on the food environment is largely contained in Chapters one, two and three of 'Childhood Obesity: a plan for action'. This plan sets out the different measures intended to halve childhood obesity and reduce the gap in obesity between children from the most and least deprived areas by 2030. The plans contained a number of measures aimed specifically at changing the food environment to support healthier choices. Chapter One was published in 2016,[231] Chapter Two in 2018,[232] and chapter three in 2019.[233]

167. Measures outlined in the Childhood Obesity Plans have included: out of home energy labelling, restrictions on location and price promotions, advertising restrictions on products high in fat, salt or sugar (HFSS) and an extension of the Healthy Start voucher scheme.

168. The final report of the former Chief Medical Officer, Professor Dame Sally Davies, 'Time to Solve Childhood Obesity', sets out a range of evidence-based interventions to address childhood obesity. She called on policy makers to take action to ensure that children:

"•   have access to healthy and affordable food,

   •   are protected from marketing of unhealthy foods, and

   •   have the opportunity to run, bike and play safely."[234]

229 Q 12 (Dr Christina Vogel)
230 Q 46 (Tom Andrews)
231 Department of Health and Social Care, *Childhood Obesity: A plan for Action* (August 2016): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/546588/Childhood_obesity_2016__2__acc.pdf [accessed 30 June 2020]
232 Department of Health and Social Care, *Childhood Obesity: A Plan for Action, Chapter 2* (June 2018): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718903/childhood-obesity-a-plan-for-action-chapter-2.pdf [accessed 30 June 2020]
233 Cabinet Office and Department of Health and Social Care, *Advancing our health: prevention in the 2020s—consultation document* (July 2019): https://www.gov.uk/government/consultations/advancing-our-health-prevention-in-the-2020s/advancing-our-health-prevention-in-the-2020s-consultation-document [accessed 30 June 2020]
234 Independent report by the Chief Medical Officer, *Time to Solve Childhood Obesity*, (October 2019): https://www.gov.uk/government/publications/time-to-solve-childhood-obesity-cmo-special-report [accessed 30 June 2020]

This report welcomed the Government's proposals for change, calling for full implementation, but argued that more action was required to meet the 2030 ambition to halve childhood obesity. Throughout our report, we have taken the same view.

A critical consensus

169. Our evidence was overwhelmingly of the view that while the steps proposed by the Government in their action plans could have value, they were, as proposed, insufficient. There was also scepticism of the Government's commitment to implementing them, with witnesses citing inaction and a plethora of long-closed consultations.

170. There was a clear consensus that Government action in this sphere had been limited. Kate Halliwell, Head of UK Diet and Health Policy at the Food and Drink Federation, said that: "there have been a lot of announcements and not necessarily the follow-through from those announcements"[235], and Dr Hilda Mulrooney, Associate Professor in Nutrition at Kingston University said on behalf of the Obesity Group of the British Dietetic Association that: "We are stuck in a limbo land".[236] We agree entirely.

171. Proposals in the obesity plan were generally welcomed, so far as they go. There was agreement across our evidence that the Government is working along the right lines, but that its proposals neither go far enough, nor are being progressed quickly enough. Professor Jebb reflected the position of the large majority of our evidence:

"the Government are talking really tough on obesity and there is lots of discussion, and that is good, but it is not enough. Action is still far too slow. Most of the childhood obesity plans have said, "We will consult on", "We will discuss", "We will consider", or, "We will think about". Many of those consultations have been out and closed months and months ago. There is simply no apparent sense of urgency… All the things they have done are good, but they are not nearly enough, and they are not being done at a pace and with a sense of urgency that is anywhere near the scale of the challenge."[237]

172. Several witnesses expressed frustration at the number of closed consultations where the Government had not yet published a summary of responses. Written evidence from the Ministers said that "we will be setting out our responses as soon as we can".[238] Jenny Oldroyd, Deputy Director of Obesity, Food and Nutrition at the Department of Health and Social Care, explained that some of the delay is due to processing times for consultation responses:

"We have had over 6,000 responses to the consultations on national policies. To be clear, that is not campaigns, so those are not responses where we can tick off a few hundred as one part of the campaign; they are responses that engage with the detail of the impact assessments that we have put out."[239]

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235 Q 72 (Kate Halliwell)
236 Q 72 (Dr Hilda Mulrooney)
237 Q 65 (Professor Susan Jebb)
238 Supplementary written evidence from HM Government (ZFP0098)
239 Q 28 (Jenny Oldroyd)

173. As illustrated by the table below, a number of proposals contained in Chapter 2 of Childhood Obesity Plan, announced in July 2018, have not (at the time of publication) progressed further than consultation stage.

Table 1: Progress of proposals in Chapter 2, Childhood Obesity: a plan for action (July 2018)

Policy measure	Progress (June 2020)
Calorie reduction programme	No further reports published since the programme's initial scoping document was published in March 2018.[240]
Ban of the sale of energy drinks high in caffeine to children	The consultation closed 21 November 2018.[241]
Out of home energy labelling	The consultation closed 7 December 2018.[242]
Location promotions and price promotions	The consultation closed 6 April 2019.[243]
Advertising (reducing children's exposure to advertising of HFSS products on TV and online, including 9pm watershed)	The consultation closed 10 June 2019.[244]
Updating the School Food Standards to reduce sugar consumption	The consultation closed 13 August 2019.[256]

174. We share our witness's scepticism of the Government's commitment to the measures that have already been published as proposals. Chapter three of the Childhood Obesity Plan, rather than being published as a separate document,

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240 Public Health England, *Calorie reduction: the scope and ambition for action* (March 2018): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800675/Calories_Evidence_Document.pdf [accessed 30 June 2020]

241 Department of Health and Social Care, *Consultations: Ending the sale of energy drinks to children*, (Updated November 2018): https://www.gov.uk/government/consultations/ending-the-sale-of-energy-drinks-to-children [accessed 30 June 2020]

242 Department of Health and& Social Care, *Consultations: Calorie labelling for food and drink served outside of the home*, (Updated October 2018): https://www.gov.uk/government/consultations/calorie-labelling-for-food-and-drink-served-outside-of-the-home [accessed 30 June 2020]

243 Department of Health and Social Care, *Consultations: Restricting promotions of food and drink that is high in fat, sugar and salt*, (Updated April 2019): https://www.gov.uk/government/consultations/restricting-promotions-of-food-and-drink-that-is-high-in-fat-sugar-and-salt [accessed 30 June 2020]

244 Department of Health and Social Care and Department for Digital, Culture Media & Sport, *Consultations: Further advertising restrictions for products high in fat, salt and sugar*, (updated 7 June 2019): https://www.gov.uk/government/consultations/further-advertising-restrictions-for-products-high-in-fat-salt-and-sugar [accessed 30 June 2020]

245 Department of Health and Social Care, *Consultations: Updating the government buying standards for food and catering services (GBSF)*: (updated August 2019): https://www.gov.uk/government/consultations/updating-the-government-buying-standards-for-food-and-catering-services-gbsf [accessed 30 June 2020]

was embedded within a separate consultation document: 'Advancing our health: prevention in the 2020s'.[246]

175. Jo Churchill MP, the DHSC Minister for Prevention, Public Health and Primary Care, provided further proof of the lack of commitment to advancing the measures outlined in chapters one, two and three of the Childhood Obesity Plans. She suggested that work on progressing consultations had been delayed by the impact of COVID-19. When asked, however, what she would have done in the absence of the outbreak, she pointed to yet another consultation (on the marketing and labelling of infant food), an evaluation (of the Trailblazers programme), and work on the out of home labelling consultation, which closed in December 2018. She said that: "there is so much to do in this space… much of it is just sitting there, ready for us to get going with it".[247] We recognise the substantial personnel redeployment that has been required as a result of COVID-19, but this work has been ready for some time: at the time of this report the scoping document for the calorie reduction programme was 27 months old.(See Table 1) Action, including on the recommendations outlined by the former Chief Medical Officer, Professor Dame Sally Davies,[248] should have already been taken.

176. **The failure to enact proposals to tackle childhood obesity has meant that levels of obesity and diet-related ill health have continued to rise. The glacial pace at which the Government has acted upon its own proposals to tackle childhood obesity is unacceptable.**

Suggested interventions to improve the food environment

177. A series of interventions were suggested throughout the inquiry that would address elements of the food environment. Some of these would extend proposals made by the Government, others are separate proposals. These included:

- Extension, increased funding and more effective implementation of the Healthy Start scheme, the free school meals (FSM) programme and the Holiday Activities and Food programme;

- Encouraging the uptake of healthy and sustainable food through public procurement;

- Restricting and reducing the advertisement of HFSS foods;

- Limiting the impact of product promotions and product placement of less healthy foods in supermarkets;

- Strengthening local authority powers to limit the proliferation of fast food outlets;

- Making changes to nutrition labelling; and

246 Cabinet Office and Department of Health and Social Care, *Advancing our health: prevention in the 2020s*, (Updated October 2019): www.gov.uk/government/consultations/advancing-our-health-prevention-in-the-2020s [accessed 30 June 2020]

247 Q 125 (Jo Churchill MP)

248 Professor Dame Sally Davies, *Time to Solve Childhood Obesity. An Independent Report by the Chief Medical Officer* (2019): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/837907/cmo-special-report-childhood-obesity-october-2019.pdf [accessed 30 June 2020]

- Increasing and improving the education and public health messaging on healthy diets.

Further detail on each of these proposals is set out below.

Government food programmes

178. It was apparent that three key national food programmes were not fulfilling their potential. Free school meals, the Healthy Start programme, and the holiday activities and food programme aim to increase access to food for people on lower incomes, the first by providing meals for pupils from lower-income families, the second by issuing vouchers to enable parents on lower incomes to purchase healthy food for young children, and the third by preventing holiday hunger.

179. Anna Taylor pointed to the "critical role" the Government have through its food programmes to tackle dietary inequalities. She argued that they are, on paper, good programmes but that: "there are huge areas of policy that are being implemented badly and where there are gaps".[249] On examination, we found several particular areas of concern which, if addressed, could go a long way to improving children's health. The need to ensure that Government food programmes enable families to access healthy food was reinforced by the evidence provided to us by the Minister for Public Health, Jo Churchill MP, who stated that "One in 10 children enters primary school obese, and that rises to one in five by the time they leave"[250] The adage that prevention is better than cure is emphasised in the report of the former Chief Medical Officer Professor Dame Sally Davies who wrote:

> "Today's children are tomorrow's workforce and the parents of future generations. Their health will be a deciding factor in whether the UK is healthy and prosperous in the future … If we act now to preserve their health, this 'country of children' could provide a future 'demographic dividend'. So, there is a strong economic case for more action to tackle childhood obesity."[251]

The Healthy Start Scheme

180. Healthy Start's website says that the scheme: "helps you give your family the very best start in life"[252]. The Healthy Start programme is a means-tested scheme which provides vitamins and vouchers to some parents of young children to help buy some basic healthy foods. The vouchers can be exchanged for milk, fruit or vegetables, and (depending on the age of the child) are worth either £6.20 or £3.10 per week. The principle of the scheme was widely welcomed in our evidence and there was mention of its potential to reduce health related inequalities. It was well described by one of our contributors as: "a basic, nutritional safety net for pregnant women, infants, and children in low-income families".[253] The model is sound, and forms the

249 Q 5 (Anna Taylor)
250 Q 119 (Jo Churchill MP)
251 Professor Dame Sally Davies, *Time to Solve Childhood Obesity. An Independent Report by the Chief Medical Officer* (2019): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/837907/cmo-special-report-childhood-obesity-october-2019.pdf [accessed 30 June 2020]
252 Healthy Start, 'What is Healthy Start?': https://www.healthystart.nhs.uk/ [accessed 30 June 2020]
253 Written evidence from Cllr Evelyn Akoto, Cabinet Member for Community Safety and Public Health, Southwark Council (ZFP0024)

basis of the charitable Alexandra Rose scheme, which distributes vouchers of similar value to be spent on fruit and vegetables at local markets to families eligible for Healthy Start.[254]

181. We were made aware of some significant failures undermining the scheme's potential. These factors were listed by one academic review of the scheme which identified: "erosion of voucher value relative to the rising cost of food, lack of access to registered retailers and barriers to registering for the programme".[255]

Value

182. The value of the vouchers is perhaps the scheme's most concerning deficiency. They are currently worth (depending on the age of the child) either £6.20 or £3.10 per week. We were told that the value of the vouchers, which are not linked to inflation and have not risen since 2009, is far too low. It was described by Shirley Cramer, Chief Executive of the Royal Society for Public Health as: "a tiny amount".[256] It was suggested that this does not even cover the basics: we were told that it does not cover the current costs of infant formula.[257]

183. The Government has told us that the value of the voucher is kept under continuous review.[258] While sensible additions have been made to the list of products one can buy, and to how the scheme works, the fact remains that the value of the voucher has not changed since 2009, and so its value in real terms has decreased. If linked to inflation, at an average of 3.1% per year between 2009 and 2019, the vouchers would now be worth either £8.37 or £4.18 per week; a sizeable difference from the current amount of £6.20 or £3.10.[259] Healthy Start's website says that the scheme: "helps you give your family the very best start in life". £3.10 per week does not seem sufficient to meet this objective.

184. ***The value of the Healthy Start vouchers is insufficient. The vouchers must immediately be uprated. This uprating should be substantial, but as an absolute minimum it should enable recipients to purchase the same amount of food that could be purchased in 2009, when the scheme began. The amount must be linked to the Consumer Price Index thereafter.***

Eligibility and take-up

185. Healthy Start vouchers are means tested and to qualify, families must be in receipt of social benefits and/or have a family income of £16,190 or less.(all pregnant women under the age of 18 qualify regardless of income or benefit

254 Alexandra Rose, 'How Rose Vouchers work': https://www.alexandrarose.org.uk/how-rose-vouchers-work [accessed 30 June 2020]
255 Alison McFadden, Josephine Green, et al, 'Can food vouchers improve nutrition and reduce health inequalities in low-income mothers and young children: a multi-method evaluation of the experiences of beneficiaries and practitioners of the Healthy Start programme in England', *BMC Public Health* (2014) (February 2014), https://bmcpublichealth.biomedcentral.com/articles/10.1186/1471–2458-14-148 [accessed 30 June 2020]
256 Q 62 (Shirley Cramer)
257 Written evidence from First Steps Nutrition Trust (ZFP0044)
258 Supplementary written evidence from HM Government (ZFP0098)
259 Calculated from Bank of England, 'Inflation Calculator': https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator [accessed 30 June 2020]

status).[260] We were told that eligibility has: "Declined by 30% since 2011 with less than half of children in poverty meeting the criteria".[261] This is extremely worrying and warrants a thorough review.

186. In January 2018, take-up was 66%, a decline of 14% since 2011.[262] In 2019, it was 64%, with at least 135,671 eligible families not applying for Healthy Start vouchers.[263] Reasons outlined by a series of reports for this low take up rate point to difficulty registering due to complicated application and acceptance processes, a lack of clarity about the scheme, and difficulty engaging with it.[264]

187. Nicky Dennison, Public Health Specialist at Blackpool City Council, explained that uptake is poor: "because of the bureaucracy that clients and our population have to go through. They have to complete forms and show proof, which they do not always have with them when they come."[265] Dr Katie Cuming, Public Health Consultant at Brighton and Hove City Council, said that: "It is nearly always the logistics of getting the health professional to sign the form and the fact that the vouchers arrive by post".[266]

188. Our witnesses echoed the reports of the First Steps Nutrition Trust[267] and Feeding Britain[268] on this subject; the best way to increase take-up of this scheme is to remove the levels of bureaucracy. Public health professionals working in local authorities expressed a strong desire for a system that was: "easier to administer… the need to get the health professional's signature and the fact that paper vouchers arrive, particularly in buildings or houses that are communal, is a very difficult way for families to do it… Any of those barriers being removed would be great."[269]

189. In addition to the sensible additions the Government has made to what one can buy, we welcome the Government's commitment to digitising the vouchers. We await reports on how effectively this will: "offer greater convenience and flexibility"[270] in using the vouchers, but caution that reform of the application process is equally essential.

190. There was a strong argument for raising awareness of the scheme at both local and national level as a lack of awareness was repeatedly cited as a

260 Healthy Start, 'Do I qualify for Healthy Start?': https://www.healthystart.nhs.uk/healthy-start-vouchers/do-i-qualify/ [accessed 30 June 2020]
261 Written evidence from Church Action on Poverty, Food Foundation, Nourish Scotland, Oxfam and Sustain: the alliance for food and farming (ZFP0031)
262 First Steps Nutrition Trust, The UK Healthy Start scheme, (2018): https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/5b8e2d0e575d1f6f1e5d2dcd/1536044307456/Healthy_Start_Report_for_web.pdf [accessed 30 June 2020]
263 Feeding Britain, Increasing Healthy Start Uptake, (February 2019) pp 1-2: https://feedingbritain.org/wp-content/uploads/2019/02/Healthy_Start_Uptake-_Feeding_Britain_Case_Study_2-1.pdf [accessed 30 June 2020]
264 Ibid and First Steps Nutrition Trust, The UK Healthy Start scheme, (2018): https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/5b8e2d0e575d1f6f1e5d2dcd/1536044307456/Healthy_Start_Report_for_web.pdf [accessed 30 June 2020]
265 Q 59 (Nicky Dennison)
266 Q 59 (Dr Katie Cuming)
267 First Steps Nutrition Trust, The UK Healthy Start Scheme, (2018): https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/5b8e2d0e575d1f6f1e5d2dcd/1536044307456/Healthy_Start_Report_for_web.pdf [accessed 30 June 2020]
268 Ibid. and Feeding Britain, Increasing Healthy Start Uptake: https://feedingbritain.org/wp-content/uploads/2019/02/Healthy_Start_Uptake-_Feeding_Britain_Case_Study_2-1.pdf [accessed 30 June 2020]
269 Q 59 (Dr Katie Cuming)
270 Supplementary written evidence from HM Government (ZFP0098)

key challenge in implementing it effectively.[271] The University of York IKnowFood Programme called for increased promotion of the scheme for recipients,[272] and the Association of Convenience Stores also raised the issue of awareness among independent retailers, only a third of which engage with it.[273]

Reform

191. It appeared to us that everyone well acquainted with the scheme recognised its limitations. A joint submission from Church Action on Poverty, the Food Foundation, Nourish Scotland, Oxfam and Sustain said that: "Improving the scheme requires expanding eligibility criteria, starting with those on Universal Credit, increasing the voucher value, and introducing a programme to ensure all those who are eligible benefit."[274] This is a long list of changes and we are inclined to agree with evidence from First Steps Nutrition Trust which argued that: "numerous difficulties with the scheme mean it needs root and branch reform".[275]

192. It appears that the Government has recognised these concerns. In Chapter 2 of the Government's Childhood Obesity Plan, the Government committed to consult on plans to use Healthy Start vouchers to provide additional support to children from families on lower incomes.[276] This consultation has, as of June 2020, yet to appear. In response to a parliamentary question, Jo Churchill MP, Parliamentary Under-Secretary at the Department of Health and Social Care, stated that the Government has postponed the consultation until after the UK's exit from the European Union, but is "considering a range of options" for consultation.[277] We have been told that work is underway to: "make it easier to apply for the vouchers and easier to spend the vouchers in store".[278] This work includes digitising the vouchers and extending the range of products which can be purchased with them: it has preceded the delayed consultation, and will not address the value of the vouchers.

193. As it stands, the Government is two years behind on its commitment: it seems that it is consulting on how to consult on its plans to reform the scheme.

194. ***Comprehensive reform of the Healthy Start Scheme is long overdue. The Government must release a wide-ranging consultation addressing "root and branch" reform before the end of 2020 and appoint a Healthy Start champion to raise awareness of the scheme among individuals and retailers.***

Free school meals

195. In England, the Government provides free school meals (FSM) to primary and secondary school pupils who qualify through receipt of some benefits.[279]

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271 Written evidence from Cllr Evelyn Akoto, Cabinet Member for Community Safety and Public Health, Southwark Council (ZFP0024)

272 Written evidence from the University of York IKnowFood programme (ZFP0040)

273 Written evidence from the Association of Convenience Stores (ZFP0050)

274 Written evidence from Church Action on Poverty, Food Foundation, Nourish Scotland, Oxfam and Sustain: the alliance for food and farming (ZFP0031)

275 Written evidence from First Steps Nutrition Trust (ZFP0044)

276 HM Government, *Childhood obesity: a plan for action, Chapter 2* (2016): p 11: https://assets.publishing. service.gov.uk/government/uploads/system/uploads/attachment_data/file/718903/childhood-obesity-a-plan-for-action-chapter-2.pdf [accessed 30 June 2020]

277 HC written question, 29 January 2020, 9618

278 Q17 (Jenny Oldroyd)

279 Eligibility is determined by receipt of some qualifying benefits.

All infant students (from reception to year two) are entitled to free school means under Universal Infant Free School Meals (UIFSM). Serious concerns were raised with us about these schemes and their implementation, including concerns about eligibility criteria, adherence to standards, and the low value of the meals grant to schools. Two witnesses also raised serious concerns about unclaimed money "going missing".[280] Anna Taylor described the operation of FSM as: "bad implementation of what on paper is a good programme".[281]

Box 7: Experiences of food insecurity

In a series of phone calls, facilitated by Sustain and Church Action on Poverty, the secretariat spoke with individuals who have experienced food insecurity. Penny from Newcastle said:

> "They roll out the free school meals for the kids but then I've had families come to me and ask me if I can print those vouchers out because that's the only way that they will get their vouchers to go to the shop to actually access the free school meals. If you don't have a printer at home, that's another barrier."

Source: See Appendix 5.

196. Following the COVID-19 outbreak, the Government issued guidance which states that schools are expected to continue to provide support. It outlines different approaches that could be taken through food parcels from existing providers. Where current provision cannot be extended in this way, the Department for Education has developed a centrally funded voucher scheme to be used at supermarkets.[282] At the time of writing, the Department was unable to confirm how many vouchers had been delivered in a useable form, or how many eligible children had been registered.[283]

Funding

197. Since 2011, school meals (except UIFSM) have been funded through central funding for schools (the Dedicated Schools Grant).[284] It is for the schools to make their own decisions about the use of this funding. UIFSM, which encompasses 1.5 million infants in England[285] is funded by a separate grant under the Education Act 2002.[286]

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280 Q 47 (Professor Greta Defeyter). See also Q 5 (Anna Taylor)..
281 Q 5 (Anna Taylor)
282 Department for Education, *Coronavirus (COVID-19): free school meals guidance for schools*, (30 April 2020): https://www.gov.uk/government/publications/covid-19-free-school-meals-guidance/covid-19-free-school-meals-guidance-for-schools [accessed 30 June 2020]. In June 2020 this scheme was extended to cover the 2020 summer holiday.
283 BBC, *Coronavirus: Families still waiting for free school meal vouchers*, (30 April 2020): https://www.bbc.co.uk/news/education-52488208 [accessed 30 June 2020]
284 House of Commons Library, School meals and nutritional standards (England), Briefing Paper 04195, January 2020
285 HC Deb, 4 February 2019, col 10
286 Education and Skills Funding Agency, *Universal infant free school meals (UIFSM): conditions of grant 2019 to 2020* (June 2019): https://www.gov.uk/government/publications/universal-infant-free-school-meals-uifsm-2019-to-2020/universal-infant-free-school-meals-uifsm-conditions-of-grant-2019-to-2020 [accessed 30 June 2020]

198. To cover an anticipated increase in the number of pupils eligible for FSM "before the lagged funding system catches up"[287] the Government issued a school-level meal cost grant for the 2018–19 and 2019–20 academic years. This is, annually, £440 per additional pupil, or £2.30 per day.[288] It was made extremely clear to us that this amount of money is insufficient, both for the schools, and for the children.

199. Schools often allocate this money to pupils themselves via a card payment system, allowing students to choose what they spend the money on. Research by the Child Poverty Action Group has found that, often, the value does not cover the cost of a full meal:

> "When you talk to children in schools, they tell you that it is not enough to buy a full meal with: it will buy you a main course and a drink or a pudding and a drink, but you cannot get all three. So, while other children around you are having the lot, children on free school meals are not; they are having a very reduced calorie intake by comparison"[289]

The Government's written evidence stated that it was supportive of schools which made the same meal offer available to all students. It agreed that this was important, both for reasons of nutrition and social wellbeing.[290] Our evidence suggests that schools are not always achieving this: it is important that the Government remain committed to ensuring that all pupils, regardless of household income, can access nutritious food at school.

200. The National Voucher Scheme was set up to provide money for food during school closures to parents whose children would ordinarily receive free school meals. The value is £15 per child per week, as opposed to the £11.50 which would ordinarily be paid to the school. This appears to be the Government's assessment of the cost of providing five lunches. Funding must remain at this rate. In anticipation of the response that schools can benefit from economies of scale where parents cannot, it is likely that this is more than outweighed by the costs to the school (and not to the parent) of staffing, equipment, facilities and transport. The funding provided by the Government to cover free school meals does not appear to fulfil the costs to the school of providing them. This is supported both by a report from the IFS and a leaked 2016 report commissioned by the Government, both of which found that there is pressure on school's budgets.[291]

201. ***The decision to increase the funding for lunches during school closures is welcome. The value cannot be allowed to regress once children return to school. The allowance allocated to schools for free school meals must be uprated to at least the level provided during the school closures and linked to inflation thereafter.***

287 Department for Education, *Free school meals supplementary grant* (July 2018): https://assets. publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/731589/FSM_ Supplementary_Grant_Guidance.pdf [accessed 30 June 2020]
288 Q 40 (Professor Greta Defeyter)
289 Q 34 (Alison Garnham)
290 Supplementary written evidence from HM Government (ZFP0098)
291 Institute for Fiscal Studies, *Universal free school meals are back on the table*, (5December 2019): https:// www.ifs.org.uk/election/2019/article/universal-free-school-meals-are-back-on-the-table [accessed 30 June 2020] and The Guardian, *Free school meals 'putting pressure on small schools' budgets*, (31 August 2016): https://www.theguardian.com/education/2016/aug/31/free-school-meals-putting-pressure-small-schools-budgets-uk [accessed 30 June 2020]

Eligibility

202. In primary schools, 15.8% of pupils are known to be eligible for, and claiming, free school meals. In secondary schools, it is 14.1%.[292]

203. Prior to April 2018, all claimants for Universal Credit were eligible for FSM. This was changed in 2018 to target those households with a net annual income of below £7,400 or who are on some of the legacy benefits. It has been found that under these proposals, slightly more children from low-income households will be eligible under the UC system—an increase of 50,000 children.[293]

204. There will be, however, a significant number of children excluded who would previously have been eligible. Though there are protections in place for existing claimants until Universal Credit is fully rolled out, the IFS study found that "About 160,000 (13%, or 1 in 8) of the 1.3 million children who would have qualified under the legacy system will find themselves ineligible under UC."[294]

205. There was some concern that the eligibility criteria for FSM are too tight, excluding many who need this support. Alysa Remtulla, Head of Policy and Campaigns at Magic Breakfast, stated that: "the current eligibility criteria are becoming an increasingly unreliable determinant of need".[295] This is supported by a review by the Institute for Fiscal Studies (IFS) which found that under the Government's plans: "only about half of children in the poorest fifth will be entitled to FSMs."[296]

206. ***We recommend that the Government outlines how it intends to mitigate the impact that their eligibility proposals will have on those families who will lose eligibility for free school meals.***

207. There have been some calls for free school lunches to be extended to every child.[297] Dr Mary Bousted, Joint General-Secretary of the National Education Union, stated that a policy of universal free school meals would "end what our members report as the stigma for children who get free school meals."[298]

292 Department for Education, *Schools, pupils and their characteristics*, (27 June 2019): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812539/Schools_Pupils_and_their_Characteristics_2019_Main_Text.pdf [accessed 30 June 2020] 1

293 Institute for Fiscal Studies, *Free school meals under universal credit* (April 2018): https://www.ifs.org.uk/uploads/publications/bns/BN232.pdf [accessed 30 June 2020]

294 *Ibid.*

295 Q 39 (Alysa Remtulla)

296 Institute for Fiscal Studies, *Free school meals under universal credit* (April 2018): https://www.ifs.org.uk/uploads/publications/bns/BN232.pdf [accessed 30 June 2020]

297 Sustain, *Free School Meals for All*: https://www.sustainweb.org/childrensfoodcampaign/free_school_meals/ [accessed 30 June 2020]

298 Q 39 (Dr Mary Bousted)

Box 8: Experiences of food insecurity

In a series of phone calls, facilitated by Sustain and Church Action on Poverty, the secretariat spoke with individuals who have experienced food insecurity. Tia from Blackburn with Darwen said:

> "Because it was such a small school, everyone was friends with each other but I never wanted to use my free school meals because sometimes you had to go in with a massive pink slip to get them and I just felt too embarrassed so I sometimes got my mum to put money on my card so I could use that instead."

Source: See Appendix 5.

208. Witnesses cited evidence on the impact of UIFSM, which has generally been positive, to argue for extending school meal eligibility criteria. Professor Defeyter stated that: "The take-up in that scheme has been phenomenal, and all the research reports suggest that it has reduced the stigma. More importantly, it is teaching our children good skills around what they consume".[299] An evaluation of UIFSM published in January 2020 also pointed to positive health outcomes. The study found that: "those exposed to UIFSM have significantly better bodyweight outcomes then they otherwise would, in terms of being more likely to be [a] healthy weight (1.2 percentage point by the end of the school year), less likely to be obese (0.7 percentage points) and have a lower BMI".[300]

209. The use of evidence currently available as a basis for extending FSM is problematic. The witnesses advocating for extended entitlement of FSM acknowledged that the research on the impact of UIFSM had been somewhat limited. Professor Defeyter acknowledged that the research around UIFSM is "patchy" and that there had not been "proper modelling".[301] This was reinforced by an IFS report costing Labour and Liberal Democrat election pledges to extend school meal entitlement. It outlined some weaknesses in the evidence base, concluding that while there had been some research to indicate a link to attainment: "It's not yet clear whether these policies would have big further benefits for children's attainment or health."[302]

210. There has been some study on the cost implications of different proposals to extend eligibility for FSM. In the 2019 general election, the Labour party initially proposed extending free school meals to all primary school children. The IFS estimated that, in 2024, this proposal would cost £850 million in today's prices.[303] A proposal by the Liberal Democrats (and later the Labour party) to extend FSM to all secondary school pupils whose family receive universal credit was estimated at costing between £280 million and £310 million. Coupled with the cost of universal primary free school meals also

299 Q 39 (Professor Greta Defeyter)
300 Angus Holford and Birgitta Rabe, *Going universal—The impact of free school lunches on child body weight outcomes* (6 March 2020): https://www.iser.essex.ac.uk/files/projects/FSM/UIFSM_Bodyweight_Outcomes_20200306.pdf [accessed 30 June 2020]
301 Q 39 (Professor Greta Defeyter)
302 Institute for Fiscal Studies, *Universal free school meals are back on the table*, (5 December 2019): https://www.ifs.org.uk/election/2019/article/universal-free-school-meals-are-back-on-the-table [accessed 30 June 2020]
303 *Ibid*. This estimate assumes that spending per meal is protected in real terms. The Labour party subsequently announced plans to extend free school meals to all secondary school pupils whose families receive universal credit, the same offer as proposed by the Liberal Democrats.

proposed by the Liberal Democrats, this could cost between £1.1 and £1.2 billion.[304]

211. We fully agree with Professor Defeyter's view that the high costs of extending FSM have to be offset with the longer term gain[305] but there has not been sufficient modelling of the impacts of FSM to establish what the longer term gain would be.[306] We cannot yet recommend it on the basis of long term health benefits.

212. ***We recommend that the Government must undertake rigorous research on the impact of Universal Infant Free School Meals on health and attainment outcomes and use the results of this evidence base to inform future policy on school meals, including breakfasts.***

Missing money

213. One financial concern was raised by Anna Taylor and Professor Defeyter, who drew our attention to money for FSM that was: "going missing".[307] When pupils miss a day of school, or for some other reason do not use the money on their cashless lunch card, this money is not returned to the child.

214. Anna Taylor referred to this money being taken from the child and: "absorbed into the coffers."[308] Referring to a study she had conducted with Feeding Britain, Professor Defeyter told us that: "there is approximately £88.3 million per annum in the system going missing. Nobody, including the DfE, seems to quite know where that money is."[309] No information is collected by Government on this matter.[310]

215. Sarah Lewis, Director, System Leadership and Strategy (Early years and schools) at the Department for Education, said that recuperating and redistributing this money was a decision for school administrations:

> "Schools have the ability to give that money back to the children if they wish. We do not say they have to because free school meals are not a cash benefit for that individual child. It is money overall that is given to schools so they can ensure that children can access free school meals while they are in school. It is just set up in a different way."[311]

216. It is not possible to exclude the possibility that some of the funding may therefore be lost to schools. Many schools have financial arrangements with the local authority, or with private caterers to provide school meals. The estimates we heard vary from £70 million[312] to £88 million,[313] but whatever the true figure, it is something which the Government should investigate further.

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304 *Ibid.*
305 Q 39 (Professor Greta Defeyter)
306 Institute for Fiscal Studies, *Universal free school meals are back on the table* (5 December 2019): https://www.ifs.org.uk/election/2019/article/universal-free-school-meals-are-back-on-the-table [accessed 30 June 2020]
307 Q 40 (Professor Greta Defeyter). See also Q 5 (Anna Taylor).
308 Q 5 (Anna Taylor)
309 Q 40 (Professor Greta Defeyter)
310 Supplementary written evidence from HM Government (ZFP0098)
311 Q 24 (Sarah Lewis)
312 Q 5 (Anna Taylor)
313 Q 40 (Professor Greta Defeyter)

Adherence to food standards

217. Following an independent review of school food, revised school food standards came into force in January 2015. These standards apply to all food served in maintained schools,[314] including food made in and out-of-house.[315] We have been told that, without enforcement, the school food standards are in practice, voluntary, and that this undermines the intentions of the regulations.

218. The school food standards and accompanying guidance documents are intended to help children develop healthy eating habits and ensure that they get the energy and nutrition they need for the school day.[316] The food-based standards specify "which types of food should be served at school, and how often."[317]

219. The standards mandate provision of some healthy foods and stipulate a list of less healthy foods to avoid.[318] There is no mention of the Government's Eatwell Guide, but the standards recommend that schools purchase food according to the Government Buying Standards for Food and Catering Services (GBSF).[319]

220. Ms Lewis from the DfE told us that the Department was revising and updating the school food standards.[320] It is unclear on what basis the Department is doing so; a consultation that had been announced in 2016, in Chapter 1 of the Childhood Obesity Plan[321], and subsequently re-announced in Chapter 2[322] (2018), has not yet been published.

221. The responsibility to ensure these standards are being met falls to school governing bodies for whom the Department for Education (DfE) has published guidance. These standards are mandatory for all maintained schools, pupil referral units and non-maintained special schools in England. Adherence is an explicit requirement in funding agreements for academies and free schools founded before 2010 and after June 2014.[323]

222. A critical weakness identified by several of our witnesses is that there is no mechanism or enforcement body to ensure that school food meets the required standards. Sarah Lewis confirmed that the Department does not monitor or enforce the standards: "No, we do not proactively go round and check whether schools meet the school food standards."[324]

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314 The standards do not apply to academies which opened from 2020 and agreed funding prior to June 2014.

315 Department for Education, *School food in England: Advice for governing boards* (March 2019): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/788884/School-food-in-England-April2019-FINAL.pdf [accessed 30 June 2020]

316 School Food Standards, *A practical guide for schools their cooks and caterers* (2014), p 2: http://www.schoolfoodplan.com/wp-content/uploads/2014/06/School-Food-Standards-Guidance-FINAL-V1a-140616.pdf [accessed 30 June 2020]

317 *Ibid.*

318 The Requirements for School Food Regulations 2014, Schedule 2 (SI 2014/1603)

319 HM Government Written evidence (ZFP0079)

320 Q 17 (Sarah Lewis)

321 HM Government, *Childhood Obesity: A Plan for Action*, (August 2016) p 9: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/546588/Childhood_obesity_2016__2__acc.pdf [accessed 30 June 2020]

322 HM Government, *Childhood Obesity: A Plan for Action Chapter 2*, (2018): p 10: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718903/childhood-obesity-a-plan-for-action-chapter-2.pdf [accessed 30 June 2020]

323 The Requirements for School Food Regulations 2014 (SI 2014/1603)

324 Q 24 (Sarah Lewis)

223. The Department appears to rely on parents to complain if they feel their child's school is not meeting the requirements. Ms Lewis explained that they: "Rely on our regulatory system and we want parents to complain to us if they feel that schools are not meeting their statutory responsibilities."[325] The Government says that the standards were designed to be easily understood and that complaints should come through the school in the first instance.[326] We feel this lacks an understanding of the real world practical scenario where parents may not feel able to challenge the school, nor have the available time and 'emotional bandwidth' to embark on a complaints process.

224. As a means of enforcing standards, reliance on parents is highly problematic for several reasons. Firstly: there are instances of what Anna Taylor termed: "information asymmetries".[327] Parents are not in a position to address nutritional standards which they may or may not be aware of, or be able to access information about–and this is a highly specialised task. Secondly, and more importantly, this places an inappropriate burden on parents to seek information from the school and report to the Department as to whether the Government's own standards are being followed. As a means of enforcement, this is patently unfit for purpose, further evidenced by the Government's admission that, to date, no action has been taken following a complaint made in this way.[328]

225. The guidance for governing bodies has no statutory footing and is thus inappropriate as a means of enforcement. Without a mechanism to monitor food provided in schools, there is no way to ensure schools are meeting the required standards. Alysa Remtulla, Head of Policy and Campaigns at Magic Breakfast explained: "The biggest challenge that we see is the lack of monitoring of the standards. Because of that, they are not necessarily enforceable. There is no watchdog or body that monitors how the standards are implemented."[329]

226. It is a demonstrably ineffective approach. Witnesses highlighted a wide variation in school food standards across schools, which effectively amounts to a postcode lottery for nutritional standards. Nicky Dennison, Public Health Specialist for Blackpool City Council, expressed frustration with a lack of enforcement and provided figures for Blackpool: " … across our 33 primaries; 11 schools meet the school food standard and the others do not."[330] Such a stark fluctuation of standards across England leads to children receiving widely variable standards of nutrition. Worryingly, since there is no enforcement mechanism or reviewer: we cannot estimate the scale of the problem.

227. We were made aware of some potential mechanisms to monitor food standards. The Local Authority Caterers Association (LACA) suggested that Ofsted, the education standards body, could play a role. They advocated for the inclusion of: "Enforcement and monitoring of the School Food Standards across all schools including academies and free schools, inclusion of the school food offer and food education programmes into Ofsted inspections'[331]Dr

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325 *Ibid.*
326 Supplementary written evidence from HM Government (ZFP0098)
327 Q 3 (Anna Taylor)
328 Supplementary written evidence from HM Government (ZFP0098)
329 Q 43 (Alysa Remtulla)
330 Q 59 (Nicky Dennison)
331 Written evidence from LACA (ZFP0048)

Mary Bousted, Joint General-Secretary of the National Education Union, however, felt strongly that monitoring should be specialised. In support of the need for an inspection process she stated: "If we look at food standards in schools, this should be done by people who know something about food standards. We cannot require Ofsted inspectors to be nutritionists and food standards experts as well."[332]

228. **The absence of any effective enforcement mechanism for school food standards means that the nutritional value of the food a child receives at school is one of chance rather than policy. It is difficult to understand what, in truth, the school food standards achieve.**

229. *Monitoring and evaluation of the school food standards must be centrally coordinated to ensure consistent compliance. The Departments for Education and Health and Social Care should establish a joint task force responsible for monitoring and enforcing adherence to the school food standards. The taskforce should have the power to publish the names of non-adhering schools and where necessary require the development of an agreed action plan to meet standards.*

School breakfasts

230. Some evidence advocated for increased support for breakfast clubs in deprived areas. Breakfast clubs, which are run in schools and sometimes with private sector involvement, can provide a nutritious breakfast for children who may not otherwise eat breakfast. There is some research to demonstrate that an extension of the Government's National School Breakfast Programme (NSBP) could provide health and attainment benefits to children from lower-income households.

231. In November 2018, the Government announced a new aim to "improve breakfast for pupils in more than 1,700 schools by 2020."[333] The National Schools Breakfast programme (NSBP), which is implementing this pledge, is a Government-third sector partnership to provide free breakfast clubs for children in the most disadvantaged areas and is funded by up to £26 million. As of January 2020, 1800 schools were participating in the scheme.[334] In that month, the funding was extended to last until March 2021, and there was additional funding announced to recruit up to 650 new schools.[335]

232. Magic Breakfast, one of the third sector delivery groups for the programme, explained that the purpose of the scheme was to ensure that no child is too hungry to learn:

"A hungry child cannot concentrate on their lessons and misses out on hours of valuable learning. That means they fall behind their wealthier peers and that contributes to the educational attainment gap … Very

332 Q 43 (Dr Mary Bousted)
333 Department for Education, *Thousands more school children receiving a nutritious breakfast*, (2 November 2018): https://www.gov.uk/government/news/thousands-more-school-children-receiving-a-nutritious -breakfast [accessed 30 June 2020]
334 Q 41 (Alysa Remtulla)
335 Q 41 (Alysa Remtulla) & Department for Education, *Free meals and summer holiday activities for children*, (4 January 2020): https://www.gov.uk/government/news/free-meals-and-summer-holiday-activities- for-children [accessed 30 June 2020]

strong evidence demonstrates that school breakfasts can play an important role in addressing this."[336]

233. There is some evidence to suggest an attainment gain in schools which provide universal free school breakfast clubs. A study conducted by the IFS has indicated that pupil absences fell, and that some children made the equivalent of two months' additional progress in reading and writing over the course of a year.[337] Alysa Remtulla from Magic Breakfast referred to research which showed a link between breakfast consumption and achievement in GCSEs of two grades higher attainment,[338] and a Department for Education assessment on the impact of attaining GCSEs, which indicated a lifetime productivity increase of between £55,000 and £283,000.[339]

234. Evidence from Professor Louise Dye outlined studies conducted by a University of Leeds research group on the effect of breakfast consumption. Their research had found that:

- Breakfast consumption had a positive effect on cognitive function and that: "Tasks requiring attention, executive function, and memory were facilitated more reliably by breakfast consumption relative to fasting";

- There was a positive effect of breakfast on some classroom behaviours;

- "Increased frequency of habitual breakfast was consistently positively associated with academic performance."[340]

235. There are some limitations in the academic evidence on impact; the IFS study included a caveat that most of the gains are likely to be from the content or context of the clubs: eating healthier food or building stronger relationships with other pupils and staff while eating at school; rather than an overall increase in the numbers of children consuming breakfast at all. Furthermore, while relatively disadvantaged students were more likely to attend the clubs, the intervention was less effective at raising attainment of pupils from these backgrounds; there was limited impact on reducing socio-economic gaps in attainment.[341]

236. We received evidence of local councils establishing their own schemes to provide breakfasts for children at school.[342] This evidence was extremely positive. One evaluation of a scheme in Blackpool found that:

"Children eating free breakfasts consume significantly more healthy items for breakfast than non-attendees; that the scheme contributes to

336 Q 41 (Alysa Remtulla)
337 Institute for Fiscal Studies, *Breakfast clubs work their magic in disadvantaged English schools*, (4 November 2016): https://www.ifs.org.uk/publications/8714 [accessed 30 June 2020]
338 Katie Adolphus, Clare Lawton, and Louise Dye, 'Associations Between Habitual School-Day Breakfast Consumption Frequency and Academic Performance in British Adolescents', *Frontiers in Public Health*, vol 7, (November 2019) p 283: https://www.frontiersin.org/articles/10.3389/fpubh.2019.00283/full [accessed 30 June 2020]
339 Q 46 (Alysa Remtulla) and Department for Education, *The economic value of key intermediate qualifications: estimating the returns and lifetime productivity gains to GCSEs, A levels and apprenticeships* (December 2014) pp 8–9: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/387160/RR398A_-_Economic_Value_of_Key_Qualifications.pdf [accessed 30 June 2020]
340 Written evidence from Professor Louise Dye, University of Leeds (ZFP0058)
341 Institute for Fiscal Studies, *Breakfast clubs work their magic in disadvantaged English schools* (4 November 2016): https://www.ifs.org.uk/publications/8714 [accessed 30 June 2020]
342 Written evidence from the Labour Hunger Campaign (ZFP0052) and Blackpool Council (ZFP0036)

reducing nutritional inequalities; the universality of the scheme reduced stigma by ensuring no child is singled out for a free breakfast and children are happier [sic.] more alert after attending the free school breakfast."[343]

237. Aside from the evidence on attainment, there is compelling evidence of need. One of the most shocking conclusions we reached in Chapter 3 was that there are many children in this country living with constant or intermittent hunger. We heard of several cases where parents cannot afford to feed children breakfast.[344] Magic Breakfast also referred us to a survey of Head Teachers of whom 81% had seen a rise in the number of pupils arriving at school hungry in the last five years.[345] Regardless of the impact of breakfasts upon attainment, it seems to us that where there are instances of deprivation so acute that children cannot otherwise eat breakfasts, they must be provided. School breakfast clubs provide a sensible and effective way for this to happen.

238. The Government has already extended the funding for the NSBP, and we note that the 2017 Conservative manifesto originally included a pledge to provide free breakfasts for all primary school children in England[346]: evidence that there is, somewhere, a political will for this programme. More, however, needs to be done. First, the programme is not reaching enough of those who need it. Second, the funding is time limited.

239. The programme does not currently reach all or even most of those who need it. Professor Defetyer referred to the Households Below Average Income statistics, estimating that by 2022: "Almost 30% of all children— or nine children in every classroom of 30—will live in poverty."[347] The National Schools Breakfast Programme was specifically targeted at the most disadvantaged areas. The measurement the Government uses to assess eligibility, the Income Deprivation Affecting Children Index (IDACI) has been found to be: "quite an accurate measure of need."[348] The eligibility criteria that the Government has created based on this measurement is, perhaps, restrictive.[349] The IDACI uses the postcodes of registered addresses to determine the likelihood that a pupil lives in an out-of-work or low-income family. A school will only become eligible for the NSBP if 50% of pupils fall into categories A-F, the highest levels of deprivation. Given that the programme is: "reaching about 20% of the children who we think are at risk of hunger",[350] it is clear to us that this threshold should be lowered.

240. Another key issue is that the funding is time limited. Although the Government has already announced a one-year funding extension to run the programme until March 2021. The idea is that this funding will "kick-start

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343 Written evidence from Blackpool Council (ZFP0036)

344 Written evidence from Exeter Foodbank (ZFP0059)

345 Written evidence from Magic Breakfast (ZFP0076) and NAHT, '#*NAHTconf: "Embarrassed and ashamed" the impact of austerity on England's schoolchildren',*: https://www.naht.org.uk/news-and-opinion/press-room/nahtconf-embarrassed-and-ashamed-the-impact-of-austerity-on-englands-schoolchildren/ [accessed 30 June 2020]

346 Following the 2017 election, this pledge was dropped. 'Conservatives abandon manifesto plan for free school breakfasts', *The Independent* (26 July 2017): https://www.independent.co.uk/news/uk/politics/conservatives-manifesto-general-election-2017-free-school-breakfasts-lunch-a7861836.html [accessed 30 June 2020]

347 Q 38 (Professor Greta Defeyter). See paragraph 59 for related statistics.

348 Q 39 (Alysa Remtulla)

349 *Ibid.*

350 Q 41 (Alysa Remtulla)

self-sustaining clubs"[351] which will continue independently of Government funding. While warmly welcoming the programme, Ms Remtulla cautioned that it was not: "'job done, problem solved'… The funding is only short term. After the year or two of support, schools are left to find their own financial support for their breakfast club."[352] Schools and groups of parents in the most deprived areas are beset with competing demands on their time, emotional bandwidth and money. While seed-funding is all very well, there is a very real risk that, when the money runs out, making further progress will be unsustainable.

241. *We recommend that the eligibility threshold for the National Schools Breakfast Programme is lowered and funding increased to ensure that the programme reaches all of those who need it.*

242. *The National Schools Breakfast Programme must support and train facilitators to enable schools to access future external funding.*

243. *Notwithstanding Government support to access funds, central funding for the National School Breakfast Programme must not be withdrawn all at once, producing a 'cliff edge' effect. The funding must be removed gradually and only when schools are able to access reliable sources of funding to sustain the clubs.*

Holiday Hunger

244. As outlined in Chapter 3, it is believed that around 3 million children in the UK are affected by holiday hunger.[353] We welcome the Government's decision, following a campaign by the footballer Marcus Rashford, to extend the National Voucher Scheme for the 2020 summer holiday: it will ensure that the most vulnerable children are supported.

245. Holiday clubs provide a buffer against hunger, but the work they do to educate and provide stimulating experiences for children is extremely valuable. These opportunities should be available for every child who needs them. We were told by Blackpool Council that:

> "the summer holidays present an additional challenge by causing 'learning loss' for children, disproportionately affecting those children from more deprived backgrounds–thought to be caused by social isolation and boredom as well as inequity in opportunities and experiences to enhance learning, compared to their more affluent peers."[354]

246. Concern has been expressed that the closure of schools during the COVID-19 outbreak could increase educational inequalities between the richest and poorest groups.[355] This evidence of a "learning gap" indicates that extra-curricular activities offered by holiday groups (which in one area included "sport sessions, family craft, cook and eat sessions, team around the school, trips to the beach and a high ropes experience"[356]) remain of paramount

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351 Department for Education, *Free meals and summer holiday activities for children*, (4 January 2020): https://www.gov.uk/government/news/free-meals-and-summer-holiday-activities-for-children [accessed 30 June 2020]

352 Q 41 (Alysa Remtulla)

353 See paragraph 93.

354 Written evidence from Blackpool Council (ZFP0036)

355 Institute for Fiscal Studies, *Educational gaps are growing during lockdown* (18 May 2020): https://www.ifs.org.uk/publications/14849 [accessed 30 June 2020]

356 Written evidence from Blackpool Council (ZFP0036)

importance in reducing educational inequalities that could otherwise be perpetuated over school holidays.

247. In 2019, the Department for Education awarded £9 million through its Holiday Activities and Food programme to local organisations to establish local coordinators of free holiday clubs. The funding reached around 50,000 children in 11 local authority areas. Co-ordinators were based in local organisations to: "work with providers and services in their local area … they were responsible for funding provision in their local area"[357].

248. The funding for local coordinators is welcome, but we heard that it is insufficient. Clubs are run largely by the charitable sector, and issuing funding through a bidding process does not allow for long term planning. Nicky Dennison of Blackpool Council told us that: "It is quite challenging for the third sector when funding suddenly becomes available; everybody wants a piece of the pie or feel that they want to deliver everything."[358]

249. The Government's programme aims to reach 50,000 children, but this will fall short of supporting the 3 million children who are affected by holiday hunger. Alysa Remtulla told us:

> "The response to holiday hunger is largely driven by the third sector and is piecemeal. It is like a postcode lottery which depends on where in the country you live and whether you have access to the work that the charity is doing … We would like to see a co-ordinated national response from the Government. At the moment, the Government's funding for holiday hunger is around £9 million, which reaches 50,000 children—a small fraction of the children that we think might need those services."[359]

250. We agree that provision of funding should be co-ordinated more effectively, and targeted to ensure it reaches the children that need that support. One proposal that was suggested to us was to make local authorities responsible for wrap-around holiday provision, and be provided ring-fenced funding to enable this.[360] Local authorities are better placed than central Government to determine the needs of their populations during school holidays, but they cannot rectify the problem without sufficient resource.

251. Providing resources for local coordinators means that need can be effectively met in conjunction with local partner organisations, but for the purposes of accountability and consistency, this funding should be directed to the local authority. Holiday club coordinators should sit within the local authority, with ring-fenced finding from central Government.

252. Funding should be extended, without the need for bidding. Given the demand on Government funding following the COVID-19 outbreak, a targeted approach should be taken to fund coordinators in those areas which need provision. Area selection should be on the basis of eligibility criteria designed to capture as many areas in need as possible.

253. ***We recommend that the Government should significantly extend the funding provided through the Holiday Activities and Food programme to ensure that more children can access holiday clubs.***

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357 Supplementary written evidence from HM Government (ZFP0098)
358 Q 55 (Nicky Dennison)
359 Q 42 (Alysa Remtulla)
360 Written evidence from the Labour Hunger Campaign (ZFP0052)

It should use generous thresholds based on the Income Deprivation Affecting Children Index to determine which areas should receive this funding.

Public procurement

254. A number of respondents and witnesses suggested that harnessing the power of public procurement would be an effective way to create a healthier and more sustainable food environment. Witnesses mentioned the potential of public sector provision to shift demand by setting good examples and shifting the norm, as well as reducing the amount of less healthy or unsustainable food consumed from public sector providers. There were some differences in what our witnesses advocated for public procurement to achieve—from organic food, to British food, to food that supported better public health— which served to emphasise the great potential that, all agreed, procurement offers.

255. We were told that one benefit of providing healthier meals as the Government's own offering would do a great deal to normalising healthy and sustainable diets. It is clear that the necessary, sizeable shift in consumption will require people to become accustomed to eating healthy food. Rob Percival, Head of Policy (food and health) at the Soil Association, argued that procurement was a way of creating a larger market[361] and Dr Adrian Morley, Research Fellow at Manchester Metropolitan University, argued that the Government should reform its own provision—catering services in schools and hospitals— to expose the general public to healthy and sustainable diets.[362]

256. Perhaps the simplest advantage of changing procurement standards is that doing so would mean that people who consume publicly produced food could be eating healthier and more sustainable products, with all the associated benefits.

257. It was also suggested that public procurement could support horticulturist producers at the same time as increasing the nutritional value of food ingested. Kath Dalmeny, Chief Executive of Sustain, said: "There are smart and dynamic procurement systems that enable horticultural producers in particular to go into public sector procurement… Using clever technical systems, the mechanics of making the system sympathetic to the supply of fruit and veg means it then gets incorporated into dishes and people's diets."[363]

258. One of the key benefits of public procurement is that it is powerful. It forms a key component of the criteria for the Sustainable Food Cities awards because "it is such a key driver."[364] Ms Dalmeny from Sustain explained that the systematic nature of procurement made it a powerful lever to support sustainable production: it can be done at scale. Sustain had some success with a procurement project to work with catering bodies on serving sustainable fish. We were told that working with the methods of production and working to transition fishing fields sustainably: "Can be done in a principled, systematic way … it can happen at scale".[365] The power of this tool was recognised by two local authorities who were working to reform

361 Q 90 (Rob Percival)
362 Q 76 (Dr Adrian Morley)
363 Q 86 (Kath Dalmeny)
364 Q 51 (Tom Andrews)
365 Q 83 (Kath Dalmeny)

procurement standards as part of their food strategies and whole systems approaches.[366]

Government policy on public procurement of food

259. The Government's public procurement policy is contained within the School Food Standards and the Government Buying Standards for Food and Catering Services. As we have already examined the School Food Standards, we focus here on the Buying Standards.

260. Government Buying Standards for Food and Catering Services (GBSF) apply to Government departments and agencies as well as prisons, the armed forces and the NHS. The guidance states that it provides a tool for: "setting technical specifications and evaluating bids".[367] It is not, to say the very least, forceful. While central government procurers are required to follow the standards, others are only encouraged to follow it. The guidance outlines a set of minimum standards to be applied in specification for tenders and contract performance conditions, rather than in daily delivery.

261. These standards were introduced as: "a means of meeting the Greening Government Commitments when buying and providing food and catering service".[368] It contains some guidance on environmental standards: namely that at least 10% of the total monetary value of raw ingredients must be certified to Publicly Available Integrated Production or Integrated Farm Management Standards of natural habitats, pollution control and prevention, energy, water and waste, and management of soils, landscape and watercourses. There are also some sustainability requirements for fish and palm oil.[369]

262. Nutrition standards are included; there are mandatory aims to reduce salt, increase fruit and vegetable consumption, reduce saturated fat, and ensure healthy fat, fibre and fish levels.

263. These standards are set low; those on production standards and animal welfare require only that UK legislative standards are met. It is accompanied by a scorecard which was, we were told: "not used very well or very often".[370] Even more concerningly, some of the basic minimum conditions can be departed from if there is a significant increase in cost which cannot be recuperated elsewhere.[371]

264. We also feel that the evidence from the Government indicated a reluctance to expand the use of public procurement to encourage people to eat in a certain way. The landscape was described as complex and allowing "varying levels of direct influence".[372] The Government pointed to different nutritional requirements for different groups such as hospital patients, army personnel and primary school children. They also made the point that if menus do not

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366 Q 56
367 Department for Environment, Food and Rural Affairs, *The Government Buying Standard for Food and Catering Services*: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418072/gbs-food-catering-march2015.pdf [accessed 30 June 2020]
368 Written evidence from HM Government (ZFP0079)
369 *Ibid.*
370 Q 93 (Rob Percival)
371 Department for Environment, Food and Rural Affairs, *The Government Buying Standard for Food and Catering Services*, (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418072/gbs-food-catering-march2015.pdf [accessed 30 June 2020]
372 Written evidence from HM Government (ZFP0079)

match customer demand consumers will take custom elsewhere, affecting the commercial viability of catering operations. We were unconvinced by these arguments:

- As to the levels of influence, the Government has the ability to assert more control over these public procurers through legislation. This is demonstrated by the actions of the Scottish Government, which has set standards for all NHS food outlets.[373] One witness even stated that public procurement was a lever which was "potentially within the readiest control".[374]

- Regarding the argument presented about nutritional requirements for different groups, a neat solution is presented by the inclusion of the Eatwell Guide in the nutritional standards. The Guide is designed to be used by anybody and sets out: "How much of what we eat overall should come from each food group to achieve a healthy, balanced diet." It states that it applies to most people and directs anyone with special dietary requirements to: "Adapt the Eatwell Guide to meet their individual needs".[375] Requiring procurers or public bodies to consider the Government's Eatwell guidance is therefore in no way inconsistent with meeting the nutritional needs of different groups.

- We were not convinced by the argument on commercial viability. While the Government has correctly identified a risk that consumers will move from public offerings, this is not applicable in many cases, such as in hospitals or prisons. Moreover, we feel that the norm-shifting power of public procurement in tackling healthy diets overshadows the possible commercial drawbacks. If the Government cannot ensure its own food offering encourages adherence to the Eatwell Guide, how seriously can the public be expected to take it?

265. ***The benefits of high and robust standards for public procurement and public food offerings are clear. The Government must strengthen and develop the Buying Standards for Food and Catering Services to ensure that they fulfil their potential to create a healthier and more sustainable food environment. In particular, the revised standards should:***

- ***Apply equally and consistently to all Government procurement, including the NHS, prisons and the armed forces;***

- ***Apply to all private suppliers contracted to provide food for the above;***

- ***Require a significantly higher proportion of food to be produced in line with the Publicly Available Integrated Production or Integrated Farm Management Standard than is currently required;***

- ***Embed nutritional standards based on the Eatwell Guide;***

373 NHS Health Scotland, *Evaluation of the implementation and impact of the Healthcare Retail Standard in Scottish hospitals and other NHS facilities in 2017* (January 2019) http://www.healthscotland.scot/media/2326/evaluation-of-the-healthcare-retail-standard.pdf [accessed 30 June 2020]
374 Q 63 (Dr Louise Marshall)
375 NHS, *The Eatwell Guide*: https://www.nhs.uk/live-well/eat-well/the-eatwell-guide/ [accessed 30 June 2020]

- ***Disallow any escape clause, as currently exists, for measures on the basis of cost; and***

- ***Provide for an enforcement mechanism.***

The marketing and promotion of food

266. Marketing is an incredibly powerful tool. It shapes the environments within which consumers make their food choices. There are extensive freedoms for the food industry to market products more or less as they wish.

267. Marketing of less healthy products encourages consumers to buy less healthy products, and disproportionately affects lower-income people. Regulation is necessary to control it, and the Government's action so far appears to have been limited to publication of consultations.

268. Perhaps the most obvious element of the food environment is the retail environment. Elements such as advertising, store layout and price and placement promotions play a key part in influencing consumer choices. To be blunt, if these techniques were not effective, the industry would not use them. Dr Clare Pettinger emphasised this point:

    "There is no doubt that the food environment, (which includes marketing, advertising and promotions), influences us in our food choice behaviours (Butland et al, 2007), and this influence can potentially be modified by stronger and more radical political leadership in the form of legislation around marketing and advertising."[376]

269. The Government has committed to a number of proposals aimed at reshaping the food environment, including ending the sale of energy drinks to children, calorie labelling in the out-of-home sector, restricting promotions of fatty and sugary foods by location and price, and further advertising restrictions. The Government confirmed in its written evidence that it has held consultations on all of these proposals but that its responses to these consultations are still in progress. [377]

    Advertising

270. Our evidence told us that advertising works largely in favour of highly processed food which tend to be less healthy products. The Government has been criticised for failing to implement proposals which would restrict the times at which some less healthy foods are advertised on television. The Government's evidence summarised the problem:

    "children remain exposed to significant levels of high fat, salt and sugar (HFSS) advertising across the media they enjoy the most. This is a concern as evidence suggests that exposure to HFSS advertising can affect what and when children eat, both in the short term and in the longer term by shaping children's food preferences from a young age".[378]

271. Anna Taylor emphasised that advertising not only encouraged food choices, but also created new demand in the market, She stated that advertisers:

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376 Written evidence from Dr Clare Pettinger assisted by members of the Food Plymouth partnership (ZFP0033)
377 Supplementary written evidence from HM Government (ZFP0098)
378 Written evidence from HM Government (ZFP0079)

"Create a market, and then habits and norms are formed around them."[379] Kate Halliwell of the Food and Drink Federation described the different ways in which marketing (which includes advertising) works: "Of course, marketing makes a difference. Companies use marketing predominantly to be competitive and take an advantage over their competitors, to raise their own profile or to look at new products coming on to the shelf."[380]

272. There is evidence to suggest that less healthy foods are marketed significantly more often and with more financial muscle than healthy foods. The Food Foundation told us that: "The advertising industry is oriented towards selling us fast-food brands combined with manufactured confectionery and things that tend to be less good for us."[381] A Food Foundation report, 'The Broken Plate', found that in 2017 over £300 million worth of advertising was spent on less healthy food products.[382] They suggested that this might be due to small margins for producers leaving little room for promotion spend and that the small variety of fruit and vegetables means the advertisers would benefit the whole market rather than their own share. Professor Lang put the discrepancy into perspective:

> "About two-thirds of £1 billion is spent on food advertising in Britain, and about £5 million goes on something one can call health promotion. David and Goliath are not even in it… The problem with advertising is that its job is to keep the machine churning ever-cheaper food through the system, and do it by scale. That is why Unilever spends that money. That is why Coca-Cola spends $4 billion a year on marketing, which dwarfs the entire World Health Organization's budget by a factor of two, every year."[383]

Government policy

273. Chapter 2 of the Childhood Obesity Plan committed to a consultation on introducing further advertising restrictions on TV and online for products high in fat, sugar and salt (HFSS). This consultation closed in June 2019 and included proposals to ban advertising of some products before 9pm.[384] Restrictions on advertising were widely welcomed by witnesses and within the written evidence.[385] George Butterworth stated that, if the proposal were implemented, it "would have a big impact on reducing exposure to young people."[386]

274. We were referred to research by the Obesity Health Alliance which had found that there was broad public support for this move: "72% of people support the introduction of a 9pm watershed on junk food adverts during popular

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379 Q 4 (Anna Taylor)
380 Q 69 (Kate Halliwell)
381 Q 4 (Anna Taylor)
382 The Food Foundation, *The Broken Plate* (February 2019) p 14: https://foodfoundation.org.uk/wp-content/uploads/2019/02/The-Broken-Plate.pdf [accessed 30 June 2020]
383 Q 4 (Professor Tim Lang)
384 Department of Health and Social Care, *Restricting promotions of food and drink that is high in fat, sugar and salt* (updated April 2019): https://www.gov.uk/government/consultations/restricting-promotions-of-food-and-drink-that-is-high-in-fat-sugar-and-salt [accessed 30 June 2020]
385 See, for example, written evidence from the Nuffield Council on Bioethics (ZFP0045), Cllr Evelyn Akoto, Southwark Council (ZFP0024), Sustain (ZFP0071), the Faculty of Dental Surgery at the Royal College of Surgeons (ZFP0010), and the Food Ethics Council (ZFP0054)
386 Q 16 (George Butterworth)

family TV shows."[387] Our witnesses emphasised that while restrictions were necessary, they were not a: "magic bullet"[388]. Professor Susan Jebb stated that:

> "On the nine o'clock watershed, yes, fine; that is clearly one of the things, but we absolutely must not get so obsessed with that that we think we have done it. Of course, we have not. It has to be much broader. It has to include social media, billboards and all those other things… I support the nine o'clock watershed but it is not nearly enough. It has to go much further than that. What I do not want is for the nine o'clock watershed to become a huge fig leaf that stops anything else."[389]

275. Another proposal consulted upon was the suggestion that advertising restrictions should apply online. Jenny Oldroyd from the DHSC, stated that: "We have asked in our consultation on advertising on television and online whether there are other media that we need to consider and do more on in this space."[390] The answer to that query is, as far as our evidence goes, is yes—other media must be included. Written evidence from the Faculty of Dental Surgery indicated that 70% of people support a watershed on online advertisements.[391]

276. Physical environments such as bus stops and billboards that hold advertisements for less healthy foods also have an impact on consumer choices and health. Some of our witnesses advocated for providing increased powers to local authorities to tackle the influence of food advertising in the physical environment. We acknowledge the concern from retailers, manufacturers and broadcasters about restrictions to advertising.[392] Mhairi Brown, Policy and Public Affairs Coordinator at Consensus Action on Salt, Sugar and Health, however, raised the success of the ban on HFSS food spending on Transport for London to argue that bans of this nature can be commercially viable: "I refer to the example of Transport for London's restrictions on advertising high fat, salt and sugar products. That ban has not led to a loss in advertising revenue. In fact, revenue has gone up by £1 million since it was introduced."[393]

277. It is important once again to state that, notwithstanding the commercial concerns inherent in the proposals to restrict advertising, diet related ill health is costing the NHS over £6.1 billion per year and £27 billion to wider society.[394] The decision to impose restrictions has already been made by the Government: action must follow.

278. ***The proposals in Chapter 2 of the Childhood Obesity Plan to impose restrictions on the advertising of HFSS foods were welcomed by a***

387 Written evidence from the Faculty of Dental Surgery at the Royal College of Surgeons (ZFP0010). See also Obesity Health Alliance, *Protect children from all junk food advertising, say health experts - and parents agree* (28 February 2019): http://obesityhealthalliance.org.uk/2019/02/28/protect-children-junk-food-advertising-say-health-experts-parents-agree/ [accessed 30 June 2020]
388 Q 69 (Dr Hilda Mulrooney)
389 Q 63 (Professor Susan Jebb)
390 Q 24 (Jenny Oldroyd)
391 Written evidence from the Faculty of Dental Surgery at the Royal College of Surgeons (ZFP0010)
392 Q 103 (Henry Dimbleby) and written evidence from the Food and Drink Federation (ZFP0009)
393 Q 69 (Mhairi Brown)
394 Public Health England, *Health Matters: obesity and the food environment* (31 March 2017): https://www.gov.uk/government/publications/health-matters-obesity-and-the-food-environment/health-matters-obesity-and-the-food-environment--2 [accessed 30 June 2020]

large majority of our evidence. The Government must, by the end of 2020, roll out these proposals both for television and online.

Product placement

279. Several witnesses referred to the placement within supermarkets of less healthy foods in locations which are designed to promote impulse buying. The effect of this tactic may not be consciously noticed, but we were told that it is an important influence on food choices.

280. It was suggested to us that product placement disproportionately markets unhealthier foods. We were told that in a study in Sheffield: "on average 89.5% of food products on display to children in convenience supermarkets were less healthy, and that in most cases foodstuffs on display were at the upper end of the spectrum of less healthy foodstuffs".[395]

281. Dr Vogel referred to research which suggested that this problem was worse in food outlets which offer cheaper food, and are thus more likely to be used by lower income groups: "Discount supermarkets and small supermarkets had poorer environments, with fewer choices of healthy foods, cheaper pricing of unhealthy foods and more prominent product placement of unhealthy foods."[396]

282. Consultations under the Childhood Obesity Plan included a proposal to ban by regulation the placement of some products in popular locations in supermarkets such as the end of aisles, store entrances and checkouts. The options consulted upon were: retaining the *status quo*; banning placement of all HFSS foods in these locations; and banning placement of HFSS foods (as defined under the sugar and calorie reduction programmes and the Soft Drinks Industry Levy). The Government indicated a preference for the latter which would represent a smaller group of products than if they had opted for all HFSS foods.

283. Interestingly, it appears that, as in the work in advertising healthy food, the power of product placement can be harnessed to encourage healthier choices. Dr Vogel's pilot study on the food environments indicated that there were also opportunities in providing healthier foods, when fruit and vegetables were placed in these prominent places, "the results were very promising".[397]

284. A report of the Regulatory Policy Committee summarised the financial benefits of the Government's proposed regulation:

> "The expected benefits of the regulations include the health benefits that would accrue because of lower calorie consumption amongst overweight and obese people. This would be equivalent to £2.5 billion over the assessment period of 25 years. Social care savings would amount to

395 Written evidence from the Faculty of Dental Surgery at the Royal College of Surgeons (ZFP0010)
396 Q 12 (Dr Christina Vogel) and Christina Vogel, *et al.*, *Education and the Relationship Between Supermarket Environment and Diet* (August 2016): https://pubmed.ncbi.nlm.nih.gov/27067035/ [accessed 30 June 2020]
397 Q 15 (Dr Christina Vogel)

£0.3 billion and a reduction in premature mortality would deliver an expected additional £0.1 billion of economic output."[398]

285. The proposal would exclude small and micro businesses. We find this hard to justify. A report from the Regulatory Policy Committee on the Government's impact assessment also found that the Department had not fully explained the decision to exclude small businesses.[399]

286. As with so much of the Childhood Obesity Plan, no summary of responses has been published to the consultation which closed in April 2019.[400]

287. ***Proposals to end the product placement of HFSS foods in popular supermarket locations were welcomed. The Government must, by the end of 2020, enact them, ensuring that the ban covers the widest range of less healthy foods possible and includes small businesses.***

Price promotion

288. Price promotion is similar to other aspects of marketing of less healthy products; it encourages consumers to buy more products that are less healthy and disproportionately affects lower-income groups. Regulation is necessary to control it. As seen in other areas, the Government's action so far has been to produce a consultation.

289. As with many of the marketing techniques employed by food manufacturers and retailers, price promotions disproportionately focus largely on less healthy foods. The Government's evidence acknowledged this and outlined some of the key issues:

> "Promotions on food and drink in the UK reached record levels in 2015 and were the highest in Europe, with 40% of the food and drink people purchased being on promotion Data shows that in store promotions tend to be skewed towards HFSS products as these are more likely to be promoted. Evidence also shows that volume promotions (such as multibuy offers i.e. buy one get one free) cause a greater sales uplift compared to other types of price promotions such as simple price reductions. Volume promotions increase the amount of food and drink people buy by around 20%. Consumers typically do not stockpile these extra purchases to take advantage of the lower price; instead they increase their consumption."[401]

290. The Government's consultation on this measure outlined proposals that restricted the following HFSS promotions:

- multibuy promotions of pre-packaged HFSS food and drink

- extra free promotions of pre-packaged HFSS food and drink

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398 Regulatory Policy Committee, *Restricting checkout, end-of-aisle, and store entrance sales of food and drinks high in fat, salt, and sugar (HFSS)* (22 February 2019): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/781451/RPC-DHSC-4333_1__-_Restreicting_checkout__end-of-aisle__and_store_entrance_sales_of_food_and_drinks_HFSS__1_.pdf [accessed 30 June 2020]

399 *Ibid.*

400 Department of Health and Social Care, 'Restricting promotions of food and drink that is high in fat, sugar and salt', (updated April 2019): https://www.gov.uk/government/consultations/restricting-promotions-of-food-and-drink-that-is-high-in-fat-sugar-and-salt [accessed 30 June 2020]

401 Written evidence from HM Government (ZFP0079)

- free drink refills with the purchase of a meal in out of home settings[402]

291. Our witnesses were welcoming of these proposals. The Royal Faculty of Dental Surgery referred to Public Health England research which showed that: "Eliminating price promotions on high sugar products altogether would lead to a 6.1% reduction in sugar volumes purchased by consumers, equating to around 7.4 grams of sugar per individual per day."[403]

292. The Government's consultation on this closed in April 2019, and a summary of responses has not yet been published.[404]

293. ***The Government must, by the end of 2020, act on their proposals to restrict price promotions on HFSS products.***

Fast food outlets

294. Our evidence was more than clear about the problem of fast food takeaway outlets. Our witnesses all acknowledged that fast food outlets contribute a great deal to less healthy diets, and an unhealthy food environment. It was also argued that these outlets are largely concentrated in deprived areas and thus contribute to inequality. Local authorities can use planning permission powers and licensing regulations to restrict the opening of new fast food restaurants on the grounds that they pose a hazard to public health but it was explained to us that this is not always easily done.

295. Fast food outlets offer a cheap way of providing less healthy food. We were told that prices were low and that a standard meal with a fizzy drink would normally cost around £2.99.[405] Dr Vogel pointed to the commercial driver to offer low prices and large portion sizes:

> "Often in areas where there is high competition between fast-food outlets, they are highly competitive with each other. You might get free portions of chips. They do a lot of tactical pricing to make sure that they are bringing in the business. In areas of the high street where there are tens of fast-food outlets and takeaway shops, there is lots of competition".[406]

296. There are clear indications that these fast food restaurants are concentrated in lower income areas. Data from Public Health England indicates that there is a: "Strong association between deprivation and the density of fast food outlets, with more deprived areas having a higher proportion of fast food

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402 Department of Health and Social Care, *Consultation on restricting promotions of products high in fat, sugar and salt by location and by price* (January 2019) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770704/consultation-on-restricting-price-promotions-of-HFSS-products.pdf [accessed 30 June 2020]

403 Written evidence from Faculty of Dental Surgery (ZFP0010). See also Public Health England, *Sugar Reduction: The evidence for action – Annex 4: An analysis of the role of price promotions on the household purchases of food and drinks high in sugar*, (2015) pp 5–6: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/470175/Annexe_4._Analysis_of_price_promotions.pdf [accessed 30 June 2020].

404 Department of Health and Social Care, *Restricting promotions of food and drink that is high in fat, sugar and salt*, (Updated April 2019): https://www.gov.uk/government/consultations/restricting-promotions-of-food-and-drink-that-is-high-in-fat-sugar-and-salt [accessed 30 June 2020]

405 Q 89 (Mark Laurie)

406 Q 13 (Dr Christina Vogel)

outlets per head of population than others."[407] Self-evidently, this means that lower-income people are much more likely to consume this type of food. The concentration of this type of food in poorer areas is therefore contributing to the increased levels of obesity and diet related ill health in lower income groups and plays a key role in exacerbating health inequalities.

297. Some of our evidence called for the use of planning restrictions to reduce the number of fast food outlets, particularly when concentrated near schools. Guidance for local planning authorities states that plans should: "take account of and support local strategies to improve health, social and cultural wellbeing for all".[408] It appears, however, that this is more difficult than it should be.

298. Premises are defined on a 'Use Classes' system. A3 permission is historically required for in-house consumption of hot food, and A5 permission applies where the business primarily provides take-away food. Nicky Dennison from Blackpool Council pointed out that the permission is allocated to the premises rather than an individual and that this means the local Council does not have the ability to prohibit a new take-away outlet opening:

> "I would love A5 planning to be looked at, because once a property has A5 planning it stays with the property and does not go. If one fast-food outlet goes away, the next landlord or owner can come in and open as a fast-food takeaway. I would love us to look at how we can make changes to that. It should probably be a bit like alcohol licensing, in that it goes with the name of the person who owns the business rather than the property itself."[409]

299. The allocation of Use Classes to premises rather than to individuals using these premises is a missed opportunity for a potentially powerful tool for local authorities. If new proprietors were required to reapply for the appropriate Use Class, this would enable local authorities to adapt to changing circumstances and more effectively fulfil their statutory duty to improve the health of their local population.[410]

300. The problem is not restricted to take-away outlets. There was some discussion of exclusion zones around schools, which some local authorities do attempt to enforce. Dr Cuming from Brighton and Hove Council argued that this problem is more complex than simply restricting only fast food outlets:

> "We found that secondary school-aged kids with a small amount of money to pay for their lunch ended up going to two or three different food businesses… They might be garage shops, newsagents, a café or a hot-food takeaway, which certainly would not come under the A5 restriction… We also realised that it is not just about lunchtimes; it is

407 Public Health England, *Healthy people, healthy places briefing, Obesity and the environment: regulating the growth of fast food outlets* (March 2014) p 4: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/296248/Obesity_and_environment_March2014.pdf [accessed 30 June 2020]
408 Ministry of Housing, Communities & Local Government, *The National Planning Policy Framework*, CP 48 (February 2019): https://www.gov.uk/government/publications/national-planning-policy-framework--2 [accessed 30 June 2020]
409 Q 58 (Nicky Dennison)
410 House of Commons Library, Local authorities' public health responsibilities (England), Standard Note, SN06844, March 2014

the route to and from school. Restrictions probably need to be a bit more comprehensive than just talking about A5 outlets at lunchtime."[411]

301. Brighton and Hove also found that as the traditional exclusion zone of 400 metres around schools did not cover the distance secondary school pupils would walk, a distance of around 800 metres was more realistic.[412] The complexity of the issue seems to have led Brighton and Hove to allocate their resources towards other methods of promoting a healthy food environment. While this might be a sensible approach for a local authority to make in the context of a national framework "that is not particularly supportive",[413] there is no justification for central Government to avoid tackling the issue of fast food outlets. We are fully cognisant that fast food outlets are not the only problem, but they are undoubtedly contributing to an unhealthy food environment.

302. The Government's written evidence outlined some actions it was taking to clarify planning regulations, but Jenny Oldroyd from the DHSC acknowledged that while local authorities do have some powers to enforce exclusion zones around schools, there are serious difficulties in the ability to apply them in practice:

> "Those powers are there, but I do not pretend at all that they are always easy and straightforward to use. They face a potential legal challenge, particularly on using planning powers to restrict the opening of fast food restaurants."[414]

303. We recognise that the unprecedented circumstances presented by the outbreak of COVID-19 have limited the ability for restaurants, pubs and cafes to provide food on the premises. The Government has made it easier to change the use of premises for this reason—allowing, for instance, restaurants to become takeaways.[415] We recognise that, during a time of crisis, this flexibility is necessary. It must not become a precursor to a highly permissive licensing environment which enables less healthy food outlets to proliferate unchecked. It remains of vital importance that local authorities can protect the health of their residents.

304. **The planning environment must support the efforts of local authorities to limit the proliferation of fast food outlets around schools.**

305. *The Government must conduct a review on the use of licensing and planning to ensure that:*

    (1) *local authorities are able to enforce exclusion zones of at least 800m around schools; and*

    (2) *when use of a building subject to use class A3 or A5 is transferred, new planning consent must be obtained.*

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411 Q 58 (Dr Katie Cuming)
412 Q 58 (Dr Katie Cuming)
413 Q 2 (Anna Taylor)
414 Q 24 (Jenny Oldroyd)
415 Ministry of Housing, Communities & Local Government, *Government to grant permission for pubs and restaurants to operate as takeaways as part of coronavirus response*, (17 March 2020): https://www.gov.uk/government/news/government-to-grant-permission-for-pubs-and-restaurants-to-operate-as-takeaways-as-part-of-coronavirus-response [accessed 30 June 2020]. This time limited permitted development right was introduced in March 2020 through a negative Statutory Instrument.

306. ***Immediately following the withdrawal of the permitted development rights introduced in March 2020, the Government should consult upon and enact a scheme to enable local authorities to charge out of home food outlets an amount of council tax which is in proportion to the healthiness of their food offering.***

307. Mark Laurie, Director of the Nationwide Caterers Association, reminded us that the absence of a fast food shop does not necessarily imply the presence of healthy food instead: "If you ban food businesses from opening, you are not replacing them. It is not that Leon is going in because Greggs came out; there is just an empty shop. You have to provide affordable alternatives for people, and they have to be appealing."[416]

308. Any reduction in access to fast food outlets should consider enabling or providing alternatives. Mr Laurie suggested working with existing outlets to provide appealing and cheap, but healthier food. This is an option which does not seem to have been suggested by the Government at any stage. The idea of working with and supporting retailers to change their offerings to make them healthier or more sustainable was, however, raised by Food Active,[417] Sustainable Food Cities,[418] and some local authorities. Mr Andrews, Programme Manager of Sustainable Food Cities, indicated that to achieve healthier and sustainable diets: "We have to find ways that enable food organisations to make a profit, one of which is through competitive difference. It is possible… You need national policy to guide that process, but you also need schemes."[419] Blackpool Council's Healthier Choices Award works to support local businesses to "make small changes to their menu offer to improve the healthier options on offer" has had some success, with 142 local businesses signed up to the scheme.[420] The Centre for Diet and Activity Research provided a further example, Takeaway Masterclass, a course to encourage healthier cooking practices and menu options, was found to be both feasible and acceptable in a small group of takeaways, although the Centre stated that further research was required on maintaining participation and retention.[421]

309. A national scheme to encourage healthier choices in take-away outlets, coupled with a toolkit for local authorities to assist, would be a significant first step in changing people's intake. If there were a scheme and support which would enable fast food outlets to provide appealing and healthy food to their consumers, we believe that many outlets would do so.

310. Another way to ensure increased access to healthier, more sustainable food is to empower different food providers to sell to the public. Mr Laurie argued that Government should:

> "… let us have the opportunity to sell it to them. We cannot take on the shops, but we could go out and sell healthy food in communities, or we could get people from these communities to sell, essentially, home-cooked food or show them how to do it in a safe, hygienic and compliant

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416 Q 109 (Mark Laurie)
417 Q 50 (Alex Holt)
418 Q 51 (Tom Andrews)
419 Q 50 (Tom Andrews)
420 Written evidence from Blackpool Council (ZFP0036)
421 Written evidence from the Centre for Diet and Activity Research (ZFP0038)

manner. There is a real appetite for people to sell home-cooked food to other people."[422]

311. Allotments could play a role in shaping the physical environment in a healthier way, while also providing an opportunity for individuals to grow and consume nutritious food. Nourish Scotland told us that allotments could produce "very high yields while maintaining a diverse environment and providing social co-benefits"[423] and evidence from Advice NI suggested that councils could have a role in developing local food markets alongside training programmes in horticulture, food nutrition and cooking.[424]

Box 9: Experiences of food insecurity

In a series of phone calls, facilitated by Sustain and Church Action on Poverty, the secretariat spoke with individuals who have experienced food insecurity.

Heather from Newcastle said:

> "Public growing would be good. I've always wanted to have an allotment, but I've never been able to afford to have an allotment because there is a price tag on it. But if there was more space to do it, and less vandals to wreck it, I think that could be a really good idea for seasonal veg to be provided by the community to you are in … . I think it would be brilliant for the community around, even if it's just a small plot of land … ."

Source: See Appendix 5.

312. ***The Government, in partnership with local authorities, should develop a scheme to support food retailer businesses, including those providing fast food, to develop and sell healthy alternatives. It should also determine and provide support to empower other kinds of food providers such as street vendors to sell healthy food in communities.***

Labelling

313. We received some evidence to indicate that food labelling is inconsistent and confusing. Anna Taylor referred to "information asymmetries" in the food system. She stated that: "it is pretty hard for a customer in a shop to work out what they are eating, where it has come from and how it was made, and to know that they are buying what they really want to buy".[425]

Government consultations

314. Calorie and nutrient labelling is voluntary. The Government recommends the use of 'traffic light' labelling. Jenny Oldroyd of the DHSC told us of three different consultations planned by Government on labelling. She said the Government was:

> "looking to introduce calorie labelling in restaurants and cafés in out-of-home settings. We have committed to launching a consultation later this year on the very successful front-of-pack labelling scheme and how we can build on that. We have committed to a consultation early next

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422 Q 111 (Mark Laurie)
423 Written evidence from Nourish Scotland (ZFP0064)
424 Written evidence from Kevin Higgins, Advice NI (ZFP0020)
425 Q 3 (Anna Taylor)

year on the marketing and labelling of infant foods so that we get the presentation of foods right for the youngest children in this country."[426]

315. Given that the Public Health Minister, Jo Churchill MP, confirmed to the Committee that: "one in ten children enters primary school obese, and that rises to one in five by the time they leave"[427] we consider that measures to address the presentation of infant foods must be viewed as an urgent priority. The Government has recognised that:

> "Too many commercially available foods and drinks marketed for infants and young children have labels that do not align with the latest government scientific advice. They can also make a product appear healthier than it really is, or do not contain enough information about how they should be consumed. All of this can be confusing to parents and carers."[428]

The Government also told us that sugar levels in some commercial baby foods and drinks can be very high, and that three in four children aged 4 to 18 months have energy intakes that exceed their daily requirements.[429]

316. ***The Government must publish its consultation on how to address the marketing and labelling of infant food without delay. The responses to that consultation, and the related measures to ensure parents and carers have accurate information on infant food products must be published in 2020.***

317. Jenny Oldroyd also explained that the Department had committed to publishing a response to the consultation on calorie labelling in the out of home sector: "before the end of the year" which would have been December 2019. As of June 2020, no response to this consultation, which closed in December 2018,[430] was available.

318. Professor Jebb explained that food labelling works for two reasons. Firstly, it provides the information required for consumers to make informed healthy choices, and secondly, when labelling is required, businesses choose to lower the calorie count. She said that, "Effectively, you get a population-level impact over and above individuals making better choices".[431]

319. We were told that different groups interact with nutrient labelling differently. Dr Mulrooney, on behalf of the Obesity Group of the British Dietetic Association, told us:

> "Food labels are not necessarily used and understood in the same way by all groups. There is evidence that their use is greater among those with an already greater interest in food and health."[432]

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426 Q 17 (Jenny Oldroyd)

427 Q 119 (Jo Churchill MP)

428 Department of Health and Social Care, *Advancing our health: prevention in the 2020s: consultation document* (22 July 2019): https://www.gov.uk/government/consultations/advancing-our-health-prevention-in-the-2020s/advancing-our-health-prevention-in-the-2020s-consultation-document [accessed 30 June 2020]

429 Written evidence from HM Government (ZFP0079)

430 Department of Health and Social Care, *Calorie labelling for food and drink served outside of the home* (updated October 2018): https://www.gov.uk/government/consultations/calorie-labelling-for-food-and-drink-served-outside-of-the-home [accessed 30 June 2020]

431 Q 62 (Professor Susan Jebb)

432 Written evidence from the Obesity Group of the British Dietetic Association (ZFP0035)

320. We see a strong argument for front-of-pack labelling to be as simple and quick to read as possible. Complicated labels are likely to be of least use to those who most need them. The traffic light system of labelling, which rates different nutrient components as red, amber or green depending on the level of the nutrient, has potential to be simplified further, including by a mandate to present the information in a consistent (and therefore familiar) format. The ability to see at a glance how healthy (or otherwise) a food is could bring important benefits to consumers.

321. Labels on food indicating 'best before' or 'use by' dates do not necessarily provide information that is useful to consumers as to whether food is safe to eat. Guidance from the waste reduction charity, WRAP states that "food past its Best Before date remains safe, and perfectly good to eat for days, weeks, months or even years after the date–depending on the type of food and if it has been stored correctly."[433]. We heard that 'use by' and 'best before' labels lead to confusion among consumers and both food and drinks being thrown away unnecessarily. Analysis of reasons for food waste conducted between 2013 and 2014 found that 16% of avoidable food waste was linked to a date label.[434] Similarly, a poll conducted by Arla Foods found that:

> "Whilst three-quarters (77%) of respondents check food and drink packaging before they purchase, only 15% are confident they can decipher everything on the label. This includes 'best before' and 'use by' dates with over a third (34%) of Brits unsure of the difference, and 11% believing them to be the same thing. This confusion means a third (34%) end up binning food if past its 'best before' date, while another 38% do the same once the product has passed its 'use by' date."[435]

322. Steve Butterworth, CEO of Neighbourly, a surplus food redistribution platform, believed that there was scope to make date labelling clearer. He said that: "Use-by dates have definitely been guilty of fuelling food being thrown away far too quickly, and best-before dates will come in sooner rather than later … A simplification process is required."[436]

323. Date labelling, while useful in retail stock control, is confusing for consumers and leads to unnecessary food waste. The system requires simplification. This is, however, a complicated area to address: simply removing date labelling entirely would require a comprehensive education initiative to ensure that consumers can ascertain whether or not food is safe to eat. The Government must review how consumers can most reliably be informed about when food can be consumed and when it should be thrown away.

324. ***We recommend that the Government conduct a review of labelling on food and drink products. The findings of the review should form the basis of regulations which address both date labelling and the***

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433 WRAP, *Updating Guidance to Food Businesses on the Application of date Marks and Related Advice* (April 2017): https://www.wrap.org.uk/sites/files/wrap/Briefing_note_Updated_guidance_to%20industry_on_date_and_related_labelling.pdf [accessed 30 June 2020]

434 WRAP, *Household food and drink waste: A product focus* (June 2014): https://www.wrap.org.uk/sites/files/wrap/Product-focused%20report%20v5_3.pdf [accessed 30 June 2020]

435 Arla, *Nearly a third of consumers unnecessarily binning food due to label confusion*, (5 September 2019): https://news.arlafoods.co.uk/news/nearly-a-third-of-consumers-unnecessarily-binning-food-due-to-label-confusion [accessed 30 June 2020]

436 Q 49 (Steve Butterworth). 'Best before' dates are more about quality than safety and indicate when food may have passed its prime quality condition: Mr Butterworth was suggesting that these dates err on the side of caution. See also written evidence from City Harvest (ZFP0055).

standardisation and simplification of front-of-pack traffic light labelling. The new regulations should be compulsory for all food manufacturers and retailers.

325. Labelling, however, is not going to rectify the issue of less healthy and unsustainable diets alone. Dr Tara Garnett, Food Climate Research Network Leader, University of Oxford, warned us that there was a danger that the use of labelling can place the responsibility on the consumer and act as a "get-out-of-jail-free card for industry and government".[437] We acknowledge this concern, but agreed with her wider point that it can be a useful tool.

Education and public health messaging

326. It was suggested to us that a lack of knowledge or skill was a limiting factor in access to healthy diets. Much of our evidence suggested that the improved provision of information, through public health messaging or through education initiatives would be a positive step towards removing this limitation. Our evidence identified several possible initiatives and a list of potential benefits to providing this information and training, as well as limitations of this kind of intervention.

327. Some evidence emphasised that a lack of knowledge or skills around healthy eating was a crucial limitation in the ability to access healthy diets. This included the response from LACA, which suggested that there were three reasons for difficulty in accessing healthy diets: time, lack of education and skills, and portion control.[438] Dr Rebecca Sandover explained that food bank clients identified a "general lack of food skills [and] food education"[439] and in a Food Poverty Needs Assessment, the Royal Borough of Greenwich Council identified: "a lack of education around what constitutes healthy eating and the ability to budget correctly to support a healthy diet" as a key barrier affecting people's ability to eat healthy food.[440]

328. Many of our contributors argued strongly that education on healthy diets could be powerful. There was, however, relatively limited consensus around what specific knowledge and skills should be provided by education. Evidence suggested that it could work to teach practical cooking skills,[441] encourage and empower healthy choices,[442] or encourage a sizeable shift in consumption patterns.[443]

329. This evidence indicated that on the whole there were two missing elements: the knowledge of what constitutes a healthy diet and healthy weight, and the skills to prepare nutritious and tasty food. Some evidence suggested that perceptions of what constitutes a healthy diet are inaccurate. Cllr Evelyn Akoto of Southwark Council wrote that: "Across ethnicities, all children's views of what constitutes a healthy balanced diet are at odds with guidelines".[444] Similarly, a 2012 systematic review found that: "Parents are likely to misperceive the weight status of their overweight child", with 62.4%

437 Q 76 (Dr Tara Garnett)
438 Written evidence from LACA (ZFP0048)
439 Written evidence from Dr Rebecca Sandover (ZFP0056)
440 Written evidence from the Royal Borough of Greenwich Council, Corporate Services (ZFP0015)
441 Written evidence from Dr Clare Pettinger assisted by members of the Food Plymouth Partnership (ZFP0033)
442 Written evidence from Dr Kayleigh Garthwaite (ZFP0022)
443 Written evidence from Leeds Food Aid Network (ZFP0018)
444 Written evidence from Cllr Evelyn Akoto, Cabinet Member for Community Safety and Public Health, Southwark Council (ZFP0024)

of overweight children incorrectly perceived as having normal weight by their parents.[445] Limited skills to prepare nutritious food was also identified by much of our evidence. Writing on behalf of the Obesity Group of the British Dietetic Association, Dr Hilda Mulrooney pointed to a lack of education on cooking skills which she said: "resulted in a generational loss of knowledge with impacts far beyond the individual affected"[446]. Bags of Taste also suggested that a lack of confidence in cooking is crucial for those on low incomes: "the idea that they may be able to cook something at home that is both tasty and affordable seems to them highly unlikely."[447]

330. The national curriculum includes cooking and nutrition as part of Design and Technology. This is compulsory in maintained schools from Key Stages 1 to 3 and from September 2020, health education will be compulsory in all state-funded schools. It was clear that there is potential for schools to build on these mandated elements to further increase knowledge and skills relating to healthy lifestyles and nutrition and food preparation. The Nuffield Council on bioethics argued that schools were well placed for this role:

> "Schools provide an important means of influencing many of the sociocultural factors that have a lasting impact on both food choices and exercise habits. They have a prominent role in the community, are a source of support for parents and families, and can produce community change in environments, knowledge, and behaviour".[448]

Several examples of positive education around skills and healthy eating were provided to us. Blackpool Council pointed to their Give Up Loving Pop campaign, which it estimated had led to 10,564 days free of sugary or fizzy drinks for children involved with a 21 day challenge[449], and the Soil Association pointed to their 'Food for Life' awards scheme which promoted healthier food and food education within schools. There was some demonstrable success in this programme, and the Soil Association have estimated that: "If every primary school in the UK was a Food for Life school, a million more children would be eating their five-a-day each day".[450]

331. Schools must be adequately resourced to further increase knowledge and skills on nutrition and food preparation. Chapter 1 of the Childhood Obesity Plan recognised that: "Schools are a vital part of our plan, and have opportunities to support healthier eating, physical activity and to shape healthy habits."[451] An important part of schools contribution in reducing childhood obesity is in providing the skills and knowledge required for healthy lifestyles and diets. There are, however, many (and—due to the COVID-19 outbreak—increasing) demands on schools' budgets and capacities.

445 Marloes Rietmeijer-Mentik, et al, 'Difference between parental perception and actual weight status of children: a systematic review', *Maternal & Child Nutrition* vol 9, Issue 1, (October 2012): https://onlinelibrary.wiley.com/doi/full/10.1111/j.1740–8709.2012.00462.x [accessed 30 June 2020]

446 Written evidence from Dr Hilda Mulrooney, Obesity Group of the British Dietetic Association (ZFP0035)

447 Written evidence from Bags of Taste Limited (ZFP0029)

448 Written evidence from the Nuffield Council for Bioethics (ZFP0045)

449 Written evidence from Blackpool Council (ZFP0036)

450 Written evidence from the Soil Association (ZFP0016)

451 HM Government, *Childhood Obesity: A Plan for Action* (August 2016), p 8: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/546588/Childhood_obesity_2016__2__acc.pdf [accessed 30 June 2020]

332. Existing models to support healthy lifestyles could reduce the financial burden on schools while still enabling them to play an increasingly active role in reducing childhood obesity. The Primary PE and Sport Premium, for example, offers an easily transferable model. The premium provides direct and ring-fenced funding to make additional and sustainable improvements to the quality of their physical education, physical activity and sports.[452] This could be used as a basis to improve the quality of education on healthy diets. Another possible solution is to fund a small number of professionals in a local area to engage with schools and facilitate classroom and skills-based learning on healthy and sustainable diets. Ideally, access to these resources should be available to all schools, but there is scope to target areas with the highest levels of deprivation or childhood obesity. A Government scheme, along the same lines as we have suggested for the Holiday Activities and Food programme, could facilitate this and effect real improvement in children's health, including a reduction in childhood obesity levels.

333. **We note the potential and applaud the success of school-based schemes to encourage healthy lifestyles. We urge local authorities and school leaders, in discussion with classroom teachers, to build on the foundation already provided by the National Curriculum to integrate further education on healthy lifestyles into their offer.**

334. The power of public health messaging on healthy choices was highlighted. Many of our contributors argued that, properly harnessed, this could shift consumption habits to be healthier. Clearly, if people are to eat a healthy diet, knowledge of what constitutes a healthy diet is essential. The Change4life information campaign which suggests "easy ways to eat well and move more"[453] was raised as an example of a successful scheme.[454] Professor Jebb said that: "It has created a lot of trust in the brand. It has relayed some consistent messaging. If we did not have it, we would probably be saying we should do it."[455]

335. There was a consensus that public health messaging should be carefully tailored to the intended audience. Dr Christian Reynolds argued that "information and education campaigns need to be tailored to different dietary patterns (and income groups) to be effective".[456] Alex Holt of Food Active told us that: "Current public health messages are very middle class. We need to make sure that they are more tailored to those on low incomes and, perhaps, those from religious and racial minority ethnicities."[457] We were also told by Health Action Campaign that "between 43% and 61% of working age adults routinely don't understand health information".[458] There is a body of work that remains to be done to ensure that public health messaging is clear and easy to understand.

336. **There is potential for increased investment in targeted public health messaging to help to encourage a shift towards healthier consumption patterns.**

452   Department for Education, *PE and sport premium for primary schools* (November 2019): https://www.gov.uk/guidance/pe-and-sport-premium-for-primary-schools [accessed 30 June 2020]

453   NHS, Change4Life: https://www.nhs.uk/change4life [accessed 30 June 2020]

454   Written evidence from City Harvest (ZFP0055)

455   Q 62 (Professor Susan Jebb)

456   Written evidence from Dr Christian Reynolds (ZFP0077) and Association of Convenience Stores (ZFP0050)

457   Q 47 (Alex Holt)

458   Written evidence from Health Action Campaign (ZFP0046)

337. One measure suggested by much of our evidence was the increased advertising of healthy foods. Many witnesses pointed to the success of the VegPower initiative to advocate for more public health advertising. Mr Percival stated: "We need to level the playing field by tackling the overspend on junk food advertising and increasing the spend on fresh food advertising."[459] Henry Dimbleby, National Food Strategy Review Lead, expressed his interest in public health advertising and referred to the advertising programme for vegetables, VegPower:

> "VegPower is amazing … All the kids were excited by it. My son was talking about it last night at the table; he just brought it up. He said, "Do you remember that bit where—? Could you link money in some way to adverts so that you could advertise more of the good stuff? Could you force people to advertise good stuff? There are all sorts of ways in which you might change advertising. We need to get creative. It is a huge amount of money, so we need to think carefully about that."[460]

How effective is food related education and public health messaging?

338. It was suggested that the impact of public health messaging and education is limited. There were several components to this argument, including:

- Some witnesses argued that messaging and information campaigns are relatively ineffective because change based on them requires individual action. Dr Vogel told us that this kind of intervention has "a limited effect on population-level change".[461] Professor Dominic Harrison and Emma Savage, both of Blackburn with Darwen Council, stated that: "Education and information interventions always putting the onus on the individual does not work when people are short of both money, time and resilience".[462] That knowledge does not equal behavioural change is evidenced by the 5 a day campaign which while well-known, communicates standards that are far from being met.[463]

- Information campaigns and education do not address or remove many difficulties in accessing healthy diets. Factors outlined in chapters three and four, such as cost, physical accessibility, aggressive marketing and the availability of cheap healthy food are not addressed by providing more knowledge. As Dr Clare Pettinger told us: "Evidence shows that people do know about healthy eating (e.g. knowledge of 5 a day and/or 'healthier foods'), but they do not always have the (financial) means to follow healthy eating guidelines (due to low income, or family circumstances".[464] Teaching children about healthy eating at school, for example, does not address the other issues which prevent healthy diets: "children are often well informed and educated but with working parents, time and financial constraints healthy options are still not being given at home".[465]

459 Q 89 (Rob Percival)
460 Q 103 (Henry Dimbleby)
461 Q 13 (Dr Christina Vogel)
462 Written evidence from Professor Dominic Harrison and Emma Savage (ZFP0027)
463 Q 13 (Dr Christina Vogel)
464 Written evidence from Dr Clare Pettinger assisted by members of the Food Plymouth Partnership (ZFP0033)
465 Written evidence from City Harvest (ZFP0055)

- Some witnesses told us that interventions which require individual choices and changes could increase inequalities and that this is particularly the case when interventions make greater demands on individuals that require them to exert considerable effort ('agency') to achieve a successful outcome. The Centre for Diet and Activity Research summarised:

  "High-agency' interventions include education and information campaigns. High-agency population approaches may be most effective in more affluent groups, and so may exacerbate existing inequalities. In contrast, 'lower-agency' population approaches such as reformulation, price changes and advertising restrictions are likely to be the most effective and equitable solutions."[466]

  Others agreed, arguing that lower-risk population groups were more likely to engage with public health messaging,[467] although this was not a universal view: Professor Jebb, for example, pointed to the successful Change4Life campaign to argue that targeted information campaigns can have substantial impacts on high-risk groups [468]

339. **Increasing public understanding of what constitutes a healthy and sustainable diet is an important element of efforts to improve the population's diet. Interventions designed to communicate information about food and nutrition must be adapted according the audience they are trying to reach. Crucially, they will be most successful when accompanied by other measures to address the underlying problems highlighted in this report which make it difficult to access healthy diets.**

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466   Written evidence from the Centre for Diet and Activity Research (ZFP0038)
467   Written evidence from The Institute of Developmental Sciences, Faculty of Medicine, University of Southampton, MRC Lifecourse Epidemiology Unit and the NIHR Biomedical Research Centre, University of Southampton and University Hospital Southampton NHS Foundation Trust (ZFP0080) and Health Action Campaign (ZFP0046)
468   Q 62 (Professor Susan Jebb)

CHAPTER 5: REFORMULATION AND REGULATION

340. The previous chapter set out how factors within the 'food environment' can drive dietary choices. We have argued that there is a clear and compelling argument for controlling what many see as the 'aggressive' marketing and promotion of less healthy food, and for reshaping the food environment to support healthier choices.

341. The food environment can have a profound effect on consumer choice, but clearly, so can the types of product that are made available. Our attention was drawn repeatedly to the prevalence of products high in energy, unhealthy types of fat, salt or sugar, commonly associated with highly processed foods. It bears repeating that these types of foods are much more likely to be on promotion, making them appealing to those on a tight budget[469], and that a high proportion of both adults and children's dietary energy comes from highly processed food.[470] We also eat more processed products than other European countries.[471] We are, as Anna Taylor suggested, "heavily dependent on those foods."[472]

342. The general consensus was that interventions which make minimal demands on individuals and are delivered to whole populations are considered to be more effective in driving public health improvements, than approaches that aim simply to encourage individuals to change their behaviours. As such, many witnesses highlighted that government-led reformulation programmes have the potential to be a powerful lever in enabling healthier diets and improving health outcomes. As levels of food insecurity and health inequalities were a central concern of this inquiry and given the potential that reformulation has for delivering equitable effects across the whole population, it was important for us to consider that merits of different approaches to encouraging industry to reformulate their products to make them healthier.

343. The Government certainly appears to have put a good deal of faith in the ability of reformulation programmes to drive improvements in public health, with voluntary sugar and calorie reduction forming key components of Chapter 2 of the Childhood Obesity Plan. Further commitments to salt, sugar and calorie reduction were outlined in its 2019 Green Paper on prevention, which stated that: "Central to our approach to improving diets is working with food and drink companies to make their products healthier."[473]

344. The evidence we received was broadly in agreement that government-led reformulation programmes can be effective in tackling excess levels of fat, sugars and salt in processed foods, and should play a key role in continuing efforts to improve dietary health. There were, however, serious concerns raised about the limitation of reformulation, both in how effectively reformulation programmes have been implemented and adhered to, and to what extent reformulation should be relied upon to deliver the public health

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469 Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073)

470 *Ibid.*

471 Written evidence from the Univerity of Southampton and the MRC Life Course Epidemiology Unit Southampton General Hospital (ZFP0080)

472 Q 4 (Anna Taylor)

473 Department of Health and Social Care, *Advancing our health: prevention in the 2020s:consultation document,* CP 110 (July 2019): https://www.gov.uk/government/consultations/advancing-our-health-prevention-in-the-2020s/advancing-our-health-prevention-in-the-2020s-consultation-document [accessed 30 June 2020]

improvements that are so urgently required. Witnesses emphasised that reformulation should not be relied on too heavily as part of effort to improve dietary health. Shirley Cramer from the Royal Society for Public Health, said on reformulation:

> "We feel, with others, that it is part of the mix of the things we need to do to tackle obesity and promote healthy eating. It is for the researchers to look at how big a part it is, but we cannot see it as the main plank of what the UK needs to do to solve the obesity crisis."[474]

345. There was a further concern expressed by others that reformulation is a sticking plaster when a more widescale shift in the food environment is required. This view was articulated most clearly by Professor Jebb:

> "If we are fundamentally to address the very big issues this Committee is focused on, we have to make bigger changes in the way people eat. We cannot do it just by fiddling around when changing the composition of the things that people currently eat. We have to eat fewer biscuits and cakes, less chocolate and confectionery, and more fruit and vegetables. You are not going to achieve that through reformulation."[475]

346. The representatives from food retail and manufacturing sectors that we heard from were keen to emphasise their willingness to help reduce the availability and appeal of less healthy food. While we acknowledge that there is some encouraging work underway by individual companies and organisations to reformulate their products, the Government's assessments of industry progress against its reformulation targets show that significant improvement is required. The food industry is highly competitive and, although SMEs make up a significant proportion of food businesses, the industry as a whole is dominated by the major supermarkets and by large multi-national food manufacturers. The fact that industry progress against voluntary reformulation targets has been limited suggests that many manufacturers and retailers are not yet fully engaged in efforts to reduce harmful levels of less healthy ingredients. The industry needs to take more responsibility for the products it produces, manufactures, and sells to the consumer. Industry has the power and the capability to make positive changes to the dietary health of the nation but where it fails to do so, the Government must intervene.

347. Professor Susan Jebb suggested that the Government was placing too much faith in reformulation: "Unfortunately, the Government have decided that reformulation is the answer".[476] Requiring industry to make their products healthier is a key element of Public Health England's strategy in relation to obesity. As such, it was important to consider if there are opportunities to strengthen existing reformulation programmes, and to learn from the (in some cases) not insignificant success of others.

Existing reformulation measures

348. Food reformulation is defined as the re-designing of an existing processed food product with the objective of making it healthier. A key benefit to this approach is that the nutritional composition of food and drink can gradually improve. This has the potential to impact on the whole population, including

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474   Q 61 (Shirley Cramer)
475   Q 61 (Professor Susan Jebb)
476   Ibid.

children and regardless of population subgroup. Crucially, it was argued, this type of intervention does not require any behaviour change in individuals.

349. The key reformulation measures introduced by the Government include:

- The Salt Reduction Programme. Salt targets were first introduced by the government in 2006, challenging the industry to reduce salt in everyday foods. In 2003, the Scientific Advisory Committee on Nutrition (SACN) recommended that salt intake should be reduced to no more than 6 grams per day for adults.[477] Following this, the Food Standards Agency (FSA) set salt reduction targets for food and drinks to be met by 2010. In 2010, responsibility for nutrition transferred from the FSA to the Department of Health. According to Public Health England: "To date, four sets of targets have been published (2006, 2009, 2011 and 2014), covering up to 80 individual product types."[478]

- The Soft Drinks Industry Levy (SDIL). Announced in March 2016, the SDIL is a tax on soft drinks that contain more than 5 g sugar per 100 millilitres, with a higher rate on drinks with more than 8 grams per 100 millilitres. Fruit juices and milk-based drinks were exempt from the levy. The stated aim of the SDIL was to encourage the soft drinks industry to improve the healthiness of the drinks they produce, by reducing sugar content or reducing portion sizes. The SDIL was implemented in April 2018.[479]

- The Sugar Reduction programme. In August 2016 the Government's Childhood Obesity: A plan for action included a commitment for Public Health England (PHE) to oversee a sugar reduction programme. This challenged all sectors of the food industry to reduce sugar in their products by 20% by 2020. Industry was also challenged to achieve a 5% reduction in the first year of the programme.[480]

350. The Government is also developing measures for a wider calorie reformulation programme. It has consulted on measures relating to product ranges aimed at babies and young children, and has undertaken a programme of engagement with the eating out of home sector.[481]

351. There was some discrepancy in the evidence about how targets on reformulation should be applied. The main argument centred around whether voluntary or mandatory interventions were more likely to deliver the necessary improvements in public health. There was some acknowledgment of the achievements voluntary reformulation programmes have been able to make, in particular for salt, but concern was expressed that mandatory

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477 Scientific Advisory Committee on Nutrition, Salt and Health (April 2003), p ii: https://assets. publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/338782/SACN_ Salt_and_Health_report.pdf [accessed 30 June 2020]

478 Public Health England, Salt Reduction Programme PHE's first assessment of the food industry's progress towards meeting the government's salt reduction targets (December 19 2018): https:// publichealthengland.exposure.co/salt-reduction-programme [accessed 30 June 2020]

479 HM Revenue and Customs, Soft Drinks Industry Levy (December 2016): https://www.gov.uk/ government/publications/soft-drinks-industry-levy/soft-drinks-industry-levy [accessed 30 June 2020]

480 Public Health England, Sugar reduction and wider reformulation, (20 September 2019): https://www.gov. uk/government/collections/sugar-reduction [accessed 30 June 2020]

481 Public Health England, Reduction and reformulation programme: Spring 2019 update (10 May 2019): https://www.gov.uk/government/publications/reduction-and-reformulation-programme-spring-2019- update/reduction-and-reformulation-programme-spring-2019-update#out-of-home-engagement [accessed 30 June 2020]

reformulation measures may be required if significant progress is not made. There was considerable support expressed for the Soft Drinks Industry Levy, and the potential for fiscal measures to encourage industry more forcibly to reformulate their products, with some calling for this approach to be extended to cover other nutrients, food groups and products. The evidence did not, however, dismiss voluntary measures entirely, with some witnesses making suggestions on how voluntary measures might be improved to ensure greater levels of adherence to reduction targets.

Voluntary reformulation programmes

352. Both the Salt Reduction Programme and the Sugar Reduction Programme set voluntary reformulation targets for certain processed foods. Voluntary salt reduction targets have been in place since 2006 and sugar targets were first set for industry in 2016.[482]

Salt reduction

353. The salt reduction programme was cited as an example of a successful reformulation programme. Professor Susan Jebb told us that: "Reformulation has been a huge success story, in which the UK has had real leadership. It started with the salt reduction programme, which continues today and has been extraordinarily effective."[483] Similarly, the Nuffield Council on Bioethics told the Committee that:

> "There have been a number of voluntary initiatives directed at the food industry to create healthier products, primarily aimed at reducing sugar, salt, saturated fats, and/or trans-fats. Many of these voluntary initiatives have shown that much can be achieved through self-regulation. For example, seven-to-eight years after the introduction of the Food Standards Agency's voluntary salt reduction programme, the salt content of many food products was reduced through reformulation, alongside the introduction of a number of low-salt versions of products to the market."[484]

354. Jenny Oldroyd from the Department of Health and Social Care told us that:

> "The salt reduction programme has also made gains in reducing salt in foods. Between 2005 and 2011 we saw salt decrease in foods by 11%, from 8.8 grams to 8 grams per day on average. We saw really big gains in particular foods. Bread, for example: that programme resulted in 40% less salt on average in bread in this country."[485]

355. It was suggested that the initial success of the programme was due to effective monitoring by the Food Standards Agency, which allowed it to hold companies to account and to drive improvements in salt reduction. Mhairi Brown from Consensus Action on Salt, Sugar and Health, stated that the Food Standard Agency's salt reduction programme was:

> " … robust and well monitored, and it became a model for salt reduction programmes around the world. We saw transparent and publicly

482 Public Health England, *Salt Reduction Programme, PHE's first assessment of the food industry's progress towards meeting the government's salt reduction targets* (December 2018): https://publichealthengland. exposure.co/salt-reduction-programme [accessed 30 June 2020]
483 Q 61 (Professor Susan Jebb)
484 Written evidence from Nuffield Council on Bioethics (ZFP0045)
485 Q 25 (Jenny Oldroyd)

published monitoring reports, which made it much easier to hold the food industry to account …"

"It was so successful that the salt content of many products decreased by about 40% and the public were not aware of that. They still continued to buy the same products. It had a huge impact on population blood pressure."[486]

356. The support expressed for the salt reduction programme was, however, frequently caveated by the assertion that initial progress made by the programme in the early 2000s was not subsequently sustained. Susan Lloyd, Executive Lead for Policy at the Faculty of Public Health, stated that:

"Our view at the faculty is that the salt and sugar levies have been effective. However, they have now stalled, primarily because they were voluntary agreements … The salt reduction process has stalled, certainly, when it comes to reductions in formulated salt in products."[487]

357. A number of witnesses expanded on this and identified the transfer of responsibility from the FSA to the Department of Health, (which placed salt reduction under the Public Health Responsibility Deal) and eventually to Public Health England, as a turning point when the momentum on salt reduction was lost. The Nuffield Council on Bioethics was amongst the organisations that noted this shift, stating that:

"… seven-to-eight years after the introduction of the Food Standards Agency's voluntary salt reduction programme, the salt content of many food products was reduced through reformulation, alongside the introduction of a number of low-salt versions of products to the market. However, later figures published by Public Health England showed a more mixed picture for the food industry's progress in meeting the Government's salt reduction targets."[488]

358. It was argued that the transfer of responsibility resulted in a decline in pressure from the Government on the food industry. The key criticism to emerge was that, while the FSA publicly monitored industry progress on salt reduction, the bodies that have subsequently overseen salt reduction have not. The Public Health Responsibility Deal was criticised for lacking robust or independent target setting, monitoring and enforcement mechanisms as it made "the food industry responsible for making progress by itself without giving it the leadership and support to enable that."[489] Consensus Action on Salt, Sugar and Health claimed that:

"Salt reduction has stalled since the removal of strict monitoring by the Food Standards Agency to be replaced by little to no monitoring under the Public Health Responsibility Deal in 2011"[490]

359. Jenny Oldroyd told the Committee that:

"The salt reduction programme has also made gains in reducing salt in foods. Between 2005 and 2011 we saw salt decrease in foods by

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486 Q 68 (Mhairi Brown)
487 Q 61 (Susan Lloyd)
488 Written evidence from the Nuffield Council on Bioethics (ZFP0045)
489 Q 68 (Mhairi Brown)
490 Written evidence from Consensus Action on Salt, Sugar and Health (ZFP0053)

11%, from 8.8 grams to 8 grams per day on average. We saw really big gains in particular foods. Bread, for example: that programme resulted in 40% less salt on average in bread in this country."[491]

360. In March 2020, Public Health England published its 2018/19 urinary sodium survey, which looks at population salt intake, rather than the industry's progress on meeting salt targets. The latest PHE report revealed that salt intakes had not significantly changed since they were last measured in 2014. The report found that the mean estimated salt intake for adults was 8.4 grams per day (40% higher than the Government recommended maximum of 6 grams a day).[492]

361. PHE's latest report does appear to support the assertion the progress on salt reduction has slowed, though we acknowledge the possibility that success is easier to achieve earlier on in a reformulation programme. What is more certain is that reporting against progress on population salt intake has been patchy. Until the 2019 urinary sodium survey, UK population salt intake had not been measured since 2014.[493] If urinary sodium levels were cross-referenced against information on the salt content of products, it could be ascertained whether the apparent stalling in progress relates to reformulation or to consumer behaviour.

362. Public Health England stated that its first assessment of the food industry's progress towards meeting the government's salt reduction targets (published in December 2018) showed a "mixed picture overall". In the in-home sector, PHE reported that:

- Just over half (52%) of all the average salt reduction targets set were met by 2017. Retailers made more progress than manufacturers towards achieving average targets, meeting 73% of these compared with manufacturers meeting 37%;

- All average salt targets were met in 9 food categories, including breakfast cereals and baked beans, however, meat products met none of these targets; and

- Overall (for retailers and manufacturers combined), where maximum targets were set, 81% of products had salt levels at or below their target (retailers 86%, manufacturers 72%).[494]

363. The Government told us that it is revising its targets for the salt reduction programme. The Department of Health and Social Care acknowledged that: "While our consumption has decreased over the last decade, we are still having too much salt and there is a long way to go. To achieve this, we will

491 Q 25 (Jenny Oldroyd)
492 Public Health England, *National Diet and Nutrition Survey, Assessment of salt intake from urinary sodium in adults (aged 19 to 64 years) in England, 2018–2019* (March 2020), p 6: https://assets.publishing. service.gov.uk/government/uploads/system/uploads/attachment_data/file/876252/Report_England_ Sodium_Survey_2018-to-2019__3_.pdf [accessed 30 June 2020]
493 Action on Salt, 'Action on Salt Position: UK Salt Reduction Strategy': http://www.actiononsalt.org. uk/about/position-statements/uk-salt-reduction-strategy/ [accessed 30 June 2020]
494 Public Health England, *Salt target 2017: Progress report, A report on the food industry's progress towards meeting the 2017 salt targets* (December 2018), pp 4–5: https://assets.publishing.service.gov.uk/ government/uploads/system/uploads/attachment_data/file/765571/Salt_targets_2017_progress_ report.pdf [accessed 30 June 2020]

publish revised salt reduction targets in 2020 for industry to achieve by mid-2023 and we will report on industry's progress in 2024."[495]

Sugar reduction

364. The evidence on the progress of the sugar reduction programme was similarly pessimistic. The Government has set a target for the food industry to reduce the sugar in its products by 20% by 2020, with 5% in the first year of the programme (August 2016 to August 2017).[496] Public Health England published its second-year report on the industry's progress on meeting the government targets on sugar reduction in 2019. It stated that:

- Between 2015 and 2018 there has been an overall 2.9% reduction in total sugar content (sales weighted average in grams per 100 grams) among retail and manufacturer branded products (in-home sector).

- More progress has been achieved in specific food categories, particularly for breakfast cereals (8.5% reduction), and for yogurts and fromage frais (10.3% reduction);

- Overall the total tonnes of sugar sold in foods included in the reformulation programme from the in-home sector has increased by 2.6% between 2015 and 2018 (excluding cakes and morning goods), whereas the sugar sold in soft drinks subject to SDIL has decreased by 21.6%.[497]

The Public Health Minister, Jo Churchill MP, referring to the sugar reduction programme said:

"Some categories are lagging behind. The most notable is that we have not seen much advance in confectionery at all."[498]

365. In fact, according to Public Health England's progress report in the retailer own brand and manufacturer branded products there were small increases for some categories (puddings and ice cream, lollies and sorbets). In the out of home sector products there were some more significant increases, including a 21.9% increase reported for chocolate confectionery.[499]

366. Speaking about the likelihood of the Government meeting its target of a 20% reduction by 2020, Professor Jebb stated that: "There is no way we are going to achieve that."[500]

367. Echoing criticisms levelled at the salt reduction programme, efforts to reduce levels of sugar in the population's diet were criticised for lacking any mechanism to encourage adherence to the targets. Dr Hilda Mulrooney from the Obesity Group of the British Dietetic Association, stated that:

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495 Written evidence from HM Government (ZFP0079)

496 Public Health England, *Sugar Reduction Programme, Progress made by industry in the first year* (22 May 2018): https://publichealthengland.exposure.co/sugar-reduction-programme [accessed 30 June 2020]

497 Public Health England, *Sugar Reduction: Report on progress between 2015 and 2018* (September 2019) p 6: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839756/Sugar_reduction_yr2_progress_report.pdf [accessed 30 June 2020]

498 Q 120 (Jo Churchill MP)

499 Public Health England, *Sugar Reduction: Report on progress between 2015 and 2018* (September 2019) p 8: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839756/Sugar_reduction_yr2_progress_report.pdf [accessed 30 June 2020]

500 Q 61 (Professor Susan Jebb)

> "With the voluntary sugar programme, all that was said was that, if sufficient progress had not been achieved by 2020, additional levers might be used. There is no clarity about what those levers are, so it is perhaps more difficult for industries to engage with it, or they do not see the need to engage with it. So far there is no stick. You either engage with it or you do not."[501]

368. Mhairi Brown later emphasised that: "A voluntary programme is only effective if it is well monitored and there is buy-in across the sector."[502]

Voluntary reformulation programmes: conclusions

369. Overall, the potential for voluntary reformulation programmes to deliver improved health outcomes was not dismissed entirely in favour of mandatory approaches. It was, however, made clear that voluntary reformulation programmes can only be effective if they are supported by close monitoring and clear leadership from the Government. Given that the salt reduction programme was able to demonstrate significant success in the past, there is a reasonable case to be made that it could be revived, through introducing more transparent and regular monitoring and stronger accountability for industry to adhere to the targets set. Getting the food industry to commit to the voluntary programmes is also critical. The limited evidence on the success of the Government's voluntary reformulation programmes on salt and sugar reduction show that, as a whole, the industry is a significant way off meeting the Government's reduction targets. This suggests that some in the industry will not make the effort to participate in the programmes, or will even avoid participating in them entirely, unless they are made to. This point is further reinforced by the evidence on the success of the Soft Drinks Industry Levy in reducing the amount of sugar in drinks, versus the limited progress that has been made with other products that fall under the voluntary sugar reduction programme.

370. Many witnesses made the case that voluntary measures will always be limited as they cannot effectively incentivise all companies across the industry. Witnesses (including some industry representatives) expressed the need for a level playing field, which many argued could only be achieved through regulation. The Nuffield Council on Bioethics, for example, concluded that:

> "Much can be achieved through self-regulation of the industry. However, where self-regulation fails to deliver, regulation can be necessary as an effective driver of change."[503]

Mandatory reformulation

371. A number of witnesses cited their support for the Soft Drinks Industry Levy (SDIL). Sustain were one of many to highlight the successes of the levy, stating that: "The key measure to be implemented has been the introduction of the Soft Drinks Industry Levy which has removed 90 million kg of sugar from drinks since 2017."[504]

372. Public Health England's assessment of the SDIL found that there had been:

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501 Q 68 (Dr Hilda Mulrooney)
502 Q 68 (Mhairi Brown)
503 Written evidence from Nuffield Council on Bioethics (ZFP0045)
504 Written evidence from Sustain (ZFP0071)

- A 28.8% reduction in total sugar content per 100ml between 2015 and 2018 for the drinks subject to be included in the SDIL among retailer own brand and manufacturer branded products;

- An increase in sales of drinks subject to the levy of 10.2%, but a reduction in the total sugar content in the drinks sold of 21.6%;

- A shift in the volume of sales towards low sugar products (below 5g per 100ml) with no levy attached;

- A decrease in total sugar purchased from drinks subject to the SDIL per household among all socio-economic groups.[505]

373. Some witnesses also highlighted that the Government received far less revenue from the levy than had been anticipated, an indication that it had been successful in incentivising manufacturers to reformulate their products to avoid paying the fee.[506]A study, supported by the National Institute for Health Research (NIHR), which analysed stock market returns of soft-drink companies listed on the London Stock Exchange, found that they have continued to experience positive growth in their share prices during the implementation of the SDIL.[507] Dr Hilda Mulrooney stated that:

> "The soft drinks industry levy has shown that, with the 28.8% reduction in sugar between 2015 and 2018, there has at the same time been an increase in the soft drinks that are being consumed. More of them are being consumed from the lower no-sugar category, so that suggests that it is possible to achieve meaningful gains while still protecting the right of industry to make a profit. It is an important market for the country. It is an important part of the economy of the country, so industry must be protected, but not at the expense of children."[508]

374. Many concurred with Mhairi Brown's view that: "the scale of progress that has been made under the levy shows what kind of progress is possible if the Government are able to show leadership and state their priorities clearly."[509] There were consistent calls to extend the SDIL in line with the Government's proposals to include a wider range of products, and for the Government to assess where fiscal measures might be applied elsewhere to help drive public health improvements. Cancer Research UK asked that:

> "When the [Soft] Drinks Industry Levy (SDIL) is reviewed in 2020, the UK Government should commit to extending the levy to sugar-sweetened milk-based drinks and consider tightening current sugar thresholds to encourage further reformulation. The UK Government should also work with devolved administrations to continue to build the evidence on fiscal measures and explore how these policies can aid reformulation and change business and consumer behaviour."[510]

505 Public Health England, *Sugar Reduction: Report on progress between 2015 and 2018* (September 2019) p 9: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839756/Sugar_reduction_yr2_progress_report.pdf [accessed 30 June 2020]

506 HM Treasury, *Soft Drinks Industry Levy comes into effect*, (5 April 2018): https://www.gov.uk/government/news/soft-drinks-industry-levy-comes-into-effect [accessed 30 June 2020]

507 National Institute for Health Research, *Sugar tax had no lasting negative impacts on the UK soft drinks industry*, (25 February 2020): https://www.nihr.ac.uk/news/sugar-tax-had-no-lasting-negative-impacts-on-the-uk-soft-drinks-industry/24156 [accessed 30 June 2020]

508 Q 69 (Dr Hilda Mulrooney)

509 Q 68 (Mhairi Brown)

510 Written evidence from Cancer Research UK (ZFP0043)

375. The Public Health Minister, Jo Churchill MP, informed the Committee that:

> "The Government has also committed to consider the sugar reduction progress achieved in sugary milk-based drinks as part of its 2020 review of the milk drinks exemption from the SDIL. Sugary milk drinks may be included in the SDIL if insufficient progress on sugar reduction has been made."[511]

376. The evidence also included calls for the Government to reconsider the zero-rated VAT status of some food products. Professor Susan Jebb argued that:

> "The obvious immediate place you could take action would be on VAT. There are ridiculous anomalies that do not help the health agenda. Why do cakes not have VAT on them? That seems to me very easy to fix. If the price of cakes went up by 20%, you would probably see something of the order of a 15% to 20% reduction in consumption."[512]

Dr Hilda Mulrooney highlighted that extending taxation on certain foods could impact on consumer practices, stating that:

> "If the product price is raised by about 20% due to taxation, it seems to effect behaviour change in consumers. That will generate less income from taxation because people stop buying products that are subject to the levy. As regards income for the Government it is not a great approach, but in consumer behaviour it seems to be."[513]

377. Following the UK's exit from the European Union we consider that there is a clear opportunity for the Government to review VAT rates on food and drink to help to rebalance the cost of food and drink in favour of healthier products.

378. ***The Government should review the current zero-rated VAT arrangements on some food products which are known to be energy dense, and contain high levels of salt, sugar and unhealthy types of fat. It should commence this review before the end of the transition period in 2020.***

The Industry View

379. There was broad agreement that that the food industry should be taking more responsibility for promoting healthy and sustainable diets. We consider this an entirely reasonable argument, given that it is the food processors and manufacturers that create and produce highly processed food products. However, with both voluntary and mandatory approaches to reformulation, it was clear that some level of industry buy-in is required. Industry representatives were able to highlight some of the difficulties and limitations of reformulation from their perspective.

Barriers to reformulation

380. Industry representatives and others highlighted that reformulation is different across different food products, with some products easier to change than others. Professor Susan Jebb highlighted, for example, that: "Sugary drinks are relatively easy. You can replace the sugar with artificial sweeteners or just

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511 Supplementary written evidence from DHSC (ZFP0097)
512 Q 66 (Professor Susan Jebb)
513 Q 68 (Dr Hilda Mulrooney)

make the drinks less sweet"[514] but other products are not as easy to change. Dr Hilda Mulrooney explained that "sugar in other foods has structural properties as well."[515] Kate Halliwell from the Food and Drink Federation explained the success of the SDIL might not be able to be replicated in other products, stating that: "Trying to translate that to a cake, where sugar has a much more structural role, would be much more difficult."[516]

381. Industry representatives also suggested that two components of the government obesity proposals—reformulation targets and restrictions on the advertising of HFSS products—were, in some cases, working against each other. Nestlé UK&I highlighted that the Government's restrictions on the advertising of products categorised as HFSS:

> "… do not distinguish between those whose nutritional profile have been improved and those that have not, meaning producers are faced with the possibility of being unable to showcase the healthier alternatives."[517]

It was suggested that this deters companies from reformulating their products, posing a dilemma for companies when considering whether to invest in reformulation. Kate Halliwell from the Food and Drink Federation explained that:

> "A company trying to decide now what to do, given how long it takes to reformulate, would not be able to promote or advertise 30% reduced confectionery. If you were trying to develop a product and invest a lot of money in it, it would raise a question as to whether you should or not. How do you successfully bring something to market?"[518]

382. There were also concerns expressed over the lack of clarity over what measures will be introduced next, caused in part by the fact a number of government proposals on improving dietary health have been announced through the three Childhood Obesity chapters, but not yet implemented. Kate Halliwell highlighted that: "We have had three childhood obesity plans in two years. Inevitably, that means that civil servants are processing that work, and we are just catching up with the announcements all the time."[519]

383. Various witnesses referred to Scottish and Welsh efforts to support businesses (particularly SMEs) to reformulate their products in a healthier way. The Food and Drink Federation told us that:

> "In Scotland, they fund a reformulation manager post to engage with those companies. In Wales, there are food centres that look across the piece more broadly. It is not just reformulation but sustainability issues, and packaging comes into it as well. They have specifically said that they are going to uplift the money to help companies on reformulation. In England, we do not have an equivalent for that."[520]

384. Given that the food industry is made up of a complex range of businesses, with a significant number of SMEs, the argument that the Government should

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514 Q 61 (Professor Susan Jebb)
515 Q 68 (Dr Hilda Mulrooney)
516 Q 68 (Kate Halliwell)
517 Written evidence from Nestlé (ZFP0051)
518 Q 70 (Kate Halliwell)
519 Q 72 (Kate Halliwell)
520 Q 70 (Kate Halliwell)

invest in support for business to reformulate effectively, was compelling. David Morris, the Deputy Head of Food, Agriculture, Fisheries and Rural Strategy in the Welsh Government, explained the support it offers to help industry meet its targets on reformulation:

> "We believe it is about providing the right support at the right time. To go back to our SME cohort, the largest part of the food manufacturing sector, a number of them—particularly the smaller SMEs and the micro businesses—do not have in-house resources for things such as reformulation. In our food centre network, under our Project Helix umbrella, we have a food centre in north Wales at Coleg Menai, in west Wales at Horeb and in south-east Wales at Cardiff Metropolitan. It is an outreach programme for all food manufacturers. It is heavily supported and costs them very little, if anything, and they have access to all the food technologists they need. They have the production facilities they need. They have tasting suites and access to virtual reality grocery retail experiences. There is a suite of support and programmes to aid their development. That makes concepts such as reformulation much easier for businesses."[521]

Creating a level playing field

385. Although the industry representatives did highlight some of the barriers they felt existed for industry to reformulate certain products, there was some support expressed for mandatory reformulation measures. Andrew Opie, Director of Food and Sustainability at the British Retail Consortium, stressed that the food market is very competitive, and suggested:

> "That bites on things such as reformulation at points where a retailer may go so far to reformulate a product, but eventually it may not have the quality or taste that a consumer might perceive to be what they want to buy. It is a competitive market, and not having some mandatory levels around things such as reformulation or labelling is a handicap and holds back further progress across the food industry."[522]

386. There was some agreement that regulation on content would represent a fair method of encouraging the industry to reformulate products to make them healthier without putting them at a competitive disadvantage. Andrew Opie went on to suggest that mandatory regulation:

> "sets a level playing field in many areas. With issues such as salt reduction, for example, it is a bit of a mystery why retailers have managed to remove so much salt and other manufacturers have not. I just put that as a question. That is a choice issue because it is a voluntary area."

> "There are other things that would underpin that. We need education for consumers so that they know when to make the right choices and build the right diet. That is a more complex thing than just choosing the right individual product. I am not sure that we see as much of that as we could."

> "Similarly, to help SMEs to participate in this, particularly in some of the food-to-go sector, there probably needs to be help from local authorities, which have responsibility for public health, so that some of those smaller

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521 Q 115 (David Morris)
522 Q 94 (Andrew Opie)

businesses can make changes that they probably could make without costing them business. There are lots of other areas that underpin it."[523]

387. We listened to the concerns from industry and we acknowledge calls for clear direction from the Government on the issue of reformulation. We were concerned, however, that the evidence we received from the retail and manufacturing industries did, at times, direct responsibility for reducing the availability and accessibility of less healthy food elsewhere, either to Government, local authorities, schools or to the consumer. During the oral evidence session with retailers, the Committee asked witnesses to respond to its concerns that blame for the population's poor dietary health is often shifted onto others by the food industry. Andrew Opie responded by stating that:

"The point we are making is that we are not here to blame anybody else. I am here to accept the responsibility for retail, but if we want to make a real difference, we have to see everybody in the food industry taking a more progressive approach to the issue".[524]

Mr Opie went on to state that:

"It will be a comprehensive answer if we really want to make a difference. I am certainly not here to say, "It's them, it's them, it's them". What I am here to say is, "This is what is possible". We have shown what is possible in labelling, reformulation, removal of trans fats and healthier promotions. All of those things are absolutely possible. We just need universal application of those and support from government."[525]

Portion sizes

388. Another area where it was argued that Government regulation could be effective in encouraging healthier choices was in mandating responsible portion sizes. Both Nestlé and Sainsbury's supported this as an approach. Judith Batchelar, Director of Sainsbury's Brand, told us:

"We have done all this work on reformulation but it hasn't really worked. If you think we have been reformulating products for 20 years, we still have a massive problem in terms of nutrition, health, wellbeing and at the extreme, obesity and that's because we have been unable to create an equivalence on portion size. If you look over the same period of time, portion size has grown and one of things we have been lobbying for ….is portion size guidance, which years ago we used to have."[526]

389. The Centre for Diet and Activity Research raised the issue of portion size and highlighted that: "An extensive body of research illustrates the contribution of increasing portion sizes to the prevalence of obesity and overweight."[527] City Harvest suggested that: "Portion sizing also has a huge impact on the average consumer leading to obesity and excess waste. Around 70% of all food waste happens in the home and most of this is down to portion size and date labels."[528]

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523 Q 94 (Andrew Opie)
524 *Ibid.*
525 Q 95 (Andrew Opie)
526 Q 94 (Judith Batchelar)
527 Written evidence from the Centre for Diet and Activity Research (ZFP0038)
528 Written evidence from City Harvest (ZFP0055)

390. Mark Laurie from the Nationwide Caterers Association highlighted that large portion sizes were an issue in the catering sector. He told us that

> "A lot of people buy based on size. I guess that size is relative to value in people's minds, especially if they do not have very much money. A massive portion of chips will probably seem like great value, whereas, in the nutrition they are getting from it, it is terrible value."

> "I had a chat with someone from the fish friers' association. I said, "Why do you guys always sell massive portions of chips?" Whenever we buy fish and chips, we get a massive portion that would feed a whole family. I said, "Why do you do it? No one eats them; they just throw them all in the bin. It is a waste of food and money". He said, "It is a race to give the biggest portions because that is what people want".[529]

391. The Government's sugar reduction programme states that businesses are able to take action to reduce the levels of sugar in their products through reformulation, reducing portion size or shifting consumers purchasing patterns towards lower/no added sugar products.[530] Similarly, the Government's calorie reduction programme states that industry has the option to reduce the portion size of its products to meet the Government's target to reduce calories.[531] The Government has not yet indicated that it will consider measure to mandate portion sizes in the published chapters of its childhood obesity plan or through any other current public health proposals.

392. ***As part of any future measures the Government sets out to tackle obesity and poor dietary health, it should develop and publish a consultation with industry on the issue of mandating maximum calories per portion. This consultation process must involve active engagement with SMEs and the catering sector.***

The case for reformulation: conclusions

393. It was suggested that reformulation has limits as an approach. Overall, witnesses were sceptical of the Government's apparent dependency on reformulation measures to deliver public health improvements.

394. There have, however, been signs that both voluntary and mandatory measures can deliver results. Consistently throughout the evidence, programmes that aim to encourage, or mandate, manufacturers to reformulate their products to make them healthier, were cited as an important component of the solution to deliver better health outcomes.

395. In her report, *Time to Solve Childhood Obesity*, Professor Dame Sally Davies called on the Government to: "Rebalance the food and drinks sold to favour healthy options, through regulation" and stated that:

> "Ministers are in a unique position of influence to shape the environment. They can set the scene for nudging positive outcomes or they can continue to allow the flow of unhealthy options to dominate a child's upbringing. Political apathy will mean that negative health

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529   Q 88 (Mark Laurie)

530   Public Health England, *Sugar Reduction: Report on progress between 2015 and 2018* (September 2019) p 12: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839756/Sugar_reduction_yr2_progress_report.pdf [accessed 30 June 2020]

531   Public Health England, *Plans to cut excess calories consumption unveiled* (6 March 2018): https://www.gov.uk/government/news/plans-to-cut-excess-calorie-consumption-unveiled [accessed 30 June 2020]

consequences for children continue—limiting their life chances whilst restricting economic productivity and the viability of the NHS."[532]

396. The success of the SDIL demonstrates that regulatory action on reformulation can deliver results, without impacting on economic viability in the sector. This is a clear indication to us that that the Government should do more to explore further mandatory and fiscal measures to compel the food industry to act. The Public Health Minister, Jo Churchill MP told us that:

> "I would like to see reformulation go on at pace. We have been incredibly clear that where progress isn't being made, we will consider what further action can be taken. I think that the SDIL lays down a very strong marker to the industry that the Government is willing to take regulatory action. We need to send a strong message that this isn't about reducing sales it is about reducing sugar and ultimately about helping people make healthier choices."[533]

397. **Reformulation is an important part of overall efforts to drive healthier diets. The Government must maintain the pressure on food manufacturers to reformulate their products. The Government must recognise that the fact that Government-led reformulation programmes are required at all, points to wider and more serious failings in the food system as a whole.**

398. **For voluntary programmes to be successful it is imperative that targets are transparently monitored and regularly reported on. Voluntary approaches may be successful if the Government sets out the right support to ensure industry stays engaged.**

399. *We recommend that all reformulation programmes, both voluntary and mandatory, should be subject to transparent and regular monitoring. Progress reports need to be carried out on a regular basis by the responsible body and should include details of the companies that have successfully made reductions in the levels of salt and sugar in their products, to aid industry-wide reformulation.*

400. *We recommend that where voluntary approaches are adopted, the Government should make clear that if the industry does not respond comprehensively and swiftly then regulatory action will follow. Both the sugar and salt reduction programmes are unlikely to meet their stated targets. To ensure that necessary and significant public health improvements are actually achieved, the Government needs to face the reality of the situation and start to plan now for how further progress on reformulation might be delivered. The Government should set out now what mandatory action would look like, if sufficient progress is not made on the existing reformation programmes in the near future. Industry can then prepare. We ask that the Government does this by the end of 2020.*

401. *Mandatory (fiscal) approaches can be highly successful, as evidenced by the Soft Drinks Industry Levy. As there is a proven mechanism*

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532 Professor Dame Sally Davies, *Time to Solve Childhood Obesity. An Independent Report by the Chief Medical Officer* (2019), p 2: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/837907/cmo-special-report-childhood-obesity-october-2019.pdf [accessed 30 June 2020]

533 Q 120 (Jo Churchill MP)

for delivering successful reductions in harmful ingredients, in a way which has not had a significant detrimental impact on the industry, the Government must not delay in exploring the application of fiscal measures (such as further levies or changes to VAT) to other product categories where reformulation is not in line with Government guidance or targets.

402. *We recommend that the Government stands by its commitment to review the Soft Drinks Industry Levy in 2020, and commits to extending the levy to other drinks containing added sugar, including sugary milk-based drinks. It should also conduct work to explore the impact of lowering the current sugar thresholds to encourage further reformulation. It should rapidly determine which other food products high in sugar could be subjected to a similar levy.*

CHAPTER 6: FOOD AND THE NATURAL ENVIRONMENT

403. We have concluded that a food system: "encompasses everything from production at the farm through manufacture, retail, use in the home and the waste that goes on along the way".[534] We were established to investigate the links between public health, inequality, and food sustainability. In previous chapters, we have outlined how these elements of the food system interrelate. Our report has so far focussed on how consumers experience food insecurity, the food environment and on the health impacts of UK diets. The Committee also received evidence relating to the primary production side of the food system, and the impact of agriculture on the environment. To achieve a healthy and truly sustainable food system, the Government must address some fundamental questions about what and how much the nation should be producing, and how it should be producing it.

404. Agriculture employs almost half a million people in the UK, 1.5% of the total workforce, and in 2016, generated £23 billion worth of produce with a net contribution to the UK's economy of £8 billion.[535] Around half of the food eaten in the UK is produced in the UK.[536] The UK's production to supply ratio—which measures the farm-gate value of raw food production (including for export) divided by the value of raw food for human consumption—is 75% for indigenous-type foods (that is, those food that can be produced in the UK) and 61% for all foods.[537] More than 60% of the UK's agricultural production comes from livestock, which in 2016 was worth £12.7 billion.[538]

405. Our evidence indicated that economic forces requiring farmers to produce food as cheaply as possible can act as an inhibitor to producing in an environmentally sustainable way, and that there was a resultant negative impact on various environmental measures. We were told that sustainability included three strands: environmental, economic and social sustainability, and may require a fundamental shift in consumption, which could also hold health benefits.

406. Witnesses highlighted changes that will be brought in with the Agriculture Bill's new Environmental Land Management Scheme, and the necessity of appropriately defining 'public goods' which would be rewarded with public money. Standardised and mandatory reporting of certain environmental metrics is crucial to allow this scheme to operate effectively, and the

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534 Q 78 (Professor Andrew Balmford)

535 Department for Environment, Food and Rural Affairs, *The future Farming and Environment Evidence Compendium* (February 2018): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683972/future-farming-environment-evidence.pdf [accessed 29 June 2020]

536 Department for Environment Food and Rural Affairs, *National Statistics: Food Statistics in your pocket 2017: Global and UK supply*, (9 October 2018): https://www.gov.uk/government/publications/food-statistics-pocketbook-2017/food-statistics-in-your-pocket-2017-global-and-uk-supply [accessed 29 June 2020]

537 Department for Environment Food and Rural Affairs, *National Statistics: Food Statistics in your pocket: Global and UK supply'*, (30 March 2020): https://www.gov.uk/government/publications/food-statistics-pocketbook/food-statistics-in-your-pocket-global-and-uk-supply#uk-food-production-to-supply-ratio-1988-to-2018 [accessed 29 June 2020]. Production to supply ratio is calculated as the farm-gate value of raw food production (including for export) divided by the value of raw food for human consumption.

538 Department for Environment, Food and Rural Affairs, *The future farming and environment Evidence compendium* (February 2018): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/683972/future-farming-environment-evidence.pdf [accessed 29 June 2020]

Government must ensure that payments are truly conditional on meeting the targets for progress.

407. Agricultural technology and innovation pose opportunities for more efficient farming, but only if appropriately supported by funding for Research and Development and a stable funding and policy environment, and they must not be allowed to damage biodiversity or animal welfare. We heard views on post-Brexit trade agreements and were convinced of the economic, environmental, and moral imperatives to ensure that imported food reaches the same environmental, health and animal welfare standards as food produced in the UK.

408. The UK's population does not consume enough fruit or vegetables. Low national consumption is due, in large part, to issues with the food environment and the complicated factors which shape consumer choice. Increasing consumption will therefore require a comprehensive action plan; this should sit within the National Food Strategy. We have called for actions that farmers take to enhance and improve public health to be supported and rewarded under the new Environmental Land Management Scheme. These measures could include those which work to increase consumption: local marketing; partnerships with procurers; educational schemes and the quality and variety of produce.

Impact of food production on the environment

409. Farmers are the custodians of the British countryside. Around 72% of the land in the UK is used for agriculture.[539] UK landscapes and understanding of those landscapes are shaped and maintained by farming activities. We do not diminish the importance of this role, nor ignore some of the excellent examples of good practice from farmers who take their role as countryside stewards extremely seriously. It is, however, clear that food production can have significant and negative effects on the environment.

410. The damage is wide-ranging (see Figure 9). Agriculture impacts negatively on a variety of different environmental measures. It accounts for 10% of the UK's greenhouse gas (GHG) emissions, contributes to water and nutrient pollution, soil degradation, huge usage of water and is: "the major driver of ecosystem damage."[540] Professor Andrew Balmford, Professor of Conservation Science at the University of Cambridge, summarised these impacts, stating that:

> "It is important to acknowledge that food production has the greatest set of impacts on the planet of any human activity by a long way, across the piece and across different types of impact. Agriculture uses up a lot of space. It uses up and redirects water. It emits greenhouse gases. It emits other pollutants. It results in the loss and degradation of soils. Beyond farming, in fisheries, it also causes direct mortality of creatures. That means that it has impacts on biodiversity, on climate, on soils, on flooding, on eutrophication, on the acidity of the oceans, on water availability and even on sea-level rise".[541]

539 Department for Environment, Food and Rural Affairs, *Agriculture in the United Kingdom* (2018) p 10: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741062/AUK-2017–18sep18.pdf [accessed 29 June 2020]
540 Q 2 (Professor Tim Lang)
541 Q 74 (Professor Andrew Balmford)

411. A report of the EAT-Lancet Commission found that: "Many environmental systems and processes are pushed beyond safe boundaries by food production."[542] Professor Tim Benton, Director of the Energy, Environment and Resources Programme at Chatham House, pointed to the economic impacts of food production on pollution and ill health. Professor Benton said: "Defra's own figures suggest that pollution costs from nitrogen and phosphate fertiliser are about £5 billion. The carbon cost of agriculture is about £2 billion at European carbon trading prices. I have not found a good estimate for how much food waste costs."[543]

412. Farming will inevitably have some impact upon the natural environment. It is possible, however, to significantly reduce these impacts. If the UK is to achieve a sustainable food system, or to meet the Government's target to become a Net Zero economy by 2050, it must do so.

413. One theme to emerge was that, currently, farming systems focus on producing food as cheaply as possible and that this places costs, or externalities, on the natural environment. It was suggested that these externalities were an inevitable outcome of a system which favours low cost food products over environmental sustainability. Producing food in sustainable ways can require investment, increase costs and possibly decrease yields. Alongside the difficulty in farming sustainably, and notwithstanding some instances of good practice, those who purchase food from farmers are keen to get the lowest price. A producer who spends their money and time on mitigating environmental impact may need to raise prices to cover their costs, thus losing competitive advantages.

414. It is clear that many farmers are themselves keen to ensure that they produce in a sustainable way, taking care of land and wildlife. We note, for example, the ambitious target set by the National Farmers' Union to achieve net zero GHG emissions by 2040, and the creation of the Nature Friendly Farming Network. Frustration was expressed at the difficult situation that producers find themselves in. The Sustainable Food Trust told us that farmers: "are trapped in an economic paradigm where they have little control of their method of production, since they understand that farming in an environmentally damaging way is the only way to make profit."[544] A former dairy farmer who submitted written evidence had found it extremely difficult to balance the costs of environmental protections and livestock welfare with the price paid by a leading retailer for his produce, and had ultimately felt "compelled to call time on the business".[545]

415. The true cost of food production includes the cost that is borne by the natural environment, which is not included in the price paid for the food by the purchaser. Philip Hambling, Head of Food and Farming Policy at the National Farmers' Union, told us that: "There is an area that has not been fully cracked as a challenge, which is trying to bring in externalities in the food system that are not necessarily covered by our traditional economic model."[546]

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542 Professor Walter Willet MD, et al, 'Food in the Anthropocene: the EAT-Lancet Commission on healthy diets from sustainable food systems', *The Lancet*, vol 393, (2019), pp 447–492: https://www.thelancet.com/journals/lancet/article/PIIS0140–6736(18)31788-4/fulltext
543 Q 82 (Professor Tim Benton)
544 Written evidence from the Sustainable Food Trust (ZFP0007)
545 Written evidence from Martin Lovegrove (ZFP0003)
546 Q 88 (Philip Hambling)

Figure 9: Percentages of UK pollution from ammonia and greenhouse gases derived from agriculture in 2017
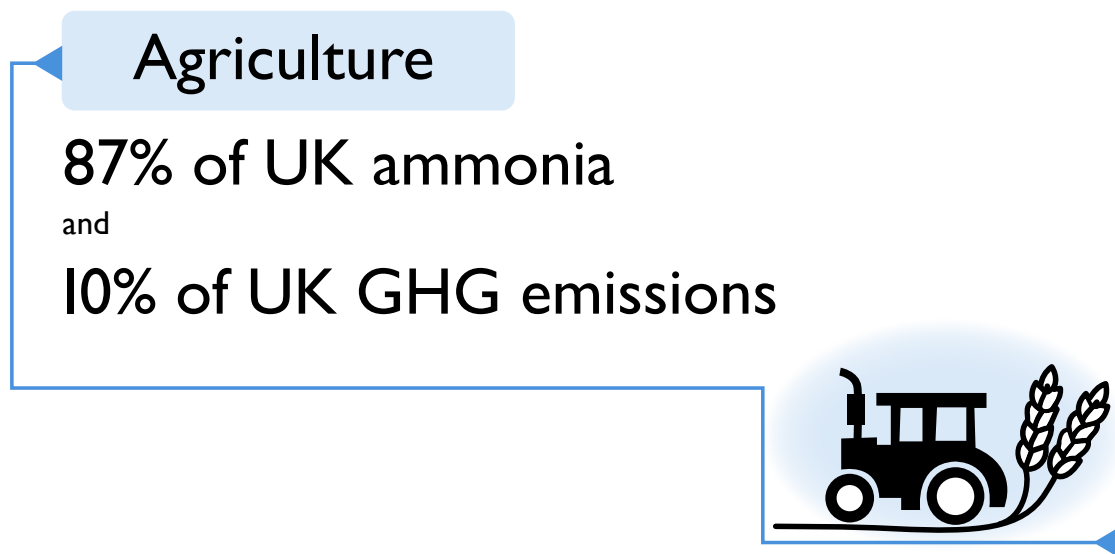
Agriculture

87% of UK ammonia
and
10% of UK GHG emissions

Source: Department for Environment, Food and Rural Affairs, The future farming and environment Evidence compendium (September 2019): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/834432/evidence-compendium-26sep19.pdf [accessed 29 June 2020]

What is a sustainable food system?

416. A key theme to emerge was that the term 'sustainable' is not as simple as 'environmentally friendly'. We were told that sustainable food systems would encompass three factors: environmental; social (covering nutrition and health); and economic (ensuring that agriculture provides a sustainable income for farmers). Philip Hambling from the National Farmers' Union referred to these elements as "the traditional three-legged stool of sustainability".[547]

417. If a food system (including both home-grown and imported food) is not providing for those considerations—for example if the food system is driving poor health outcomes or is not providing affordable healthy food—then it cannot be considered 'sustainable'. Sustainable systems must, therefore:

   •   Be socially positive. Enough healthy food, including whole grains, fruit and vegetables, would be available and accessible to all. Diet related ill health would fall. The NHS and wider society would benefit.

   •   Be economically viable. Farmers would be able to consistently and reliably sell produce at a fair price, enabling them to invest in processes and infrastructure to expand or improve their operations.

   •   Be environmentally sustainable. Land must be managed to ensure that it is used appropriately, continues to be viable for food production, and negative impacts on GHG emissions, water and air pollution and habitats and biodiversity must be substantially reduced whilst enhancing carbon sequestration and flood management.

It is crucial that the upcoming National Food Strategy considers all these factors in conjunction.

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547 Q 88 (Philip Hambling)

418. The evidence we received indicated that the way in which food is currently produced is environmentally unsustainable and that primary production is inflicting damage on the natural environment. Generally, 'environmental sustainability' means not compromising the environment for future generations. Many of our witnesses emphasised that it would be insufficient to maintain the *status quo*. Mr Percival for example, emphasised that change was absolutely necessary: "what we actually need is farming that puts value back into the system so that it replenishes our soils, brings wildlife back on to farms, brings more social value than it extracts and helps to resolve the climate and nature crisis and turn around the dietary ill health trends that we have seen."[548]

The Agriculture Bill

419. We were told that: "Farmers in some cases receive less than the costs of production making them dependent on other sources of income or Government subsidies"[549]; in 2016/17, around 20% of UK farms fitted this description.[550] Subsidies from Government (which were expected to be worth £2.7 billion in 2017/18)[551] predominantly come under direct payments from the EU's Common Agricultural Policy (CAP). A 2019 report from the National Audit Office found that these payments account for an average of 61% of farms' net profit and without direct payments, 42% of farms would have made a loss.[552] As many of these payments are based on acreage, they benefit larger holdings.

420. Following the exit of the UK from the EU, the CAP, the framework for most farming subsidies, will cease to apply. It will be replaced by provisions under the Agriculture Bill to draw up a new Environmental Land Management scheme (ELMS) which promises to reward public goods with public money. These public goods will include: "better air and water quality, higher animal welfare standards, improved access to the countryside or measures to reduce flooding."[553]

421. Alison Ismail, Acting Director for Agri-Food Chain Directorate, Department for Environment, Food and Rural Affairs, suggested that the replacement scheme will effect substantial change:

> "Environmental land management will offer the opportunity for farmers and land managers to produce different kinds of goods, including environmental public goods. For some of them that may mean moving away from more traditional agricultural activity and, indeed, may mean new entrants coming to the market seeking to provide not just, we hope,

548 Q 88 (Rob Percival)

549 Written evidence from Martin Yarnit (ZFP0002)

550 Department for Environment, Food and Rural Affairs, *Agriculture in the United Kingdom* (2018) p 10: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741062/AUK-2017–18sep18.pdf [accessed 29 June 2020]. This figure encompasses those farms which failed to make a positive Farm Business Income.

551 *Ibid.*

552 National Audit Office, *Early Review of the new farming programme* (5 June 2019) p 8: https://www.nao.org.uk/wp-content/uploads/2019/06/Early-review-of-the-new-farming-programme-Summary.pdf [accessed 29 June 2020]

553 Department for Environment, Food and Rural Affairs, 'Agriculture bill to boost environment and food production' (16 January 2020): https://www.gov.uk/government/news/agriculture-bill-to-boost-environment-and-food-production [accessed 29 June 2020]

a full range of environmental goods but potentially different types of agriculture and horticulture from what we have seen up until now."[554]

422. Many of our witnesses spoke about the potential of the Agriculture Bill to effect positive environmental change. Professor Balmford captured the view of much of our evidence when he described the Bill and the ELMS as: "very refreshing and exciting".[555] Although there is, as we discuss in paragraphs 446–455, a significant missed opportunity for the Bill to incentivise and support improvements to public health, the incorporation of environmental goods into the list of things for which farmers can be financially rewarded is certainly a positive step.

423. The Bill provides an historic opportunity to incentivise a host of public goods, but as Kath Dalmeny said: "Obviously, the detail still has to be worked out".[556] The Bill outlines high-level aims which 'could' be rewardable under the scheme, but provides very little detail of which measures would be rewardable, and how these will be determined. Professor Sir Charles Godfray, Director of the Oxford Martin School and the Oxford Martin programme on the Future of Food at Oxford University, pointed out that: "We have not decided what a public good is. Economists will take a technical definition of what a public good is, and many other people will take different definitions. We have to have a discussion about what that is."[557]

424. British Growers emphasised the current uncertainty, saying that it was unclear: "how a public good attracting public funding will be defined. It would be good to see more detail on the definition of a public good and get an indication of the amount of funding available to support this element of the future agricultural support system. Without adequate funding it could become little more than a catchy slogan."[558] The Government says that it is working with farmers to 'co-design' the system, but we are concerned that the full list of rewardable public goods, is not yet available. A consultation published in February 2020 on the scheme provided some indication of what is being considered, but it is clear that much integral information is still under consideration: the document sets out different tiers of payments but asks: "What could this tier pay for?"[559]

425. Our evidence was clear on the need to ensure that this scheme is planned appropriately because, as we have seen, there is a ripple effect of any change made to the food system. Professor Balmford was keen to emphasise that rewarding farmers for producing environmental goods would need to be tailored in some way and: "coupled with incentivising yield improvements and yield increases elsewhere within UK farmland".[560] Any effect of changes in production must be mitigated so that it does not decrease the availability of food. If, as Alison Ismail said, the ELMS might mean that farmers move away from traditional agricultural activity, there must be a plan to mitigate that.

554 Q 29 (Alison Ismail)
555 Q 78 (Professor Andrew Balmford)
556 Q 81 (Kath Dalmeny)
557 Q 87 (Professor Charles Godfray)
558 Written evidence from British Growers (ZFP0090)
559 Department for Environment, Food and Rural Affairs, *Environmental land management: policy discussion* (April 2020), p 20: https://consult.defra.gov.uk/elm/elmpolicyconsultation/supporting_documents/ELM%20Policy%20Discussion%20Document%2020230620.pdf [accessed 29 June 2020]
560 Q 78 (Professor Andrew Balmford)

426. ***We note that the Government's transition plan includes a commitment for largely unchanged funding for farmers until at least the end of the current Parliament. During this time, we urge the Government to undertake full and transparent consultation when considering the public goods that will be rewarded under the ELMS.***

The need for better metrics

427. If the ELMS is to reward producers for creating environmental goods, it must be abundantly clear what those public goods are, how to create them, and how to measure them. Without this clarity, confusion could arise about targets, farmers could miss out on their payments, (or these payments could be incorrectly paid), and ultimately, less will be achieved. Mr Percival from the Soil Association made the key point that targets must be realistic and practicable. He stated that: "You need to make sure that it is practical and achievable with no extra burden on farmers".[561]

428. Measuring the environmental effects of production methods can be extremely complicated. We were told, for example, that there were over 50 different models for measuring carbon, designed for different kinds of enterprises, and that there was "still quite a low degree of agreement on what constitutes soil health."[562] As it stands, the Agriculture Bill contains no frameworks to measure the environmental 'goods' it intends to reward. The Soil Association and the National Farmers' Union agreed that there must be standardised frameworks in place to measure progress towards public goods, particularly those identified as rewardable in the Agriculture Bill.[563] This is an eminently reasonable request and will allow the UK Government to circumnavigate a number of predictable pitfalls which would arise from a lack of standardisation. The Government told us that it will continue to use current evaluations alongside developing "other scheme indicators and evaluation frameworks that relate to our 25 Year Environment Plan, Net Zero and other policy ambition."[564] This work must be completed as soon as possible.

429. ***The Government must ensure that every public good outlined in the Agriculture Bill is accompanied by a standardised framework to allow measurements and targets to be clear, consistent and easy to use.***

Enforcement

430. It is encouraging that the Agriculture Bill includes provision to ensure adherence to some environmental standards through a system of conditional payments. The explanatory notes to the Agriculture Bill state that it includes: "the ability to establish an enforcement and inspection regime for the new financial assistance payments including powers to set out terms and conditions of future financial assistance."[565] It is vital that progress is robustly and consistently measured, and that this assessment has weight.

431. ***The Government must ensure that the ability to stipulate conditions for payments under the Environmental Land Management Scheme***

561 Q 92 (Rob Percival)
562 Q 92 (Philip Hambling)
563 Q 92 (Philip Hambling and Rob Percival)
564 Supplementary written evidence from HM Government (ZFP0098)
565 Explanatory Notes to the Agriculture Bill [Bill 112 (2019–21)-EN]

is both rigorously and fairly deployed. Where conditions are not met, enforcement action in the form of withholding payment must reliably follow.

The case for a dietary shift

432. Our report has already emphasised that, for reasons of public health, there is a need for a substantial dietary shift. There is another compelling case for dietary change—the types of food the population currently consumes are having an extremely detrimental effect on the planet.

433. It was made clear to us that, environmentally speaking, not all diets are equal. Certain food types have higher negative impacts upon the natural environment, particularly those arising from ruminant animals such as cattle and sheep. The dietary change that would deliver the most positive impact was, we were told, a reduction in meat consumption. Anna Taylor of the Food Foundation told us that meat consumption was "at the heart of the issue". She said that:

> "If we can reduce our consumption of animal products, it would provide a big lever for reducing the greenhouse gas emissions attached to our diet. It is important to highlight that we are not just talking about moving away from eating red meat to eating white meat, because we know that the white meat we eat is fed largely on soy, which in and of itself has a big land-use footprint."[566]

434. A variety of witnesses, including Dr Garnett[567], and the Soil Association[568] emphasised the environmental benefits of reducing meat consumption. Dr Morley told us:

> "We can be sure that there are certain principles that contribute to a sustainable diet, such as lower rates of red meat consumption than we currently have and higher levels of consumption of pulses, alternative forms of protein and vegetables. There is consensus around what a sustainable diet looks like."[569]

435. This evidence, calling for a decrease in meat consumption, is in line with calls from a variety of organisations. In January 2020 the Committee for Climate Change called for the consumption of beef, lamb and dairy, to be reduced by at least 20%.[570] Similarly, the EAT-Lancet Commission's 'Planetary Health Diet' favours smaller amounts of meat and dairy.[571]

436. Some evidence has indicated that a change in the nation's diets could deliver both health and environmental improvements. Academic research on the environmental implications of nationally recommended diets (which may involve a reduction in red meat and dairy) found that national adherence

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566 [Q 7](#) (Anna Taylor)

567 [Q 77](#) (Dr Tara Garnett)

568 Written evidence from the Soil Association ([ZFP0016](#))

569 [Q 76](#) (Dr Adrian Morley)

570 Committee on climate Change, 'Land use: Policies for a Net Zero UK' (January 2020), p 9: https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/ [accessed 29 June 2020]

571 Eat Forum, *The Planetary Health Diet and You*: https://eatforum.org/eat-lancet-commission/the-planetary-health-diet-and-you/ [accessed 30 June 2020]

could reduce food related GHG emissions by up to 17%.[572] Professor Balmford referred to a comprehensive study of different health and environmental impacts which found that: "foods that were good for the environment tended to be good for people as well."[573] Dr Garnett agreed that there was a correlation between healthy and environmentally sustainable diets but emphasised the need for careful planning to ensure that both outcomes were achieved. She described the double benefit of a dietary change as "possible but not inevitable. It is an arranged marriage rather than a love match."[574]

437. We agree with Dr Garnett's view on careful planning. A reduction in meat consumption could have significant environmental and nutritional implications, which must be considered carefully. Issues include:

- Residence times of GHGs in the atmosphere;

- Land use and carbon storage;

- The relative environmental and health impacts of different kinds of meat;

- The nutritional value of meat and dairy;

- Available alternatives (including the development of new artificially designed proteins)[575] and their cost and consumer acceptability; and

- The environmental implications of producing alternatives to meat and dairy.

438. Henry Dimbleby warned us that: "it is almost impossible to act on [the food system] in any way without creating winners and losers".[576] This is undoubtedly true but in no way represents an argument for inaction. It appears clear that a move towards a more plant-based, balanced diet, is becoming an increasingly pressing environmental imperative. In order to achieve this, the Government must carefully work through the health, social and environmental implications (including for biodiversity) of a move towards a more plant-based, balanced diet which balances environmental and health considerations.

439. **In order to protect the natural environment and public health, there is a need for a fundamental shift in national consumption patterns towards a more plant-based, balanced diet in line with the recommendations of the Government's Eatwell Guide.**

440. *The Government's White Paper on the National Food Strategy must include a definitive outline of what constitutes a sustainable diet with regards to health, social and environmental impacts. It must*

572 Paul Berhens, Jessica C. Kiefte-de Jong *et al*, 'Evaluating the environmental impacts of dietary recommendations', *Proceedings of the National Academy of Sciences of the United States of America*, vol 114 no 51, (December 2017), pp 13412–13417: https://www.pnas.org/content/114/51/13412. See also: Carbon Brief, *UK could cut food emissions by 17% by sticking to a healthy diet*, (December 2017): https://www.carbonbrief.org/uk-could-cut-food-emissions-17-per-cent-by-sticking-to-healthy-diet [accessed 30 June 2020]

573 Q 77 (Professor Andrew Balmford)

574 Q 77 (Dr Tara Garnett)

575 RethinkX, *Rethinking Food and Agriculture 2020–2030*, (September 2019): https://static1.squarespace.com/static/585c3439be65942f022bbf9b/t/5d7fe0e83d119516bfc0017e/1568661791363/RethinkX+Food+and+Agriculture+Report.pdf [accessed 30 June 2020]

576 Q 100 (Henry Dimbleby)

> *be accompanied with a graded action plan and communications strategy to move towards this diet.*

Food production and public health

441. A key question for our inquiry was how actors at every level of the food system can be empowered to help make healthier diets more accessible to all. It is clear that a major goal should be increasing the consumption of fruit and vegetables across all sectors of society. Figures from the 2018 National Diet and Nutrition survey indicated that: "only 31% of adults … and 8% of teenagers meet the 5 A Day recommendation for fruit and vegetables."[577] This rate falls among those in lower-income brackets[578], so a deficiency in fruit and vegetable consumption is not only a crucial weakness in the nation's diets, but a factor in health inequalities.

442. There were strong calls in our evidence for a strategy or an action plan to increase production and consumption of fruit and vegetables in the UK. Anna Taylor for example, when asked for her key policy suggestion, argued for a: "comprehensive strategy for driving up fruit and veg consumption right the way from production, the horticultural end, to consumption and advertising."[579] Suggested interventions work either to increase what we have viewed as 'the demand side', or to address problems on 'the supply side'. Many of our witnesses were keen to argue that the food system is to a large extent, driven by demand. Dr Adrian Morley argued for example that necessary consumption shifts: "will be achieved only by shifting consumer demand".[580]

443. Both the 2010 report of the Fruit and Vegetables Task Force[581] and a 2020 report by the Food Foundation[582] identified that reform of public messaging programmes, better practise in marketing, changes to the Healthy Start scheme, and support for education schemes would increase consumption of fruit and vegetables. These suggestions tally with what we have learnt about the food environment, outlined in Chapter 4 of this report.

444. We are hopeful that, with appropriate governance and sufficient commitment (issues we address in Chapter 7), the National Food Strategy can take the proposals for increasing fruit and vegetable consumption forward and develop them into concrete actions. There should be a dedicated section in the review addressing this topic.

445. *The National Food Strategy should outline a comprehensive action plan to increase the demand for and consumption of fruit and vegetables.*

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577 Public Health England, *PHE publishes latest data on nation's diet*, (16 March 2018): https://www.gov.uk/government/news/phe-publishes-latest-data-on-nations-diet [accessed 29 June 2020]

578 The Food Foundation, *Food system challenges*: https://foodfoundation.org.uk/food-system-challenges/ [accessed 29 June 2020]

579 Q 8 (Anna Taylor)

580 Q 76 (Dr Adrian Morley)

581 Fruit and Vegetables Task Force, *Report of the Fruit and Vegetables Task Force* (August 2010): http://www.appg-agscience.org.uk/linkedfiles/Fruit%26VegTaskForceReport.pdf [accessed 29 June 2020]

582 The Food Foundation, *Veg Facts 2020 In Brief* (10 June 2020), p 10: https://foodfoundation.org.uk/wp-content/uploads/2020/06/Pease-Please-Veg-Facts-2020-In-Brief-spreads-1.pdf [accessed 29 June 2020]

Financial support for horticulture

446. At the moment, only 1.9% of UK land is used to produce fruit and vegetables.[583] The Government told us that in 2018, 53% of marketed vegetables were produced in England and that the figure for home-produced fruit was at 16.7%.[584] Shirley Cramer referred to one report which found that if all suitable land in England was used to grow fruit and vegetables we "could by 2030 have 18,000 fewer deaths from cardiovascular disease."[585]

447. Several witnesses suggested that horticulturists should benefit from a specific subsidy to be incorporated within the Agriculture Bill. The idea is that by providing additional funding to fruit and vegetables, farmers could increase the supply, and this would feed through the supply chain and increase consumption. Nourish Scotland stated that there is: "huge potential for much more high quality, nutritious food to be grown by smaller scale farmers—currently excluded from any advice or assistance due to being below the minimum land requirement for the Basic Payment Scheme."[586] Kath Dalmeny proposed a national programme for "subsidising fruit and vegetable production, or at least supporting more land for that kind of use and perhaps more entrants to small-scale horticulture, diverse crops and all those kinds of things" and stated that this would: "give ingredients to a food industry that would then make good use of subsidised ingredients that bear health in them."[587] Philip Hambling of the NFU told us that: "there is certainly an opportunity for UK agriculture and horticulture to be part of a solution to deliver healthy fruit and veg for the nation."[588]

448. We note that, historically, subsidy schemes have excluded horticulturists—aside from the legacy Fruit and Vegetable Aid Scheme, they have largely been left to stand on their own financial feet. On average, in 2018/19, horticulture farms received just over 1% of their income from subsidies, compared to 11% for all farm types.[589]

449. Some contributors felt that the Agriculture Bill presented an opportunity to rectify this shortfall and reward famers for measures that would improve public health. Sustain, for example, has proposed that measures which "increase the availability, affordability, diversity, quality and marketing of fruit and vegetables and pulses"[590] could be rewardable under the ELMS proposed by the Bill.

583 Q 63 (Shirley Cramer)

584 Written evidence from HM Government (ZFP0079)

585 Q 63 (Shirley Cramer). Ms Cramer was referring to Paraskevi Seferidi, Anthony a Laverty, Brendan Collins *et al*, 'Potential impacts of post-Brexit agricultural policy on fruit and vegetable intake and cardiovascular disease in England: a modelling study', *BMJ Nutrition, Prevention & Health* (2019): https://nutrition.bmj.com/content/early/2020/01/14/bmjnph-2019–000057 [accessed 30 June 2020]

586 Written evidence from Nourish Scotland (ZFP0064)

587 Q 86 (Kath Dalmeny)

588 Q 89 (Philip Hambling)

589 Department for Environment, *Food and Rural Affairs, Farm accounts in England—Dataset* (December 2019): https://www.gov.uk/government/statistics/farm-accounts-in-england. Based on analysis of tables 5.17 and 5.23. [accessed 29 June 2020]

590 Sustain, 'Public Health and Agriculture Policy: Why we need a new clause linking public health and farming' (October 2018) p 1: https://www.sustainweb.org/resources/files/other_docs/Public%20 health%20amendment%20briefing%20on%20Agriculture%20Bill.docx [accessed 29 June 2020]

450. This could be interpreted to mean area-based or blanket subsidies to incentivise increased growth of fruit and vegetables. There are, however, some limitations to this simple subsidy approach:

- The quantity of fruit and vegetables grown in the UK is not necessarily the limiting factor in consumption. Given the many barriers we identified to a healthy diet in Chapter Four, we believe that subsidising production would be unlikely to solve many of the accessibility problems that prevent people from eating the recommended quantities of fruit and vegetables. Henry Dimbleby felt that subsidising producers was likely to be ineffective:

  "If you look at the total environmental subsidy of £3.4 billion, that is £50 per household, but if you put all your subsidies into veg I do not think you are going to get people eating more veg. I do not think that is going to do it. There might be areas where you can encourage it and that you could link, but I do not think putting it in at the production end is going to work."[591]

- Another argument against directly subsidising the production of fruit and vegetables in the UK is that the use of natural capital to increase food production in the UK might backfire by driving further environmental degradation and: "make things worse generation by generation".[592] Growing non-indigenous fruit (aside from apples, the most popular fruits—bananas, oranges and grapes—are not generally grown in the UK), is more resource intensive. Analysis from the Food and Climate Research Network found that much overseas grown produce transported by sea was fairly low in greenhouse gas intensity. It argued that growing all fruit and vegetables in the UK "is unlikely to be 'the' optimal answer since there are trade offs between import-related transport and mobile cold storage emissions on the one hand and waste and stationary cold storage emissions through the storage of indigenous food on the other."[593]

- There are concerns around the availability of labour to harvest these plants. Given the reported shortage of farm labourers in the weeks and months following the outbreak of COVID-19,[594] and the impending exit from the European Union, it is possible that subsidies which do not address labour shortfalls are likely to be ineffective.

- There is some opposition in the agricultural industry towards fruit and vegetable subsidies. British Growers told us that they would prefer action by supermarkets and consumers and that: "the fresh produce industry would prefer to operate without subsidies which it believes can have a distorting effect".[595]

451. The Government's written evidence told us that the Agriculture Bill could provide support to help growers increase the productivity of fruit and vegetable

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591 Q 104 (Henry Dimbleby)
592 Q 86 (Professor Tim Benton)
593 Tara Garnett, Centre for Environmental Strategy, University of Surrey, Food and Climate Research Network, *Fruit and vegetables and UK Greenhouse Gas emissions: exploring the relationship* (22 September 2006) p 7: https://fcrn.org.uk/sites/default/files/fruitveg_paper_final_0.pdf [accessed 29 June 2020]
594 'Coronavirus: Furloughed staff replace overseas farm workers', *BBC News* (15 April 2020): https://www.bbc.co.uk/news/uk-england-hereford-worcester-52294856 [accessed 29 June 2020]
595 Written evidence from British Growers (ZFP0090)

production.[596] If properly managed to ensure that they do not cause further damage to land, animal welfare or biodiversity, increases in productivity are welcome.[597] Consideration of the issues outlined here suggests however, that a simple subsidy for horticulturists (whether a blanket subsidy or one based on acreage) may be an ineffective mechanism to increase the consumption of fruit and vegetables.

452. There is flexibility in the Agriculture Bill as to how farmers could be supported[598], and if the Bill were to enable rewards for some measures to improve public health, farmers could be incentivised, enabled and supported to increase demand for fruit and vegetables. These measures could include but are not limited to:

- Facilitating educational visits (including visits to and from schools);

- Measures to increase the quality and diversity of fruit and vegetables;

- Measures to promote fruit and vegetables. This could take the form of general marketing, or running events in partnership with local organisations or local authorities; and

- The formation of partnerships with procurers. In this area, Government support in changing wider procurement frameworks and guidelines are likely to be most effective, but other forms of facilitation, such as guarantees or loans, could play an important role.

453. In the list of activities eligible for financial assistance, the Agriculture Bill includes "supporting ancillary activities carried on, or to be carried on, by or for a producer"[599] and the explanatory notes state that this could include financial assistance for support to selling or marketing activities. Given the potential for horticulturists in particular to improve public health, we recommend that agricultural policy in general recognises and rewards this. Specifically, the Agriculture Bill should identify public health as a financially rewardable 'Public Good' and the measures we have listed above as activities eligible for financial assistance.

454. Rewarding and supporting farmers in increasing demand for fruit and vegetables could increase consumption. Simple economics would suggest that increasing demand will eventually increase supply; if there is a market for produce, farmers will grow it.

455. ***We recommend that Government should list Public Health as a 'Public Good' under Clause One of the Agriculture Bill. Measures eligible for financial assistance to improve public health should be focussed on (but not necessarily limited to) those activities which increase demand for fruits and vegetables.***

Resilience and continuity of supply

456. Throughout our inquiry, we considered whether it was desirable to produce more food in the UK. The Government told us that, in 2018, the UK had 53% of home-produced marketed vegetables and 16.7% of home-produced

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596   Supplementary written evidence from HM Government (ZFP0098)

597   See paragraphs 484–488.

598   Agriculture Bill, Clause 2 [Bill 112 (2019–21)]. The bill allows for farmers to be supported by way of "grants, loan, guarantee or in any other form".

599   Agriculture Bill, Clause 1

marketed fruit.[600] A model where more of the UK's food was produced 'in-house' could support smaller producers, enhance animal welfare standards, reduce air-miles and increase resilience to global shocks that disrupt food supply. In addition, Henry Dimbleby's consultation found that there was a strong emotional desire for localised production: "The one thing that everyone seems to share is the idea that they want their food to be nearby … There is a very strong sense of us as a food-growing nation".[601]

457. Of the utilised agricultural area in England, only around 0.3% is used for growing fruit crops[602], which might suggest the potential for using more land for growing important crops. The Government has acknowledged this: "There is potential that the UK could increase its home-produced marketed share and it is likely that the industry would be keen to do this".[603] There was some suggestion that producing more 'in-house' could increase the consistency of national supply. Professor Benton stated: "Under a resilient food system, there is a much more natural argument to have a discussion about how much we produce at home versus relying on importing."[604]

458. Another point that was raised by Henry Dimbleby was that trading is crucial for ensuring resilience in the food system "because it protects us from bad harvests".[605] The Government also argued that many products cannot be produced in the UK, and that supply would fail to meet demand for year-round access to certain foods.[606]

459. The empty shelves in supermarkets and the unpicked food in fields following the outbreak of COVID-19 demonstrate that there are certainly discussions to be had about the resilience of the food supply. A House of Lords Select Committee recently urged the Government to develop a comprehensive food security policy for the UK.[607] We are inclined to support this recommendation and are hopeful that the upcoming National Food Strategy will address this important piece of work.

Trade

460. Following Britain's exit from the European Union, the Government's decisions about trade policy with regard to food have the potential to enhance food security through a strong and resilient agricultural sector. Trade in this sector could deliver a healthier diet, continue the UK's strong record on high animal welfare standards, encourage sustainable practices elsewhere, and support the broader agri-environment.

461. Trade featured in many of our discussions and much of our evidence. There was strong agreement that, whatever environmental standards are implemented following Brexit, trade arrangements must support these

600 Written evidence from HM Government (ZFP0079)

601 Q 101 (Henry Dimbleby)

602 Department for Environment, Food & Rural Affairs, *Farming Statistics: Land Use, Livestock Populations and Agricultural workforce at 1 June 2019 : England* (October 2019) p 5: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/868945/structure-jun19-eng-28feb20.pdf [accessed 29 June 2020]. Small fruit and orchards account for 32,000 hectares , 0.35% of the total utilised agricultural area (9 million hectares).

603 Written evidence from HM Government (ZFP0079)

604 Q 80 (Professor Tim Benton)

605 Q 101 (Henry Dimbleby)

606 Written evidence from HM Government (ZFP0079)

607 European Union Committee, *Brexit: food prices and availability* (14th Report, Session 2017–19, HL Paper 129)

standards rather than undermine them. Several of our witnesses spoke of the need to apply the same environmental standards to imports as are applied to food produced in the UK. This is partly a competitive requirement for British farmers who may otherwise be undercut by cheaper food produced with lower environmental standards, and partly a moral imperative not to encourage poorer standards elsewhere. Dr Garnett said: "We cannot export or import the problem".[608] Evidence from British Growers emphasised that: "The UK needs to guard against 'off shoring' production in the interests of keeping prices low but without proper concern for the impact on the environment in those countries exporting produce to the UK."[609]

462.   If trade agreements allow for the import of cheap food, produced according to lower environmental standards, this would put UK producers at a competitive disadvantage; they would be internalising the costs of food production to the environment, while the producers of the imports would not be doing so. Nothing in the Agriculture Bill as it stands would prohibit this. Professor Benton argued that this would: "undercut the profit margins of our farmers", potentially leading to the loss of many smaller or less intensively producing farmers.[610] The Nature Friendly Farming Network agreed. It emphasised that: "The risks posed by a model that allows environmentally sensitive farmers in the UK to be 'undercut' by cheap, damaging imports are numerous and could see the loss of many of our most environmentally beneficial farmers."[611] Another possible scenario is one where UK farmers are compelled to lower their production standards on sustainable farming, safety, and animal welfare in order to remain competitive.

463.   There was also serious concern that access to cheaper food (which may be produced with lower environmental protection or animal welfare standards) would: "undercut our ability to do everything else we want to do in this space".[612] If we are, as a nation to aim to encourage sustainable production, then it stands to reason that we ought to ascribe: "the same values that we ascribe to production in the UK through trade and procurement policy."[613] The very least the Government can do to protect British producers and the natural environment is to import food products following the same standards as applied in the UK. The Food Ethics Council has estimated that since: "70% of the UK's environmental food footprint is based overseas",[614] there is an obligation to support sustainable growing and production in other countries. This could be achieved by requiring the same levels of environmental integrity from imported products as those produced in the UK.

464.   There could also be health implications in importing food made to different health and safety specifications. When asked whether retailers would rule out importing food made to lower safety standards, Mr Opie from the British Retail Consortium and Ms Batchelar from Sainsbury's focussed on consumer acceptability, stating that they did not anticipate consumers lowering their standards. We are, however, concerned that if food produced to lower health and safety standards can be imported cheaply, some retailers

608   Q 76 (Dr Tara Garnett)
609   Written evidence from British Growers (ZFP0090)
610   Q 80 (Professor Tim Benton)
611   Written evidence from the Nature Friendly Farming Network (ZFP0089)
612   Q 87 (Professor Tim Benton)
613   Q 90 (Philip Hambling)
614   Written Evidence from the Food Ethics Council (ZFP0054)

will sell it. Not all consumers would necessarily buy food produced to lower health standards, but if it were available more cheaply, the most vulnerable in society may not be able to avoid it.

465. We understood that the requirements to import only food that meets current UK standards on environmental, health, and animal welfare standards will be difficult to achieve. One difficulty arises when we consider the differing priorities of Government Departments. We were told by Henry Dimbleby that: "DEFRA and Trade have very different objectives in our trade negotiations with other countries. There is a constant running battle between BEIS and Health on proper regulation of retailers and food producers."[615] We recognise the difficulties inherent in this, but it is crucial that the Government obtain the right trade deals for the future.

466. In a joint letter to MPs and Peers, dated June 5 2020, the Secretary of State for International Trade, the Rt. Hon. Elizabeth Truss MP, and Secretary of State for the Department for Environment, Food and Rural Affairs, the Rt. Hon. George Eustice MP, stated that in all of its trade negotiations, the Government "will not compromise on our high environmental protection, animal welfare and food standards."[616] The same phrase was used in the Government's evidence to our inquiry which added: "We are committed to supporting global decarbonisation and we are clear that trade will not come at the expense of the environment."[617] It is unclear at the time of writing how the Government intends to honour these commitments.

467. When asked in a House of Lords debate about trade deals which could allow imports farmed to less rigorous standards, Lord Agnew of Oulton, the Minister of State at the Cabinet Office and Treasury stated that: "there has to be a balance between keeping food affordable… to ensure that they are able to eat healthily, while not undermining in any way the quality of the food we eat."[618] This statement falls far short of the commitment we were told was necessary: to refuse to export the problem.

468. An amendment to the Agriculture Bill which aimed to ensure that future imports adhered to the same standards of environmental and animal welfare protection as is mandated in the UK was defeated in the House of Commons on 15 May 2020.[619]

469. ***Food imports must be required to adhere to the same health, environmental and animal welfare standards as food produced in the UK. To fail to do so would make a mockery of our stated environmental values, and irrevocably undermine British producers. The Government must set out how it intends to ensure that current standards are maintained in future trade agreements, and what safeguards will be in place to guarantee this.***

615   Q 100 (Henry Dimbleby)
616   Letter to MPs and Peers from the Rt. Hon. Elizabeth Truss MP, and Secretary of State for the Department for Environment, Food and Rural Affairs, the Rt. Hon. George Eustice MP, 5 June 2020. Letter referred to by Lord Gardiner of Kimble, Parliamentary Under-Secretary of State, Department for Environment, Food and Rural Affairs, HL Deb, 10 June 2020, cols 1753-1754.
617   Supplementary written evidence from HM Government (ZFP0098)
618   HL Deb, 6 May 2020, col 518
619   HC Deb, 13 May 2020, cols 276–339

Production efficiencies

470. We were also told that farming practices could be made substantially more productive and efficient, and that farming that uses fewer resources or less land to produce the same or higher yield could be more environmentally sustainable. Professor Balmford explained this to us in terms of land use: "Any systems that are relatively low yielding tend to have disproportionate impacts. In order to produce the same amount of food, you need a larger area, so the [negative] impacts tend to be greater."[620] The aim is to increase efficiency, which Dr Garnett described as: "producing more with less, more with the same amount or more with only a little bit more."[621] A more efficient system could have a reduced environmental impact and could potentially free up resources to be used in the production or preservation of environmental goods.

471. We were warned that, while production efficiencies can be positive, other needs must also be considered to ensure that this does not lead to negative consequences. Dr Garnett said: "If we are producing more food that is making more people fatter and sicker, that is not necessarily a result."[622] Henry Dimbleby raised the example of a low-carbon cattle farm: "The most carbon-efficient systems are the feedlots of the United States. By feeding a cow hormones and keeping its life as short as possible by growing it quickly, you reduce the methane emissions, but that obviously has implications for animal welfare and health."[623]

472. Ideally, farming ought to be as efficient as is possible without undermining environmental or animal welfare considerations. We were told that technology holds some potential for enabling this shift. Witnesses also, however, identified a number of barriers to the development of the technology which could increase production efficiency without damaging the environment. These included that:

- There has been, effectively, a "brake" on R&D investment in agriculture over the past 20–30 years, causing a "plateauing of yields in some areas";

- There has been considerable investment uncertainty in the last few years; and

- There is limited clarity on the 'vision' for sustainable agriculture

Research and Development

473. Some evidence discussed the potential of research and development (R&D) in enabling production efficiencies.[624] The Government recognised that technological advances in AI, data and robotics were key to: "unlock the potential of farming by improving productivity … we can also use our resources more sustainably and reduce environmental impact."[625] There has been some investment in agricultural technology towards this aim. The

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620 Q 74 (Professor Andrew Balmford)
621 Q 75 (Dr Tara Garnett)
622 *Ibid.*
623 Q 100 (Henry Dimbleby)
624 Written evidence from the Crop Protection Association (ZFP0021), UK Research and Innovation (ZFP0039) and the Food and Drink Federation (ZFP0009)
625 Written evidence from HM Government (ZFP0079)

2013 Agri-Tech Strategy dedicated £160 million to support R&D[626] and the Industrial Strategy Clean Growth challenge supported programmes to stimulate the use of low carbon technologies. This includes the £90 million 'transforming food production' challenge fund (operated through UK Research and Innovation) which largely focusses on precision agriculture.[627] Countryside Productivity Grants provide funding for projects focussed on improvements to farming productivity. [628]

474. There was some suggestion that there had been a brake on R&D investment. Professor Balmford told us that: "technologists would tell us that there has been a brake on R&D investment in agriculture over the past 20 or 30 years, which is playing through into a plateauing of yields in some areas."[629] This was not widely echoed within the evidence we received, and there are several avenues of funding available. The inclusion of a technological 'good' in the Agriculture Bill is also a positive step. Funding must, however, be reliable and predictable in order to drive progress.

475. One concern that was raised within the evidence around investment in R&D was that for too long it has been inconsistent and unpredictable. One example of Government inconsistency in funding was the coalition Government's 2015 Food Enterprise Zone Scheme. This scheme provided grants to: "unleash the entrepreneurial spirit of the countryside and food producers"[630] but according to Martin Yarnit, a Churchill fellow, the funding was limited and, eventually, "quietly parked".[631]

476. Progress in the development of impactful technologies can be slow and sometimes expensive. In order to make meaningful strides, funding needs to be predictable: it must not be introduced and then withdrawn. This applies on a large scale, in research and development to produce technologies, and on a smaller scale, on individual farms using technologies and infrastructure.

477. New ways of producing food such as vertical farming[632] and the development of meat-free proteins have great potential to fundamentally change the way food is produced: support and funding for research and development must not exclude these non-traditional forms of food production.

478. ***The Government must provide sufficient and stable funding for research and development into agricultural technology and new ways of farming if sought after progress in increasing farming efficiency is to be made.***

479. We were told that uncertainty and inconsistency in Government budgets prevented producers from making their own investments. Farmers, who may

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626 Department for Business, *Innovation & Skills, £160 million technology boost for UK agricultural industries* (22 July 2013): https://www.gov.uk/government/news/160-million-technology-boost-for-uk-agricultural-industries [accessed 29 June 2020]

627 UK Research and Innovation, *Transforming food production*: https://www.ukri.org/innovation/industrial-strategy-challenge-fund/transforming-food-production/ [accessed 29 June 2020]

628 Department for Environment, Food & Rural Affairs, *Countryside Productivity Scheme* (27 March 2020): https://www.gov.uk/guidance/countryside-productivity-scheme [accessed 29 June 2020]

629 Q 75 (Professor Andrew Balmford)

630 Department for Environment, Food and Rural Affairs, *Food Enterprise Zones created to drive growth*, (12 February 2015): https://www.gov.uk/government/news/food-enterprise-zones-created-to-drive-growth [accessed 30 June 2020]

631 Written evidence from Martin Yarnit (ZFP0002)

632 Vertical farming is the practice of growing crops in vertically stacked layers and often incorporates controlled-environment agriculture.

consider investing in physical infrastructure or better farm operations may be reluctant to do so without knowing the direction of travel or what the budgets might be in the next decade. Philip Hambling from the NFU stated that: "multiannual budgeting is really welcome for long-term investments. Nothing in agriculture happens in a short space of time. That consistency is key."[633] Mr Percival from the Soil Association agreed, arguing that the Government must: "provide the long-term reassurance that farmers need to invest in strategic changes. We need multiannual budgets and clarity about the long-term direction of travel in policy."[634]

480. We were pleased that the Government intends to: "support farmers to invest in equipment, technology and infrastructure to help to improve their productivity, as well as deliver environmental benefits."[635] A key part of this support must be a stable policy environment where funding and investment from Government is predictable; uncertainty and inconsistent funding is chilling to the long-term planning and innovation we were told is crucial to increasing productivity and protecting the natural environment.

481. The Agriculture Bill will require the publication of multi annual financial assistance plans and require the Secretary of State to have regard to the priorities therein when determining financial assistance budgets or schemes.[636] This is necessary, but not enough. The Nature Friendly Farming Network emphasised the need for "Greater certainty about long-term funding under the Bill. We welcome additions to the Bill that require Ministers to establish a multi-annual financial assistance plan, but we would like to see these plans strengthened."[637] As it stands, the publication of financial assistance plans only requires an outline of strategic priorities and "such detail as the Secretary of State considers appropriate".[638] This is, we suggest, inadequate, and adds to our concern that the Bill may not offer sufficient guarantee of the information or the long-term surety that farmers will require to make investment decisions.

482. **The policy environment for farming has often been insufficiently stable to enable individual farmers to make investment decisions on improving efficiency or on the use of agricultural technology.**

483. *The Government must ensure that the multi-annual financial assistance plans to be published under the Agriculture Bill are stable and not subject to substantive change: providing a sufficient amount of detail to allow farmers to make investment decisions.*

Agroecology

484. Whilst agricultural technologies and investment in research and development present great potential for efficiencies, Government must be clear that any increase in productivity must not compromise biodiversity, animal welfare, human health, or the ability of land to continue producing food for the future. Dr Garnett told us that:

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633 Q 89 (Philip Hambling)
634 Q 89 (Rob Percival)
635 Written evidence from HM Government (ZFP0079)
636 Agriculture Bill, Clause 4
637 Written evidence from the Nature Friendly Farming Network (ZFP0089)
638 Agriculture Bill, Clause 4

"In itself, it is not a bad goal, but efficiency is a ratio and therefore has no boundary. We live in a world with limits—environmental limits of many kinds—so we have to think about these technologies partly in the context of limits and partly in the context of what our end goals are."[639]

485. We were told that investment in research and development and new technologies must include consideration of the possibilities of agroecology, which incorporates ecological considerations into agriculture. Increases in productivity must not come at the cost of environmental damage. There was some debate for instance, around conserving (or in some cases, re-introducing) wildlife in the natural environment. The majority of our witnesses argued that a model which enabled existing farms to enhance nature on their land by, for example, introducing ponds and planting hedges at boundaries, would be a positive first step. This could have the double benefit of reducing the net emissions of carbon dioxide. A January 2020 report by the Committee on Climate Change stated that an increase in tree planting by at least 17% was necessary if the UK was to achieve the target set to produce net zero emissions by 2050.[640]

486. A different approach would be to intensively farm some pieces of land and leave some land unfarmed to allow the development of wildlife and habitats. Professor Balmford suggested concentrating food production in particular areas: "Then in other parts, perhaps within the same landscape, we could have large-scale areas set aside for the ecosystem services that we rely on for nature."[641].

487. It was not for us to determine between this approach and the land 'sharing' approach outlined in paragraph 485. It is only one example of where the 'end goal' must be carefully considered. We are clear that there is a balance to be struck, where new agricultural technology can allow for a more productive and efficient use of land, without undermining the natural environment or biodiversity.

488. ***Any investment in or policy change related to farming productivity, including investment in agricultural technology or land use must take account of the imperatives to avoid undermining the ability to produce food in the future, and to protect biodiversity and animal welfare.***

Food industry reporting

489. There is huge untapped potential for industry bodies—including retailers, caterers and manufacturers—to encourage sustainable production practices by raising internal procurement standards. It is discouraging that, aside from a few examples of good practice,[642] this is not yet happening. In the absence of responsible industry behaviour, the Government could encourage a 'race to the top' by mandating bodies to report on their sustainability performance.

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639 Q 75 (Dr Tara Garnett)
640 Committee on Climate Change, *Land use: Policies for a Net Zero UK*, (23 January 2020): https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/ [accessed 30 June 2020]
641 Q 75 (Professor Andrew Balmford)
642 For example, the sustainable fishing practices outlined in written evidence from Sainsbury's (ZFP0034).

490. A Food Foundation Report was highly critical of gaps in reporting on some sustainability and health metrics, most of which are voluntary.[643] Some of our evidence argued for a consistent and mandated sustainability reporting regime. Requiring data from local businesses such as supermarkets, large processors and large public procurers could encourage more pro-sustainability behaviour in supply chains and would provide a way of holding the industry to account. This data could be publicly available to NGOs, Government and, crucially, consumers. There is a possibility that this reporting would encourage a race to the top, with industry competing–if not to be the best, then at least to avoid being labelled the worst.

491. Dr Morley highlighted the "importance of data and mandating reporting from the food system"[644] as a key priority. He told us that: "if we can mandate certain parts of the food system to report different sustainability metrics and incentivise other smaller businesses to do the same, it would go a long way towards identifying a route to manage the transition to a more sustainable food system."[645]

492. Supermarkets, public procurers, and manufacturers could be required to publish a measurement of performance against a variety of relevant metrics. These could include (among many others): carbon impact, food waste, the use of water-stressed regions, the percentage of products produced under sustainable production practices, the percentage of products certified to high animal welfare standards, the price of a basket of sustainably produced basics and the price of a basket of healthy basics.

493. ***Government must implement a mandatory reporting regime for adherence to clear and consistent sustainability and health metrics, as well as adherence to procurement standards. This should apply to all supermarkets, major food and drink manufacturers, public procurers and their contracted suppliers, and food outlets.***

Food waste

494. Food production produces waste at every stage: both pre and post-farm gate. Dr Morley told us that: "between a third and perhaps a half of all food that is produced does not get to its end consumer."[646] Steve Butterworth, CEO of Neighbourly, stated that: "if global food waste was a country it would be the third largest contributor to the climate crisis in CO_2 emissions globally, after the US and China."[647]

495. British Growers told us that the demand (from retailers and consumers) for consistent supply and 'perfect' produce means that farmers often cannot avoid food wastage.[648]It is another example of farmers being trapped in the 'economic paradigm' discussed in paragraph 414. Clearly, this is a problem that cannot be resolved by Government alone, it will require a shift in retailer behaviour.

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643 The Food Foundation, *Plating Up Progress: Part 2, 'Must-Have' Metrics*, (September 2019): https://foodfoundation.org.uk/wp-content/uploads/2019/08/Plating-up-Progress_Report2_DIGITAL.pdf [accessed 30 June 2020]. Voluntary disclosures are often assisted by the work of the Carbon Disclosure Project and often include reports on GHG emissions, energy use and contribution to deforestation.

644 Q 79 (Dr Adrian Morley)

645 *Ibid.*

646 Q 74 (Dr Adrian Morley)

647 Q 50 (Steve Butterworth)

648 Written evidence from British Growers (ZFP0090)

496. Efforts to reduce food waste have largely focused on food waste that occurs after the food has left the farm (post-farm gate). In 2016 the DEFRA-backed Waste and Resources Action programme (WRAP) launched the Courtauld Commitment, a voluntary agreement with a target to reduce post-farm gate food waste by 20% per capita.[649] The Government, however, told us that progress towards cutting food waste has "plateaued"[650] in recent years. The Government's evidence to the Committee pointed to its 2018 Resources and Waste Strategy,[651] and highlighted two separate attempts to redistribute surplus food: the appointment of a champion, and the introduction of a £15 million fund for the redistribution of surplus food.[652]

497. The Sustainable Food Trust (SFT) called for more concerted effort on waste. They argued for a new ambitious target which would include pre-farm gate food waste. "In line with SDG 12.3, the SFT believes that the UK Government should cut food waste per capita by 50% before 2030, starting from post-harvest losses and going through production and supply, all the way to consumption."[653]

498. The tight specifications on the shape and size of produce that can be sold and the practise of overproduction mean that farmers are compelled to throw away a substantial amount of produce. Evidence from British Growers argued that: "the big issues for growers is around retailer programming". They gave the example of lettuce production which must be grown to meet possible demand but "can't be turned off" if demand reduces as a result of cold weather or other factors which may influence consumer demand.[654]

499. The House of Commons Environment, Food and Rural Affairs Select Committee recommended that retailers should relax quality standards to allow "wonky vegetables"[655] as part of their main range to avoid the situation where good food is thrown away because it does not fit narrow supermarket specifications. We endorse the 2014 findings of the House of Lords European Union Committee which recommended renewed effort by businesses to promote cooperation and shared financial responsibility for food waste early in the supply chain. They said efforts should, amongst others, include:

> "careful consideration of contractual requirements in the sector, including much wider use of long-term contracts and ones where the relationship between different ends of the supply chain does not encourage overproduction; the encouragement of whole-crop purchasing; and improvements to forecasting."[656]

500. The Environment Bill rightly includes provision to reduce household food waste. It also enables the Government to introduce producer responsibility

649 WRAP, 'The Courtauld Commitment 2025': https://www.wrap.org.uk/food-drink/business-food-waste/courtauld-2025 [accessed 29 June 2020]
650 Written evidence from HM Government (ZFP0079)
651 Department for Environment, Food and Rural Affairs, *Resources and waste strategy for England* (18 December 2018): https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england [accessed 30 June 2020]
652 Written evidence from HM Government (ZFP0079)
653 Written evidence from the Sustainable Food Trust (ZFP0007)
654 Written evidence from British Growers (ZFP0090)
655 Environment, Food and Rural Affairs Committee, *Food waste in England,* (Eighth Report, Session 2016–17, HC 429)
656 European Union Committee, *Counting the Cost of Food Waste: EU Food Waste Prevention* (10th Report, Session 2013–14, HL Paper154)

schemes in the future under the polluter pays principle.[657] We welcome these inclusions but there is limited focus on food waste which can arise before the food leaves the farm ("pre-farm gate"). The Courtauld targets account only for "post-farm gate" waste but pre farm gate waste is estimated to exceed that from hospitality and food service and retail combined.[658] In the instance of pre-farm gate food waste, the retail industry must take some responsibility.

501. ***Progress in tackling food waste will not be achieved without meaningful action from the retail sector. The Government should embark on a concerted effort to encourage sustainable purchasing behaviour from retailers. Consideration should be given to financial disincentives for retail or purchasing practices which lead to excessive pre-farm gate food waste.***

657 Department for Environment Food and Rural Affairs, *Waste and resource efficiency factsheet, part 3* (13 March 2020): https://www.gov.uk/government/publications/environment-bill-2020/10-march-2020-waste-and-resource-efficiency-factsheet-part-3 [accessed 29 June 2020]

658 WRAP, *Food surplus and waste in the UK - key facts* (January 2020) p 4: https://wrap.org.uk/sites/files/wrap/Food_%20surplus_and_waste_in_the_UK_key_facts_Jan_2020.pdf [accessed 30 June 2020]

CHAPTER 7: GOVERNANCE, ACCOUNTABILITY AND FOOD POLICY

502. We heard repeatedly of the need for 'whole system change'. We recognise that this call reflects the serious concerns that individuals and organisations have about the state of the food system; to many, a systemic shift is required. It was also evident that what 'whole system change' might look like, what it might involve and how it might be realised, are issues that many organisations are still grappling with. We agree that a radical shift is required but have avoided simply calling for whole system change without quantifying what that means. In previous chapters, we have outlined points at different stages of the system where positive change could be realised—primary production, food manufacturing; and the food environment—to help ensure that more people can access a healthy, sustainable diet.

503. The most compelling arguments about how to stimulate broader system change were about how food policy might be better coordinated, and how the Government can be held more accountable for achieving improvements in food, health and sustainability. Witnesses criticised the absence of a coherent strategy on food and the lack of coordination there has been in tackling the interrelated issues of food insecurity, diet-related ill health and food sustainability.

504. As we have detailed elsewhere in the report, the outbreak of COVID-19 has exacerbated the serious, systemic problems with the food system that our inquiry has focused on. The crisis will have serious and long-term effects on the economy and on public health. It also appears that COVID-19 disproportionately affects groups with poor dietary health, and those living in more deprived areas. It is, therefore, more important than ever that an overarching strategy for the food system is put in place, one that is effectively coordinated and rigorously monitored, so that progress on the issues of food insecurity, poor diet and environmental sustainability can, at last, be realised.

505. The prospect of the National Food Strategy provides us with a great deal of optimism that the challenges relating to the role and impact of the food system might finally be addressed under an overarching strategy, allowing for a coordinated approach to the multi-disciplinary issues that exist. While we do not wish to pre-empt the findings of Mr Dimbleby's review, the evidence we received allows us to offer some insight into what might help to support and secure any future national strategy for food. The key themes to emerge were that:

   (a) There needs to be a clear ambition set, by the Government, for what it wants the food system to achieve. That ambition should be supported by a comprehensive understanding of the scale of the issues involved, and the links between them;

   (b) Any ambitions set for a national food strategy need to be underpinned by strong accountability measures, with progress against targets reported on by Ministers to Parliament on a regular basis; and

   (c) There is a need for stronger coordination and integration of the policies that govern what the UK population eat and the ability to access a healthy, sustainable diet.

506. In recognition of the central role played by food manufacturers, retailers and the food services sector in influencing both the composition of food, and the environment in which is it made available to the consumer, the Government must ensure that as the National Food Strategy takes shape, it continues to engage with these sectors, to ensure that they play their part in effecting positive change within the food system.

Setting an ambition for the food system

507. A prominent concern raised was that the Government has not yet set an overarching ambition for what the food system should achieve in this country. When asked what the most significant challenge facing the food system is, Professor Lang (amongst others) stated: "The problem is lack of vision. We do not have a national food policy." Anna Taylor agreed with this assertion, stating:

> "Particularly when it comes to diet, we have a situation now where the lack of collective vision for the food system across government, citizens and business gets in the way of our developing good and coherent policy."[659]

508. We were told that the lack of a unifying ambition or strategy on food prevents interrelated issues such as hunger and health, and the food environment and food sustainability, from being considered in parallel, meaning that opportunities are missed to develop coherent policies that could stimulate positive change. Importantly, stronger coordination and integration would allow for a more comprehensive analysis of the inevitable trade-offs involved in achieving health, environmental and food security ambitions. UK Research and Innovation, referring to food insecurity specifically, highlighted that:

> "UK food insecurity is caused by a complex network of factors, including the types of food being produced and manufactured, local food infrastructure, physical access to food outlets, the purchasing power of individual consumers and socially acceptable consumption norms, however, poverty is the key driver which impacts the other factors. A food systems approach is essential for considering the inter-relationship between these factors, identifying win-wins, managing trade-offs and helping to mitigate less desirable outcomes."[660]

509. In one of its follow-up reports on the Sustainable Development Goals, the House of Commons Environmental Audit Committee concluded that food insecurity and hunger had "fallen between the cracks in Government plans." It criticised the Government for failing to understand the relationship between food insecurity, hunger and malnutrition and stated that:

> "The issues of food insecurity, hunger, malnutrition and obesity should be considered in parallel in the UK context. They are often co-located and share causal factors. For example, insufficient access to food may lead to risk-averse purchasing habits and prioritisation of low-priced, filling foods with long shelf lives - which are often nutrient poor but calorie-rich."[661]

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659 Q 2 (Anna Taylor)
660 Written evidence from UK Research and Innovation (ZFP0039)
661 Environmental Audit Committee, _Sustainable Development Goals in the UK follow up: Hunger, malnutrition and food insecurity in the UK_ (Thirteenth Report, Session 2017–19, HC 1491)

510. In our inquiry, we were tasked with taking a broader view, to consider the issue of food insecurity and its links to public health, but also to factors within the wider food system, the impact of the food environment and food sustainability. Our frustration is that the Government is failing to consider the links between these issues.

511. We were made aware of the ongoing work in both Scotland and Wales to develop national food policies. We have outlined the work that is being done in Scotland and Wales in more detail later in this chapter but broadly, there was recognition within the evidence of the benefit of the coordinated approach taken by both countries in drawing together food, health, the environment and inequalities under one overarching strategy. Professor Lang commented that:

> "In Wales, the Well-being of Future Generations (Wales) Act has had a fundamental impact on getting the Wales Government to think about their rural policy in relation to their health policy in relation to their schools policy. In Scotland, the good food nation process, very ably pushed and promoted by an extremely articulate and well-organised civil society movement that goes from public health professions to straight NGOs has been trying to think about what a small country can do …"[662]

Professor Lang went on to comment that:

> "I would not have mentioned them [Scotland and Wales] if they were not addressing exactly the agenda of this Committee. Both are addressing health, environment and inequalities, because both those countries— they are countries—have major problems on those fronts."

National Food Strategy: England

512. When Henry Dimbleby's review was announced in June 2019, the Government acknowledged that there had not been a national food strategy in England for 75 years (since the post-war 1947 Agriculture Act). DEFRA stated that the purpose of the National Food Strategy is to: "set out a vision for the kind of food system we should be building for the future, and a plan for how to achieve that vision."[663]

513. We recognise that COVID-19 may have an impact on the timings of the publication of the review but Mr Dimbleby told us that when his final review is published, the Government had made a commitment to respond within a defined timescale. He explained:

> "The Government have already said that they will respond to the report with a White Paper six months after it is published. They have asked me to come back to review progress another 12 months after that. The ambition for what we recommend is to try to get as much embedded as agreed action on publication."[664]

514. There was strong support for work that is underway to develop the National Food Strategy. This support was generally based on the assertion that the

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662 Q 2 (Professor Tim Lang)

663 Department for Environment, Food and Rural Affairs, *Developing a national food strategy: independent review 2019 : terms of reference* (updated 17 August 2019): https://www.gov.uk/government/publications/developing-a-national-food-strategy-independent-review-2019/developing-a-national-food-strategy-independent-review-2019-terms-of-reference [accessed 30 June 2020]

664 Q 104 (Henry Dimbleby)

absence of an overarching policy was undermining any progress that could be made to tackle the negative impacts of the way the food system currently functions. The Government has stated that work on the review has been temporarily paused so that the team can concentrate on supporting the COVID-19 response, but that its work does remain a priority.[665]

515. **A national food strategy for England is long-overdue. It provides a much-needed opportunity to initiate a strategic, joined-up approach to food policy.**

516. *We recommend that the Government should remain committed to responding to the National Food Strategy review with a White Paper within six months of the review's publication. It should commit to action the review's recommendations on publication.*

517. We were also directed to consider the work that is being taken in the devolved nations to develop their own national food strategies. This provided us with examples of what kinds of policy strands should be brought under the banner of "food policy" and informed us about the overarching ambitions these countries have set for their food systems. This evidence focused on Scotland and Wales and we have briefly outlined the approaches taken by the two countries below.

Scotland

518. In 2009, the Scottish Government published *Recipe for Success–Scotland's National Food and Drink Policy.*[666] In 2014, it published its national food and drink policy: *Becoming a Good Food Nation.*[667] This articulated a new aspiration, to make Scotland by 2025: "a Good Food Nation, where people from every walk of life take pride and pleasure in, and benefit from, the food they produce, buy, cook, serve, and eat each day."[668]

519. In setting out the activities that it is undertaking to meet the aims of the Good Food Nation policy, the Scottish Government has been clear that it does not consider legislation "essential to delivering action" on its Good Food ambitions but that "legislation may help to underpin key measures and activity. As such, it has committed to introducing a Good Food Nation Bill to "underpin the significant work already undertaken across Government in terms of key measures and activity to deliver a Good Food Nation."[669] The Scottish Government have said that in work on their Good Food Nation Bill they will: "focus on embedding processes for ensuring that the substance of the right to food has effect as a matter of everyday good practice."[670]

520. To help develop its policy, a non-statutory Scottish Food Commission was established to "provide advice on the existing and future challenges facing Scotland's food culture and how these might be addressed." The Commission identified five key priorities for the Good Food Nation policy: health, social

665 Supplementary written evidence from HM Government (ZFP0098)
666 Scottish Government, *Recipe for Success: Scotland's national food and drink policy* (18 June 2014): https://www.gov.scot/publications/recipe-success-scotlands-national-food-drink-policy/ [accessed 30 June 2020]
667 Scottish Government, *Good Food Nation Policy*: https://www.gov.scot/policies/food-and-drink/good-food-nation/ [accessed 30 June 2020]
668 *Ibid.*
669 Scottish Government, *Good Food Nation: consultation* (21 December 2018): https://www.gov.scot/publications/good-food-nation-proposals-legislation/pages/3/ [accessed 30 June 2020]
670 *Ibid.*

justice, knowledge, environmental sustainability and prosperity.[671] Having also developed recommendations for the scope of the related legislation, the Commission has now disbanded.

521. George Burgess, Head of Food and Drink at the Scottish Government, told us that: "All the work within the Scottish Government is informed by our national performance frameworks, a set of outcomes and indicators that we use across the whole of Government."[672] These performance frameworks measure progress or regression against 81 metrics (including several on hunger, health and environmental sustainability) based upon the United Nations Sustainable Development Goals.[673]

522. The Scottish Programme for Government 2019–2020 contained a commitment to bring forward a Good Food Nation Bill in this term and we understand that work was underway to prepare the Bill for introduction.[674] The Scottish Government has recently stated, however, that due to the need for parliamentary time to debate and implement emergency COVID-19 legislation, the Bill will not now be introduced in this parliamentary term.[675]

523. There was support expressed for the approach taken by the Scottish Government. Dr Koldo Casla from the Institute of Health and Society at Newcastle University, for example, said:

"While it is too early to tell what the Bill will look like in practice, if done properly it could provide a new framework for a coherent food policy, facilitating a transition to a fair, healthy and sustainable food system that ensures access to nutritiously adequate, accessible and affordable food, as expected in international human rights law."[676]

Wales

524. The Welsh Government published its food strategy 'Food for Wales, food from Wales 2010–2020' in December 2010. The strategy aimed to consider: "health, food culture and education, food security, environmental sustainability and community development to provide the basis for an integrated approach to food policy in Wales."[677] The strategy identified four key principles: sustainability, resilience, competitiveness; and profitability.[678] The foreword for the strategy stated that: "The direction here is radical and faces up to the challenges of ensuring that people have access to the affordable and healthy food they need whilst ensuring that this does not impact adversely on the natural environment."[679]

671 Scottish Food Commission, *Interim Report* (February 2016), p 6: https://www.gov.scot/binaries/content/documents/govscot/publications/corporate-report/2016/06/food-commission-interim-report/documents/scottish-food-commission-interim-report-pdf/scottish-food-commission-interim-report-pdf/govscot%3Adocument/Scottish%2BFood%2BCommission%2Binterim%2Breport.pdf [accessed 30 June 2020]

672 Q 112 (George Burgess)

673 Scottish Government, *National Performance Framework, What it is:* https://nationalperformance.gov.scot/what-it [accessed 30 June 2020]

674 Scottish Government, *Good Food Nation Policy*: https://www.gov.scot/policies/food-and-drink/good-food-nation/ [accessed 30 June 2020]

675 *Ibid.*

676 Written evidence from Dr Koldo Casla (ZFP0012)

677 Welsh Assembly Government, *Food for Wales, food from Wales 2010–2020* (December 2010) p 5: https://gov.wales/sites/default/files/publications/2018–05/food-strategy-for-wales-2010-to-2020.pdf [accessed 30 June 2020]

678 *Ibid.*, p 2

679 *Ibid.*, p 3

525. David Morris, deputy head of the food division in the Welsh Government explained to us:

> "Our current action plan, which was the operational way to deliver the food for Wales and food from Wales strategy, was published about 10 years ago and completes in 2020. It had a number of overriding objectives: to establish a food industry board in Wales; to grow the Welsh brand; and to upscale the industry, in the food manufacturing sector workforce primarily. It had lots of initiatives and actions to grow business and trade development, and a number of actions around the area of food safety and food security, which included some public health and nutrition actions."

526. Mr Morris confirmed, when asked, that the primary objective of the strategy was growing the food industry in Wales.[680] Mr Morris stated:

> "That strategy is complete. We had an overall growth turnover target of £7 billion for what was the food and farming priority sector. That was the way it was defined. We aimed to achieve that target by 2020 from a baseline of just over £5 billion in 2013. We have exceeded that target. At the end of 2019, we had reached £7.473 billion."[681]

527. The Food for Wales strategy ends in 2020. The Welsh Government and the Food and Drink Wales Industry Board are jointly producing a new plan to support the sector. Mr Morris confirmed that a follow-on food strategy was consulted on in 2019, and that a new food strategy would be announced later in 2020.[682]

528. Wales has also introduced The Well-being of Future Generations (Wales) Act 2015, that requires public bodies in Wales to "think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change".[683] Mr Morris explained how the Well-being Act impacted on the development of its food strategy:

> "For example, when we are developing our food strategy, we must go through a policy gateway process. There is a mapping exercise of our proposals in relation to the well-being goals. There are seven well-being goals: a prosperous Wales; a healthier Wales; a more resilient Wales; a Wales of cohesive communities; a Wales of vibrant culture; a thriving Welsh language; and a globally responsible Wales."[684]

529. Mr Morris also explained the role of the Future Generations Commissioner whose role is to ensure that policy, including food policy, adheres to its goals. Mr Morris said:

> "Public bodies have to identify their own future generations actions to deliver on the Act. They have to report annually to the commissioner on what they are doing and what they have achieved. The commissioner will then provide feedback and may make recommendations for change.

680 Q 112 (David Morris)
681 *Ibid.*
682 *Ibid.*
683 Future Generations Commissioner for Wales, *Well-being of Future Generations (Wales) Act 2015*: https://futuregenerations.wales/about-us/future-generations-act/ [accessed 30 June 2020]
684 Q 113 (David Morris)

There is quite a lot of governance around it. Public service boards in each of the local authorities take an active role for the local authority in delivering and taking forward actions appropriate to delivering the future generations Act and its well-being goals."[685]

530. We recognise that work in both nations is still ongoing and that there are challenges remaining for both countries. The examples, however, were useful in considering what priorities the Government may want to consider in any future national food strategy for England. Most notably, both strategies brought together different strands of food policy, both approaches are underpinned by some form of legislation and by accountability frameworks.

Monitoring and accountability

531. If the Government wants to set ambitions for the food system, through a national food strategy, it will be imperative that there are robust mechanisms in place for judging progress against those goals. Amongst others, the Food Foundation, LSHTM and SHEFS, suggested that the Government needs a revised set of metrics to drive improvement across the food system. The submission advocated for the introduction of:

"a number of metrics and targets which government and businesses operating in the food system should report on to parliament on a periodic basis. These could include levels of childhood obesity, levels of household food insecurity, greenhouse gas emissions associated with our diets etc."[686]

Similarly, Dr Adrian Morley emphasised the importance of data and mandating reporting from the food system, stating that:

"If we had a lot more information, with information publicly available for NGOs and different stakeholders in the system, to understand the consequences of individual dietary and purchasing choices, and if we can mandate certain parts of the food system to report different sustainability metrics and incentivise other smaller businesses to do the same, it would go a long way towards identifying a route to manage the transition to a more sustainable food system. In a nutshell, it would be data."[687]

532. Kate Halliwell from the Food and Drink Federation highlighted that there is not, at present, a mechanism for measuring overall progress towards health and sustainability goals. Ms Halliwell stated that:

"As far as I am aware, the Government do not have an overarching metric for healthy and sustainable diets. I know it is work that the Food Foundation has looked at, specifically in retail and out of home. It is something that my members are interested in, so at the start of the year we had the Food Foundation in to talk through its work, and about what metrics might be appropriate for industry to look at to cover the issue as a whole."

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685 Q 113 (David Morris)

686 Written evidence from the Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS) (ZFP0073)

687 Q 79 (Dr Adrian Morley)

"We have various sustainability metrics, some of which are government led and some of which are ours, but there is no overarching one. For example, our company's report was about carbon and water use. We know that the Environment Bill is going to look at metrics, and presumably the national food strategy will look at the metrics that cover this piece. At the moment, we are not aware of an overarching one."

"Specific to health, we have reports about sugar and salt in the Kantar datasets that the Government look at, so it is not an overarching health metric; it is quite nutrient specific."[688]

533. The Scottish Government highlighted how progress for meeting it target's on food policy were monitored though its national performance framework. In addition, Mr Burgess detailed proposals outlined in the Good Food Nation proposals for legislation consultation (2018), the central component of which was that "the focus of any legislation could be a clear framework that placed responsibilities on Scottish Ministers and specified bodies to publish and adhere to statements of policy on food."[689] This statement would be required to cover food production and consumption issues, and compatibility with relevant EU obligations. Mr Burgess explained that:

"We consulted on a proposal that Ministers and a range of public bodies would have to set out a statement of their policy on food, with a holistic approach to their policies. They would have to report on that and, to make sure that it is not just a policy that once written sits on a shelf, take it into account in delivering relevant functions. That applies to the Scottish Government themselves, and to local authorities and other key bodies. That is the proposal. It was pretty widely welcomed by the stakeholders and respondents to our consultation."[690]

534. The consultation set out that Scottish Minsters would also need:

- To include indicators or measures of success.

- To publish the statement of policy and to lay it before the Scottish Parliament, for information rather than approval.

- To report every two years on implementation of the policy and to set out information on the indicators or measures of success. This report would be published and laid before the Scottish Parliament in order to ensure transparency and accountability.

- To have regard to relevant international obligations and guidance; relevant instruments and guidance would be specified in secondary legislation.[691]

535. We are convinced by the need for strong accountability measures to support the aims of any national food strategy: without it the Government may miss the opportunity to develop coherent policy to address overarching issues, and

688 Q 71 (Kate Halliwell)
689 Scottish Government, *Good food nation proposals for legislation: analysis of consultation responses* (11 September 2019): https://www.gov.scot/publications/good-food-nation-proposals-legislation-consultation-analysis-report/ [accessed 30 June 2020]
690 Q 113 (George Burgess)
691 Scottish Government. *Good Food Nation proposals for legislation: analysis of consultation responses* (11 September 2019): https://www.gov.scot/publications/good-food-nation-proposals-legislation-consultation-analysis-report/pages/3/ [accessed 30 June 2020]

to stimulate widespread change. There are a number of targets for driving improvement in the food system (including reformulation targets, targets on reducing obesity, and some targets that relate to reducing the environmental impact of food production) and some notable omissions (such as targets to reduce food insecurity and food waste). It is clear that current policies relating to food are too fragmented. As Kate Halliwell noted:" It would be helpful for [the Government] to focus on trying to deliver across the whole range of interventions that have so far been proposed."[692]

536. **The development of a national food strategy provides an important opportunity to bring all policies related to the food system under an overarching aim to provide equitable access to healthy and sustainable diets.**

537. *In advance of the publication of the National Food Strategy review's final report, the Government should review levels of reporting on health and sustainability across the food system, to identify where gaps might exist in the current data sets that are available.*

538. We propose that underpinning any national food strategy should be a strong accountability framework; the framework should have precise objectives, targets and timescales. A range of targets relating to the food system could be brought under the umbrella ambition of making a healthy and sustainable diet accessible to everyone. Based on the evidence we received, we suggest that the Government should review and reset targets in the following areas:

- Reducing levels of household food insecurity (based on improved monitoring as referred to in chapter three, Poverty and food insecurity).

- A reduction in childhood obesity rates. The Government should review its target to halve childhood obesity by 2030 and potentially set interim targets before 2030 to help drive progress.

- A reduction of inequalities in diet-related ill health. The most recent Marmot review of health inequalities concluded that little progress has been made on reducing the gap in health outcomes between income groups.

- The Government should consider setting mandatory reporting metrics aimed at monitoring the performance of businesses in the food system towards making healthy and sustainable food more accessible (as outlined in paragraphs 492 and 493).

539. *The Government should develop and introduce a standardised set of mandatory reporting metrics aimed at monitoring the performance of Government departments and assessing progress made by the industry towards making healthy and sustainable food more accessible. The Government and the industry should be required to report on progress against those targets on a regular basis.*

The 'right to food'

540. In discussions around how the Government might be better held accountable for driving wider system change to the food system, the concept of the 'right to food' was advanced by a number of the organisations who provided evidence.

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692 Q 71 (Kate Halliwell)

Its advocates, including Sustain[693] and Nourish Scotland[694], believe that the right to food should be embedded into UK law. Although this approach was primarily related to addressing food insecurity and hunger, some suggested that such a right would drive concerted and co-ordinated action towards enabling access to a healthy diet for all, by:

- Establishing the norm that everyone in the UK should have access to a healthy diet;

- Obliging Government to assess progress against this target;

- Establishing transparency in progress made;

- Providing a 'benchmark' against which future legislation and policy could be assessed for impact on food matters; and

- Providing the opportunity for redress and opportunities for other bodies to intervene within a rights framework.

541. We were grateful to Sustain, who invited members of the Committee to a roundtable discussion on 3 March 2020, with academics and representatives from different interested organisations, to discuss the merits of the 'right to food' being enshrined in UK law. Over the course of the discussion, participants suggested that a 'right to food' could provide a benchmark in order to assess potentially negative effects of other policy decisions on food provision, and that it could set a basic and consistent norm that people (and particularly children) are entitled to food. Participants also suggested that it could act as an accountability framework to ensure that governments must fulfil certain minimum standards. It was highlighted that the right to food is recognised in 16% of countries globally. However, there were concerns raised that there would be difficulties in interpretation and enforcement, particularly for local authorities, and there was some discussion about difficulties of embedding the right to food constitutionally.

542. The right to food has featured in considerations about the Good Food Nation Bill in Scotland. Dr Donald Macaskill, Chief Executive at Scottish Care, representing the Scottish Food Coalition, argued that:

> "We see the good food Bill as a prime opportunity for Scotland to incorporate the right to food in areas that are devolved to the Scottish Parliament, recognising that it does not include all areas, and we would argue that that provides consistency of application. It would enable read-across to, for instance, the right to social security, which is being much embedded in the new social security practice in Scotland, and the right to health that, through our national frameworks and standards, is embedding itself in health and social care."[695]

543. George Burgess from the Scottish Government offered a counter to this argument, suggesting that existing legislation on standards of living provide sufficient cover. Mr Burgess told us that:

> "Our consultation did not propose that a right to food would be contained in the good food nation legislation. We recognise the existence of a

693 Written evidence from Sustain (ZFP0071)
694 Written evidence from Nourish Scotland (ZFP0064)
695 Q 133 (Dr Donald Macaskill)

right to food as part of wider rights to an adequate standard of living, as Donald mentioned, in some of the international instruments. Our Bill will require Ministers and others, when setting their policy, to have regard to existing international instruments."[696]

544. Anna Taylor offered another perspective, stating that:

"In some ways, whether or not you badge it as rights does not matter too much. The point is that you need to be able to enshrine something around your aspirations for a healthy and affordable diet that creates a reference point for other areas of government intervention."[697]

545. On balance, although the intentions of the 'right to food' are laudable, the same aims could be achieved through strengthened national governance around food policy, improved monitoring of food insecurity (as outlined in Chapter three) and by ensuring that the aims of any national food strategy are supported by robust accountability measures.

Co-ordination of food policy

546. Another key criticism to emerge about the Government's approach to food policy was that there was a lack of coordination across Government for food policy. The argument was rehearsed that issues such as poverty, food insecurity and poor health are often co-located and often share causal factors, and because those relate and are impacted by the wider food environment, the Government should take a more strategic approach to the co-ordination of food policy across government departments. To repeat Henry Dimbleby's point:

"There are very specific ways in which government's objectives are not aligned. At the moment, DEFRA and Trade have very different objectives in our trade negotiations with other countries. There is a constant running battle between BEIS and Health on proper regulation of retailers and food producers."[698]

547. Several other witnesses expressed frustration that there was no one body that takes overall responsibility for food at a governmental level. The Sustainable Food Trust raised concerns about the lack of coordination, and argued that:

"Westminster should prioritize working across departments to create an integrated approach to nutritional recommendations and encourage diets that are aligned with the environmental capacity of the ecosystem and the productive capacity of the UK …"

" … Currently, this type of integrated Government policy is not the case, as the Department of Health and the Department of the Environment, Food and Rural Affairs (DEFRA) work separately from each other. This type of siloed working minimizes the opportunity for collaboration and a synergistic approach to nutrition and healthy diets. "[699]

548. Representatives from Government departments were questioned on the extent to which the issues of food insecurity, poor dietary health and food

696 Q 133 (George Burgess)
697 Q 2 (Anna Taylor)
698 Q 100 (Henry Dimbleby)
699 Written evidence from the Sustainable Food Trust (ZFP0007)

sustainability are tracked at a cross-departmental level. Alison Ismail detailed some co-ordination between departments:

> "The first thing I would stress is that we are lucky enough to have informal relationships between ourselves and our teams, so there would be very frequent interactions just by picking up the phone and making sure that we have the same line of sight on developments and testing things informally with each other. That is really important, but I would also reference our developing plans for a food strategy, which is absolutely in its terms of reference set out to be a cross-Whitehall endeavour, owned by all of us, and indeed by other departments. We have a governance infrastructure around that, including a group supported by Permanent Secretaries, where directors-general represent each department to ensure that we have that absolute senior level buy-in and support for what we are bringing together."[700]

Ms Ismail confirmed, however, that there was no formal ministerial group set up to consider these issues.[701]

549. Some organisations have sought to expose the issue of Government coordination on food policy even further by questioning where the responsibility for food insecurity rests within the Government. The Environmental Audit Committee has previously highlighted what it saw as a gap in ministerial responsibility and had called for a Minister for Hunger to be appointed "to ensure cross-departmental understanding and action on this important issue".[702] When questioned as to whether there was any further clarity as where the responsibility for food insecurity lay, Alison Ismail told us that:

> " … if you are thinking about governance, this is an area where there is a bit of a trade-off between accountability in the sense of one named Minister or department and genuinely shared ownership of a problem or a phenomenon. Food insecurity is with DEFRA. It is probably a bit of a philosophical question as to whether food insecurity is an exact synonym for hunger. That would be an interesting question to get into. I would not want to overstate the progress made on that particular question since it was last considered by you. It is a good challenge for us to take away for this time next year, to see whether we have a clear story on whether that particular issue is jointly or individually owned."[703]

550. We were told that in Scotland, efforts have been made to ensure a degree of coordination across departments with regards to food policy. George Burgess, Head of Food and Drink at the Scottish Government explained:

> "Within government, we have established a ministerial working group on food, to help to ensure that we have join-up across government. A good number of our senior Ministers are directly engaged in that. Under the good food nation proposals we referred to earlier, the Bill, as well as setting out the policy on food, will require regular reporting by

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700 Q 19 (Alison Ismail)
701 *Ibid.*
702 Environmental Audit Committee, *Sustainable Development Goals in the UK follow up: Hunger, malnutrition and food insecurity in the UK* (Thirteenth Report, Session 2017–19, HC 1491)
703 Q 20 (Alison Ismail)

the Scottish Government and other authorities on their progress against their policies."[704]

551. **We see the establishment of a ministerial working group as essential to improving the level of coordination across Government on the interrelated issues of food insecurity, poor dietary health and food sustainability. This group should be chaired by a senior member of the Cabinet.**

552. *The Government must ensure that the appropriate Whitehall infrastructure is in place to ensure that the aims of the forthcoming National Food Strategy can be co-ordinated effectively across Government departments.*

553. Concerns around the lack of coordination on food policy led some witnesses to advocate for an individual or an independent body to bring greater coherence across Government on food policy. Many contributors have suggested that there is a need for a body to hold the Government to account over progress on food policy.

554. A good deal of support was expressed for the work of the Food Standards Agency's oversight of the salt reduction programme. It was praised for its ability to demonstrate how, when programmes are introduced that aim to compel the food industry to make meaningful change, with transparent and robust monitoring of industry progress, and firm oversight, the food industry can be held to account effectively, and change that will result in improvements to public health can be achieved.

555. *Given the success of the salt reduction programme under the Food Standards Agency, if industry fails to make the necessary progress against Government reformulation targets, the Government should return the responsibility for nutrition, labelling and reformulation programmes to the FSA, and provide it with the appropriate resources.*

556. Some called for an independent food commission, which would report annually to Parliament, on progress against agreed plans and targets, and issue recommendations on how to avoid regression with new policies.[705] Dr Donald Macaskill said:

> "Food is fundamental to our well-being and our health as a nation and as individuals. It deserves a holistic, overarching prioritisation that counters sectoral interests wherever they may be. It is not sufficient to have good legislation. It necessitates the force that an independent food commission would deliver in Scotland and, I suggest, elsewhere."[706]

557. We were also made aware of the work of the Welsh independent Future Generations Commissioner who is tasked with considering the long-term impact that policies and decisions have, and who is empowered to make recommendations to avoid regression. David Morris from the Welsh Government stated that the Commissioner did not have formal powers to require changes but that local authorities had "tended to comply."[707]

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704 Q 117 (George Burgess)
705 Written evidence from Nourish Scotland (ZFP0064)
706 Q 118 (Dr Donald Macaskill)
707 Q 113 (David Morris)

558. When asked about his views as to whether some form of independent oversight would be required to help deliver the aims of a future national food strategy, Henry Dimbleby responded:

> "It is clear to me that we need some structure to ensure ongoing co-operation, but whether that is a law, a department, an ALB [arm's length body] or a set of targets that the Government have to put together, I do not know yet. It is clear that we need something. If it just remained in DEFRA, the energy would dissipate very quickly."[708]

559. Advocates for such a body stated that it would increase accountability and transparency, and drive action., we consider that such a body could:

- Advise the Government on the implications of policy proposals as they relate to access to a healthy diet;

- Collate, and have oversight of, data, relating to the food system (including those relating to health, food insecurity and food sustainability) and the progress made against targets set in those areas.

- Report to Parliament on progress made against agreed plans and targets.

560. We consider that the Committee on Climate Change, as an independent, non-departmental public body which provides independent advice to the Government, and reports regularly to Parliament, could provide a blueprint for how an independent body, with responsibility for oversight of the National Food Strategy might operate.

561. The Committee asked DEFRA Ministers to outline what mechanisms will be put in place for the interdepartmental coordination of the delivery of the National Food Strategy, and whether DEFRA considered there was any case for an independent body to advise the Government on the progress of delivering the strategy. Victoria Prentis MP, Parliamentary Under Secretary of State for DEFRA responded by stating that:

> "Although DEFRA has lead responsibility for food, many Departments right across Government have a very strong interest; and as such, Henry and his team are engaging across Whitehall, as well as with partners across the whole food system, including academics, farmers, businesses, civil society and the general public, to develop their recommendations."

> "Government will respond to the Independent Review's recommendations when they have been submitted, including what interdepartmental and/or independent structures may be needed to support the strategy's delivery and monitor progress; the intention is that this will be in the form of a White Paper to be published within 6 months of the release of Henry Dimbleby's final report."[709]

Based on this response, it appears that the Government have not yet given any thought as to how the recommendations of the National Food Strategy will be coordinated across the relevant Government departments, nor how

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708 Q 103 (Henry Dimbleby)
709 Letter to the Chair, Lord Krebs, from Victoria Prentis MP, Parliamentary Under Secretary of State for DEFRA, 17 June 2020 (ZFP0096)

it will ensure that progress against the Strategy's recommendations will be overseen.

562. **Given the importance of food policy and its overriding impact across a range of sectors, we feel that there is a compelling argument for independent oversight of all aspects of food policy in England. As the National Food Strategy is a key opportunity for food policy to be embedded into other related policy areas, its recommendations should not be enacted by DEFRA alone, and some form of independent oversight is required to review the future implementation of its recommendations. The Government, however, does not appear to have given consideration as to how this might be achieved.**

563. *We recommend the establishment of an independent body, analogous to the Committee on Climate Change, with responsibility for strategic oversight of the implementation of the National Food Strategy. This should include the monitoring and reporting on progress made against the health and sustainability targets outlined in paragraph 538. This independent body should have the power to advise the Government and report to Parliament on progress.*

SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

Below is a list of all of the Committee's conclusions and recommendations (recommendations appear in italics).

Chapter 3: Poverty and food insecurity

1. *The relationships between dietary quality and food insecurity must be fully understood. The Government must commit to continuing to run the food insecurity measurement questions currently contained within the Family Resources Survey. To better understand the impacts of food insecurity on diet and related outcomes, the Government must determine how best to collect data on food insecurity and dietary intake in the same individuals.* (Paragraph 82)

2. The need for charitable food aid is a clear sign that the welfare system is failing to provide adequate support to people in the lowest income groups. The Government should not be reliant on charitable food aid to plug the holes in the welfare system. (Paragraph 96)

3. *The five-week wait for Universal Credit presents acute difficulties and requires urgent overhaul. While we cannot anticipate the findings of two Parliamentary reports dedicated to this topic, the Government must fully respond to the reports of both Committees. A replacement scheme must have regard to:*

    • *The recommendations of the House of Commons Work and Pensions Committee and the House of Lords Economic Affairs Committee;*

    • *Analysis of the impact of repayments over a period of time on the ability to afford a healthy diet;*

    • *The imperative to avoid a situation where a person awaiting benefits has no choice but to visit a food bank;*

    • *Analysis of data pertaining to the increase in UC claims following the outbreak of COVID-19;*

    • *The possibility that different groups of claimants may require different arrangements for advances and their repayment; and*

    • *A continual and effective system of training to help claimants manage their money.* (Paragraph 104)

4. We note that a group of the most vulnerable people, those with no recourse to public funds, are conspicuously absent from policy discussions on food insecurity. (Paragraph 109)

5. *We recommend that the Government produce an action plan to ensure that the gathering of data on food insecurity includes and records the situations of those with no recourse to public funds. Urgent planning must begin now to establish a Government-funded programme to ensure that all those with no recourse to public funds are able to access sufficient, nutritious food.* (Paragraph 110)

6. For many in low income groups, meeting the costs of the Eatwell Guide is unrealistic. Given the sizeable proportion of disposable income that many in lower income groups would have to spend to meet the recommendations of the Eatwell Guide, it is wholly unsurprising that so few people are doing so. (Paragraph 124)

7.   *The Government should be fully aware of the cost of eating the diet it recommends, and the ability of different demographic groups to access this diet. To underpin any national food strategy, the Government must, in its 2021 review of benefits rates, commit to giving its dietary guidance—the Eatwell Guide—a firm place in the development of policy.* (Paragraph 127)

8.   *The Government should embed consideration of the cost of the Eatwell Guide into calculations of benefit payment rates.* (Paragraph 132)

9.   *We recommend that the Government should undertake a fuller assessment of the cost of a healthy and sustainable diet. The cost of the Government's dietary guidance should be built in as a reference point to consideration of government interventions, including those relating to welfare and public food provision.* (Paragraph 133)

10.   For many, particularly those in the lowest income groups, food choices are about whether they will produce a feeling of being satiated. Choices made by people in lower income groups to prioritise food that is reliably satiating and prevents waste over a nutritionally balanced diet should be understood as a reasonable response to the economic reality they face. (Paragraph 140)

11.   There are a series of hurdles to overcome to access a healthy diet. These hurdles are particular to lower income groups, and their combined effect means that it is significantly harder for people with a lower income to access a healthy diet. The current food system requires much more of people with fewer resources. (Paragraph 150)

Chapter 4: The Food Environment

12.   The food environment actively and effectively encourages unhealthier choices because there is a powerful commercial incentive for the food industry to ensure that people purchase highly processed products. (Paragraph 159)

13.   The food environment has a substantially more negative impact on lower-income groups than their wealthier counterparts, and therefore directly contributes to rising health inequalities. (Paragraph 165)

14.   The failure to enact proposals to tackle childhood obesity has meant that levels of obesity and diet-related ill health have continued to rise. The glacial pace at which the Government has acted upon its own proposals to tackle childhood obesity is unacceptable. (Paragraph 176)

15.   *The value of the Healthy Start vouchers is insufficient. The vouchers must immediately be uprated. This uprating should be substantial, but as an absolute minimum it should enable recipients to purchase the same amount of food that could be purchased in 2009, when the scheme began. The amount must be linked to the Consumer Price Index thereafter.* (Paragraph 184)

16.   *Comprehensive reform of the Healthy Start Scheme is long overdue. The Government must release a wide-ranging consultation addressing "root and branch" reform before the end of 2020 and appoint a Healthy Start champion to raise awareness of the scheme among individuals and retailers.* (Paragraph 194)

17.   *The decision to increase the funding for lunches during school closures is welcome. The value cannot be allowed to regress once children return to school. The allowance allocated to schools for free school meals must be uprated to at least the level provided during the school closures and linked to inflation thereafter.* (Paragraph 201)

18. *We recommend that the Government outlines how it intends to mitigate the impact that their eligibility proposals will have on those families who will lose eligibility for free school meals.* (Paragraph 206)

19. *We recommend that the Government must undertake rigorous research on the impact of Universal Infant Free School Meals on health and attainment outcomes and use the results of this evidence base to inform future policy on school meals, including breakfasts.* (Paragraph 212)

20. The absence of any effective enforcement mechanism for school food standards means that the nutritional value of the food a child receives at school is one of chance rather than policy. It is difficult to understand what, in truth, the school food standards achieve. (Paragraph 228)

21. *Monitoring and evaluation of the school food standards must be centrally coordinated to ensure consistent compliance. The Departments for Education and Health and Social Care should establish a joint task force responsible for monitoring and enforcing adherence to the school food standards. The taskforce should have the power to publish the names of non-adhering schools and where necessary require the development of an agreed action plan to meet standards.* (Paragraph 229)

22. *We recommend that the eligibility threshold for the National Schools Breakfast Programme is lowered and funding increased to ensure that the programme reaches all of those who need it.* (Paragraph 241)

23. *The National Schools Breakfast Programme must support and train facilitators to enable schools to access future external funding.* (Paragraph 242)

24. *Notwithstanding Government support to access funds, central funding for the National School Breakfast Programme must not be withdrawn all at once, producing a 'cliff edge' effect. The funding must be removed gradually and only when schools are able to access reliable sources of funding to sustain the clubs.* (Paragraph 243)

25. *We recommend that the Government should significantly extend the funding provided through the Holiday Activities and Food programme to ensure that more children can access holiday clubs. It should use generous thresholds based on the Income Deprivation Affecting Children Index to determine which areas should receive this funding.* (Paragraph 253)

26. *The benefits of high and robust standards for public procurement and public food offerings are clear. The Government must strengthen and develop the Buying Standards for Food and Catering Services to ensure that they fulfil their potential to create a healthier and more sustainable food environment. In particular, the revised standards should:*

    • *Apply equally and consistently to all Government procurement, including the NHS, prisons and the armed forces;*

    • *Apply to all private suppliers contracted to provide food for the above;*

    • *Require a significantly higher proportion of food to be produced in line with the Publicly Available Integrated Production or Integrated Farm Management Standard than is currently required;*

    • *Embed nutritional standards based on the Eatwell Guide;*

    • *Disallow any escape clause, as currently exists, for measures on the basis of cost; and*

- *Provide for an enforcement mechanism.* (Paragraph 265)

27. *The proposals in Chapter 2 of the Childhood Obesity Plan to impose restrictions on the advertising of HFSS foods were welcomed by a large majority of our evidence. The Government must, by the end of 2020, roll out these proposals both for television and online.* (Paragraph 278)

28. *Proposals to end the product placement of HFSS foods in popular supermarket locations were welcomed. The Government must, by the end of 2020, enact them, ensuring that the ban covers the widest range of less healthy foods possible and includes small businesses.* (Paragraph 287)

29. *The Government must, by the end of 2020, act on their proposals to restrict price promotions on HFSS products.* (Paragraph 293)

30. The planning environment must support the efforts of local authorities to limit the proliferation of fast food outlets around schools. (Paragraph 304)

31. *The Government must conduct a review on the use of licensing and planning to ensure that:*

    (1) *local authorities are able to enforce exclusion zones of at least 800m around schools; and*

    (2) *when use of a building subject to use class A3 or A5 is transferred, new planning consent must be obtained.* (Paragraph 305)

32. *Immediately following the withdrawal of the permitted development rights introduced in March 2020, the Government should consult upon and enact a scheme to enable local authorities to charge out of home food outlets an amount of council tax which is in proportion to the healthiness of their food offering.* (Paragraph 306)

33. *The Government, in partnership with local authorities, should develop a scheme to support food retailer businesses, including those providing fast food, to develop and sell healthy alternatives. It should also determine and provide support to empower other kinds of food providers such as street vendors to sell healthy food in communities.* (Paragraph 312)

34. *The Government must publish its consultation on how to address the marketing and labelling of infant food without delay. The responses to that consultation, and the related measures to ensure parents and carers have accurate information on infant food products must be published in 2020.* (Paragraph 316)

35. *We recommend that the Government conduct a review of labelling on food and drink products. The findings of the review should form the basis of regulations which address both date labelling and the standardisation and simplification of front-of-pack traffic light labelling. The new regulations should be compulsory for all food manufacturers and retailers.* (Paragraph 324)

36. We note the potential and applaud the success of school-based schemes to encourage healthy lifestyles. We urge local authorities and school leaders, in discussion with classroom teachers, to build on the foundation already provided by the National Curriculum to integrate further education on healthy lifestyles into their offer. (Paragraph 333)

37. There is potential for increased investment in targeted public health messaging to help to encourage a shift towards healthier consumption patterns. (Paragraph 336)

38. Increasing public understanding of what constitutes a healthy and sustainable diet is an important element of efforts to improve the population's diet. Interventions designed to communicate information about food and nutrition must be adapted according the audience they are trying to reach. Crucially, they will be most successful when accompanied by other measures to address the underlying problems highlighted in this report which make it difficult to access healthy diets. (Paragraph 339)

Chapter 5: Reformulation and regulation

39. *The Government should review the current zero-rated VAT arrangements on some food products which are known to be energy dense, and contain high levels of salt, sugar and unhealthy types of fat. It should commence this review before the end of the transition period in 2020.* (Paragraph 378)

40. *As part of any future measures the Government sets out to tackle obesity and poor dietary health, it should develop and publish a consultation with industry on the issue of mandating maximum calories per portion. This consultation process must involve active engagement with SMEs and the catering sector.* (Paragraph 392)

41. Reformulation is an important part of overall efforts to drive healthier diets. The Government must maintain the pressure on food manufacturers to reformulate their products. The Government must recognise that the fact that Government-led reformulation programmes are required at all, points to wider and more serious failings in the food system as a whole. (Paragraph 397)

42. For voluntary programmes to be successful it is imperative that targets are transparently monitored and regularly reported on. Voluntary approaches may be successful if the Government sets out the right support to ensure industry stays engaged. (Paragraph 398)

43. *We recommend that all reformulation programmes, both voluntary and mandatory, should be subject to transparent and regular monitoring. Progress reports need to be carried out on a regular basis by the responsible body and should include details of the companies that have successfully made reductions in the levels of salt and sugar in their products, to aid industry-wide reformulation.* (Paragraph 399)

44. *We recommend that where voluntary approaches are adopted, the Government should make clear that if the industry does not respond comprehensively and swiftly then regulatory action will follow. Both the sugar and salt reduction programmes are unlikely to meet their stated targets. To ensure that necessary and significant public health improvements are actually achieved, the Government needs to face the reality of the situation and start to plan now for how further progress on reformulation might be delivered. The Government should set out now what mandatory action would look like, if sufficient progress is not made on the existing reformation programmes in the near future. Industry can then prepare. We ask that the Government does this by the end of 2020.* (Paragraph 400)

45. *Mandatory (fiscal) approaches can be highly successful, as evidenced by the Soft Drinks Industry Levy. As there is a proven mechanism for delivering successful reductions in harmful ingredients, in a way which has not had a significant detrimental impact on the industry, the Government must not delay in exploring*

the application of fiscal measures (such as further levies or changes to VAT) to other product categories where reformulation is not in line with Government guidance or targets. (Paragraph 401)

46. *We recommend that the Government stands by its commitment to review the Soft Drinks Industry Levy in 2020, and commits to extending the levy to other drinks containing added sugar, including sugary milk-based drinks. It should also conduct work to explore the impact of lowering the current sugar thresholds to encourage further reformulation. It should rapidly determine which other food products high in sugar could be subjected to a similar levy.* (Paragraph 402)

Chapter 6: Food and the environment

47. *We note that the Government's transition plan includes a commitment for largely unchanged funding for farmers until at least the end of the current Parliament. During this time, we urge the Government to undertake full and transparent consultation when considering the public goods that will be rewarded under the ELMS.* (Paragraph 426)

48. *The Government must ensure that every public good outlined in the Agriculture Bill is accompanied by a standardised framework to allow measurements and targets to be clear, consistent and easy to use.* (Paragraph 429)

49. *The Government must ensure that the ability to stipulate conditions for payments under the Environmental Land Management Scheme is both rigorously and fairly deployed. Where conditions are not met, enforcement action in the form of withholding payment must reliably follow.* (Paragraph 431)

50. In order to protect the natural environment and public health, there is a need for a fundamental shift in national consumption patterns towards a more plant-based, balanced diet in line with the recommendations of the Government's Eatwell Guide. (Paragraph 439)

51. *The Government's White Paper on the National Food Strategy must include a definitive outline of what constitutes a sustainable diet with regards to health, social and environmental impacts. It must be accompanied with a graded action plan and communications strategy to move towards this diet.* (Paragraph 440)

52. *The National Food Strategy should outline a comprehensive action plan to increase the demand for and consumption of fruit and vegetables.* (Paragraph 445)

53. *We recommend that Government should list Public Health as a 'Public Good' under Clause One of the Agriculture Bill. Measures eligible for financial assistance to improve public health should be focussed on (but not necessarily limited to) those activities which increase demand for fruits and vegetables.* (Paragraph 455)

54. *Food imports must be required to adhere to the same health, environmental and animal welfare standards as food produced in the UK. To fail to do so would make a mockery of our stated environmental values, and irrevocably undermine British producers. The Government must set out how it intends to ensure that current standards are maintained in future trade agreements, and what safeguards will be in place to guarantee this.* (Paragraph 469)

55. *The Government must provide sufficient and stable funding for research and development into agricultural technology and new ways of farming if sought after progress in increasing farming efficiency is to be made.* (Paragraph 478)

56. The policy environment for farming has often been insufficiently stable to enable individual farmers to make investment decisions on improving efficiency or on the use of agricultural technology. (Paragraph 482)

57. *The Government must ensure that the multi-annual financial assistance plans to be published under the Agriculture Bill are stable and not subject to substantive change: providing a sufficient amount of detail to allow farmers to make investment decisions.* (Paragraph 483)

58. *Any investment in or policy change related to farming productivity, including investment in agricultural technology or land use must take account of the imperatives to avoid undermining the ability to produce food in the future, and to protect biodiversity and animal welfare.* (Paragraph 488)

59. *Government must implement a mandatory reporting regime for adherence to clear and consistent sustainability and health metrics, as well as adherence to procurement standards. This should apply to all supermarkets, major food and drink manufacturers, public procurers and their contracted suppliers, and food outlets.* (Paragraph 493)

60. *Progress in tackling food waste will not be achieved without meaningful action from the retail sector. The Government should embark on a concerted effort to encourage sustainable purchasing behaviour from retailers. Consideration should be given to financial disincentives for retail or purchasing practices which lead to excessive pre-farm gate food waste.* (Paragraph 501)

Chapter 7: Governance, accountability and food policy

61. A national food strategy for England is long-overdue. It provides a much-needed opportunity to initiate a strategic, joined-up approach to food policy. (Paragraph 515)

62. *We recommend that the Government should remain committed to responding to the National Food Strategy review with a White Paper within six months of the review's publication. It should commit to action the review's recommendations on publication.* (Paragraph 516)

63. The development of a national food strategy provides an important opportunity to bring all policies related to the food system under an overarching aim to provide equitable access to healthy and sustainable diets. (Paragraph 536)

64. *In advance of the publication of the National Food Strategy review's final report, the Government should review levels of reporting on health and sustainability across the food system, to identify where gaps might exist in the current data sets that are available.* (Paragraph 537)

65. *The Government should develop and introduce a standardised set of mandatory reporting metrics aimed at monitoring the performance of Government departments and assessing progress made by the industry towards making healthy and sustainable food more accessible. The Government and the industry should be required to report on progress against those targets on a regular basis.* (Paragraph 539)

66. We see the establishment of a ministerial working group as essential to improving the level of coordination across Government on the interrelated issues of food insecurity, poor dietary health and food sustainability. This group should be chaired by a senior member of the Cabinet. (Paragraph 551)

67. *The Government must ensure that the appropriate Whitehall infrastructure is in place to ensure that the aims of the forthcoming National Food Strategy can be co-ordinated effectively across Government departments.* (Paragraph 552)

68. *Given the success of the salt reduction programme under the Food Standards Agency, if industry fails to make the necessary progress against Government reformulation targets, the Government should return the responsibility for nutrition, labelling and reformulation programmes to the FSA, and provide it with the appropriate resources.* (Paragraph 555)

69. Given the importance of food policy and its overriding impact across a range of sectors, we feel that there is a compelling argument for independent oversight of all aspects of food policy in England. As the National Food Strategy is a key opportunity for food policy to be embedded into other related policy areas, its recommendations should not be enacted by DEFRA alone, and some form of independent oversight is required to review the future implementation of its recommendations. The Government, however, does not appear to have given consideration as to how this might be achieved. (Paragraph 562)

70. *We recommend the establishment of an independent body, analogous to the Committee on Climate Change, with responsibility for strategic oversight of the implementation of the National Food Strategy. This should include the monitoring and reporting on progress made against the health and sustainability targets outlined in paragraph 538. This independent body should have the power to advise the Government and report to Parliament on progress.* (Paragraph 563)

APPENDIX 1: LIST OF MEMBERS AND DECLARATIONS OF INTEREST

Members

Lord Krebs (Chair)
Baroness Boycott
The Earl of Caithness
Lord Empey
Baroness Janke
Baroness Osamor
Baroness Parminter
Baroness Ritchie
Baroness Sanderson
Baroness Sater
Lord Whitty

Declarations of interest

Baroness Boycott
Chair, Veg Power
Co-Chair, Feeding Britain
Trustee, Food Foundation
Trustee, StreetSmar
Patron, Sustain
Advisory panel, National Food Strategy
President, British Guild of Agricultural Journalists
Earl of Caithness
No relevant interests declared
Lord Empey OBE
No relevant interests declared
Baroness Janke
No relevant interests declared
Lord Krebs
Advisor to Marks & Spencer Plc
Chair, LEAP, programme advisory board
Advisor, Ajinomoto Co Inc
Trustee, Nuffield Foundation
Baroness Osamor
No relevant interests declared
Baroness Parminter
No relevant interests declared
Baroness Ritchie of Downpatrick
No relevant interests declared
Baroness Sanderson of Welton
No relevant interests declared
Baroness Sater
Patron, StreetGames
Lord Whitty
Vice President, Chartered Trading Standards Institute
Vice President, Local Government Association

A full list of Members' interests can be found in the Register of Lords Interests:
https://www.parliament.uk/mps-lords-and-offices/standards-and-financial-interests/house-of-lords-commissioner-for-standards-/register-of-lords-interests/

Specialist Adviser - Professor Martin White

Research leader of food systems and population health, MRC Epidemiology Unit, University of Cambridge.

Director of Public Health Research Programme, National Institute of Health Research (weekly Secondment).

Specialist Adviser- Professor Elizabeth Robinson

Head of Applied Economics and Marketing, School of Agriculture, Policy and Development, University of Reading

APPENDIX 2: LIST OF WITNESSES

Evidence is published online at: https://committees.parliament.uk/committee/408/food-poverty-health-and-environment-committee/

It is available for inspection at the Parliamentary Archives (020 7219 3074). Evidence received by the Committee is listed below in chronological order of oral evidence session and in alphabetical order. Those witnesses marked with ⋆⋆ gave both oral evidence and written evidence. Those marked with ⋆ gave oral evidence and did not submit any written evidence. All other witnesses submitted written evidence only.

Oral evidence in chronological order

⋆⋆	Anna Taylor, Executive Director, The Food Foundation	QQ 1–8
⋆	Professor Tim Lang, Professor of Food Policy, City University of London	
⋆	Professor Tim Key, Professor of Epidemiology & Deputy Director, Cancer Epidemiology Unit, Nuffield Department of Population Health	QQ 9–16
⋆⋆	Dr Christina Vogel, Principal Research Fellow in Public Health Nutrition at the University of Southampton	
⋆	George Butterworth, Senior Policy Manager at Cancer Research UK	
⋆⋆	Jenny Oldroyd, Deputy Director Obesity, Food and Nutrition, Department of Health and Social Care	QQ 17–29
⋆⋆	Julia Gault, Deputy Director Labour Market, Families & Disadvantage, Department for Work and Pensions	
⋆⋆	Sarah Lewis, Director System Leadership and Strategy (Early years and schools) Department for Education	
⋆⋆	Alison Ismail, Acting Director for Agri-Food Chain Directorate, Department for Environment, Food and Rural Affairs	
⋆⋆	Helen Barnard, Deputy Director of Policy and Partnerships, Joseph Rowntree Foundation	QQ 30–36
⋆	Garry Lemon, Director of Policy, External Affairs and Research, The Trussell Trust	
⋆⋆	Alison Garnham, Chief Executive, Child Poverty Action Group (CPAG)	
⋆	Professor Greta Defeyter, Professor of Psychology at University of Northumbria	QQ 37–45
⋆	Dr Mary Bousted, Joint General-Secretary of the National Education Union	
⋆⋆	Alysa Remtulla, Head of Policy and Campaigns, Magic Breakfast	

★	Tom Andrews, Programme Manager, Sustainable Food Cities	QQ 46–52
★	Steve Butterworth, CEO, Neighbourly	
★	Alex Holt, Programme Lead, Food Active	
★★	Nicky Dennison, Public Health Specialist, Blackpool City Council	QQ 53–60
★	Dr Katie Cuming, Public Health Consultant, Brighton and Hove City Council	
★	Shirley Cramer, Chief Executive, Royal Society for Public Health	QQ 61–66
★	Dr Louise Marshall, Senior Public Health Fellow, Health Foundation	
★	Professor Susan Jebb, Professor of diet and population health, University of Oxford	
★	Susan Lloyd, Executive Lead for Policy at the Faculty of Public Health	
★★	Mhairi Brown, Policy and Public Affairs Coordinator, Consensus Action on Salt, Sugar and Health	QQ 67–73
★★	Dr Hilda Mulrooney, Associate Professor in Nutrition, Obesity Group of the British Dietetic Association	
★★	Kate Halliwell, Head of Diet and Health Policy, Food and Drink Federation	
★	Dr Tara Garnett, Food Climate Research Network Leader, University of Oxford	QQ 74–79
★	Professor Andrew Balmford, Professor of Conservation Science, University of Cambridge	
★	Dr Adrian Morley, Manchester Metropolitan University	
★★	Kath Dalmeny, Chief Executive of Sustain	QQ 80–87
★	Professor Sir Charles Godfray, Director of Oxford Martin Programme on the Future of Food	
★	Professor Tim Benton, Director, Energy, Environment and Resources Programme, Chatham House	
★	Philip Hambling, Head of Food and Farming Policy, National Farmers' Union	QQ 88–93
★★	Rob Percival, Head of Policy (food and health), Soil Association	
★★	Judith Batchelar OBE, Director of Sainsbury's Brand, Sainsbury's	QQ 94–99
★	Andrew Opie, Director of Food and Sustainability, British Retail Consortium	
★	Henry Dimbleby, National Food Strategy Review Lead	QQ 100–105

★	Mark Laurie, Director at Nationwide Caterers Association	QQ 106–111
★★	David Morris, Deputy Head of Food, Agriculture, Fisheries and Rural Strategy at Welsh Government	QQ 112–118
★	George Burgess, Head of Food and Drink at Scottish Government	
★	Donald Macaskill, Chief Executive at Scottish Care, Scottish Food Coalition	
★★	Jo Churchill MP, Parliamentary Under Secretary of State (Minister for Prevention, Public Health and Primary Care) at the Department of Health and Social Care	QQ 119–130
★	Will Quince MP, Parliamentary Under-Secretary in the Department for Work and Pensions	

Alphabetical list of all witnesses

	A Menu for Change	ZFP0081
★	Tom Andrews, Programme Manager, Sustainable Food Cities	
	Association of Convenience Stores (ACS)	ZFP0050
★	Professor Andrew Balmford, University of Cambridge	
★★	Helen Barnard, Deputy Director of Policy and Partnerships, Joseph Rowntree Foundation (QQ 30–36)	ZFP0099
	Bags of Taste Limited	ZFP0029
★★	Judith Batchelar OBE, Director of Sainsbury's Brand, Sainsbury's (QQ 94–99)	ZFP0034 ZFP0091
	Dr Dave Beck, The University of Salford	ZFP0001
★	Professor Tim Benton, Director, Energy, Environment and Resources Programme, Chatham House	
	Birmingham Food Council CIC	ZFP0057
	Dr. Megan Blake	ZFP0030
★	Dr Mary Bousted, Joint General-Secretary of the National Education Union	
	Dr Mhairi Bowe, Dr Juliet Wakefield, and Nottingham Civic Exchange (QQ 67–73)	ZFP0078
	Anthony Bown	ZFP0037
	Miss Hannah Bown	ZFP0042
	Hannah French, Bristol City Council	ZFP0047
	British Growers Association	ZFP0090
★★	Mhairi Brown, Policy and Public Affairs Coordinator, Consensus Action on Salt, Sugar and Health	ZFP0053

★	George Burgess, Head of Food and Drink at Scottish Government	
★★	George Butterworth, Senior Policy Manager at Cancer Research UK	ZFP0043
★★	Steve Butterworth, CEO, Neighbourly	ZFP0066
	Dr Koldo Casla, Institute of Health and Society, Newcastle University	ZFP0012
	Central England Co-operative	ZFP0060
	Centre for Diet and Activity Research	ZFP0038
	Church Action on Poverty, Food Foundation, Nourish Scotland, Oxfam and Sustain: the alliance for food and farming	ZFP0031
★★	Jo Churchill MP, Parliamentary Under Secretary of State (Minister for Prevention, Public Health and Primary Care) at the Department of Health and Social Care (QQ 119–130)	ZFP0097 ZFP0097
	Mrs Wilfrid Crawford	ZFP0063
	City Harvest	ZFP0055
	Dr Frances Cossar (co-authored with Prof. Dominic Moran, Prof. Mark Rounsevell, Dr Peter Alexander, and Dr Roslyn Henry), University of Edinburgh	ZFP0005
★	Shirley Cramer, Royal Society for Public Health	
	The Crop Protection Association UK Ltd.	ZFP0021
★	Dr Katie Cuming, Public Health Consultant, Brighton and Hove City Council	
	Exeter Foodbank	ZFP0059
★★	Kath Dalmeny, Chief Executive of Sustain: The Alliance for Better Food and Farming (QQ 80–87)	ZFP0071
★	Professor Greta Defeyter, Professor of Psychology at University of Northumbria	
★★	Nicky Dennison, Public Health Specialist, Blackpool City Council (QQ 53–60)	ZFP0036
★★	Department for Education	ZFP0098
★★	Department for Environment, Food and Rural Affairs	ZFP0096 ZFP0098
★★	Department of Health and Social Care	ZFP0097 ZFP0098
★★	Department for Work and Pensions	ZFP0098
★	Henry Dimbleby, National Food Strategy Review Lead	
	Professor Louise Dye, University of Leeds, Cross Faculty Food Theme	ZFP0058

	Faculty of Dental Surgery at the Royal College of Surgeons	ZFP0010
	FareShare	ZFP0085 ZFP0095
	Fareshare Yorkshire	ZFP0103
	Feedtest	ZFP0086
	Helen Crawley and Victoria Sibson, First Steps Nutrition Trust	ZFP0044
	Food Ethics Council	ZFP0054
★★	The Food Foundation, London School of Hygiene and Tropical Medicine and Sustainable and Healthy Food Systems (SHEFS)	ZFP0073
	Foodshare Maidenhead	ZFP0013
	Foodwise Leeds	ZFP0102
	Dr Sinéad Furey	ZFP0019
★★	Alison Garnham, Chief Executive Child Poverty Action Group (QQ 30–36)	ZFP0100
★	Dr Tara Garnett, Food Climate Research Network Leader, University of Oxford	
	Dr Kayleigh Garthwaite	ZFP0022
★★	Julia Gault, Deputy Director Labour Market, Families & Disadvantage, Department for Work and Pensions (QQ 17–29)	ZFP0098
	Professor Sir Charles Godfray, Director of Oxford Martin Programme on the Future of Food	
	Greater Manchester Poverty Action	ZFP0049
	Royal Borough of Greenwich Council, Corporate Services	ZFP0015
★★	Kate Halliwell, Head of Diet and Health Policy, Food and Drink Federation (QQ 67–73)	ZFP0009 ZFP0094
★	Philip Hambling, Head of Food and Farming Policy, National Farmers' Union	
	John Harding	ZFP0028
	Professor Dominic Harrison, Director of Public Health and Wellbeing, Blackburn with Darwen Council and Emma Savage, Specialty Registrar in Public Health	ZFP0027
	Health Action Campaign	ZFP0046
	Kevin Higgins, Advice NI	ZFP0020
	Hinckley Area Foodbank	ZFP0004
★★	HM Government	ZFP0079 ZFP0098

⋆	Alex Holt, Programme Lead, Food Active	
	Valerie Hutson	ZFP0072
⋆⋆	Alison Ismail, Acting Director for Agri-Food Chain Directorate, Department for Environment, Food and Rural Affairs (QQ 17–29)	ZFP0098 ZFP0096
	Ian. E. Ivory	ZFP0088
⋆	Professor Susan Jebb, Professor of diet and population health, University of Oxford	
⋆	Professor Tim Key, Professor of Epidemiology & Deputy Director, Cancer Epidemiology Unit, Nuffield Department of Population Health	
	LACA	ZFP0048
	Labour Hunger Campaign	ZFP0052
	Lady Iveta Kurpniece	ZFP0011
	Dr Hannah Lambie-Mumford, Lecturer, Department of Politics and International Relations at University of Sheffield	ZFP0041
⋆	Professor Tim Lang, Professor of Food Policy, City University of London	
⋆	Mark Laurie, Director at Nationwide Caterers Association	
	Leeds City Council	ZFP0101
	Leeds Community Foundation	ZFP0104
	Leeds Food Aid Network	ZFP0018 ZFP0105
⋆	Garry Lemon, Director of Policy, External Affairs and Research, The Trussell Trust	
⋆⋆	Sarah Lewis, Director System Leadership and Strategy (Early years and schools) Department for Education (QQ 17–29)	ZFP0098
⋆	Susan Lloyd, Executive Lead for Policy at the Faculty of Public Health	
	Dr Rachel Loopstra and Dr Aaron Reeves	ZFP0065
	Martin Lovegrove	ZFP0003
	Dr Nadina Luca	ZFP0032
⋆	Donald Macaskill, Chief Executive at Scottish Care, Scottish Food Coalition	
⋆	Dr Louise Marshall, Senior Public Health Fellow, Health Foundation	
	Professor Jon May, Dr Andrew Williams, Professor Paul Cloke, Dr Liev Cherry	ZFP0082

★	Dr Adrian Morley, Manchester Metropolitan University	
★★	David Morris, Deputy Head of Food, Agriculture, Fisheries and Rural Strategy at Welsh Government (QQ 112–118)	ZFP0092
★★	Dr Hilda Mulrooney, Associate Professor in Nutrition, Obesity Group of the British Dietetic Association (QQ 67–73)	ZFP0035
	Nature Friendly Farming Network (NFFN)	ZFP0089
	Nestlé UK&I	ZFP0051
	Nourish Scotland	ZFP0064
	Nuffield Council on Bioethics	ZFP0045
★★	Jenny Oldroyd, Deputy Director Obesity, Food and Nutrition, Department of Health and Social Care (QQ 17–29)	ZFP0098 ZFP0097
	Jamie Oliver	ZFP0075
	The Office for National Statistics (ONS)	ZFP0087
★	Andrew Opie, Director of Food and Sustainability, British Retail Consortium	
	Dr Ruth Patrick, University of York, Department of Social Policy and Social Work	ZFP0093
	People First Keighley & Craven	ZFP0083
★★	Rob Percival, Head of Policy (food and health), Soil Association (QQ 88–93)	ZFP0016
	Dr Clare Pettinger assisted by members of the Food Plymouth partnership	ZFP0033
	Project 17	ZFP0008
★	Will Quince MP, Parliamentary Under-Secretary in the Department for Work and Pensions	ZFP0098
★★	Alysa Remtulla, Head of Policy and Campaigns, Magic Breakfast (QQ 37–45)	ZFP0076
	Doctor Christian Reynolds	ZFP0077
	Dr Manu Savani	ZFP0070
	Dr Rebecca Sandover	ZFP0056
	The Institute of Developmental Sciences, Faculty of Medicine, University of Southampton, MRC Lifecourse Epidemiology Unit and the NIHR Biomedical Research Centre, University of Southampton and University Hospital Southampton NHS Foundation Trust	ZFP0080
	South Wales Food Poverty Alliance (SWFPA)	ZFP0084

	Cllr Evelyn Akoto, Cabinet Member for Community Safety and Public Health, Southwark Council	ZFP0024
	Susan Hedley	ZFP0069
	Sustainable Food Trust	ZFP0007
	Professor Isabelle Szmigin, University of Birmingham	ZFP0017
★★	Anna Taylor, Executive Director, The Food Foundation (QQ 1–8)	ZFP0073
	Transition Town Wirksworth	ZFP0067
	Elif Emma True	ZFP0074
	Laura Holland, Venner Finland	ZFP0006
	Visformatics	ZFP0061
★★	Dr Christina Vogel, Principal Research Fellow in Public Health Nutrition at the University of Southampton	ZFP0080
	Martin Yarnit, Churchill Fellow	ZFP0002
	UK Research and Innovation	ZFP0039
	University of York, IKnowFood Programme	ZFP0040

APPENDIX 3: CALL FOR EVIDENCE

Call for evidence

The Select Committee on food, poverty, health and the environment was appointed by the House of Lords on 13 June 2019 to "consider the links between inequality, public health and food sustainability". It has to report by 31 March 2020. A central question for this inquiry is how to make a healthy, sustainable diet accessible and affordable for everyone.

Questions

1. What are the key causes of food insecurity in the UK?[710] Can you outline any significant trends in food insecurity in the UK? To what extent (and why) have these challenges persisted over a number of years?

2. What are some of the key ways in which diet (including food insecurity) impacts on public health? Has sufficient progress been made on tackling childhood obesity and, if not, why not?

3. How accessible is healthy food? What factors or barriers affect people's ability to consume a healthy diet? Do these factors affect populations living in rural and urban areas differently?

4. What role can local authorities play in promoting healthy eating in their local populations, especially among children and young people, and those on lower incomes? How effectively are local authorities able to fulfil their responsibilities to improve the health of people living in their areas? Are you aware of any existing local authority or education initiatives that have been particularly successful (for example, schemes around holiday hunger, providing information on healthy eating, or supporting access to sport and exercise)?

5. What can be learnt from food banks and other charitable responses to hunger? What role should they play?

6. What impact do food production processes (including product formulation, portion size, packaging and labelling) have on consumers dietary choices and does this differ across income groups?

7. What impact do food outlets (including supermarkets, delivery services, or fast food outlets) have on the average UK diet? How important are factors such as advertising, packaging, or product placement in influencing consumer choice, particularly for those in lower income groups?

8. Do you have any comment to make on how the food industry might be encouraged to do more to support or promote healthy and sustainable diets? Is Government regulation an effective driver of change in this respect?

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710 There is no universally accepted definition of food insecurity, but the most commonly used is: "limited or uncertain availability of nutritionally adequate and safe foods or limited or uncertain ability to acquire acceptable foods in socially acceptable ways (e.g. without resorting to emergency food supplies, scavenging, stealing or other coping strategies)." (The Food Foundation, *Too Poor to Eat: Food insecurity in the UK,* (May 2016): https://foodfoundation.org.uk/wp-content/uploads/2016/07/FoodInsecurityBriefing-May-2016-FINAL.pdf. This definition was also used for the UK's 2007 Low Income Diet and Nutrition Survey.)

9.   To what extent is it possible for the UK to be self-sufficient in producing healthy, affordable food that supports good population health, in a way that is also environmentally sustainable?

10. Can efforts to improve food production sustainability simultaneously offer solutions to improving food insecurity and dietary health in the UK?

11. How effective are any current measures operated or assisted by Government, local authorities, or others to minimise food waste? What further action is required to minimise food waste?

12. A Public Health England report has concluded that "considerable and largely unprecedented" dietary shifts are required to meet Government guidance on healthy diets.[711] What policy approaches (for example, fiscal or regulatory measures, voluntary guidelines, or attempts to change individual or population behaviour through information and education) would most effectively enable this? What role could public procurement play in improving dietary behaviours?

13. Has sufficient research been conducted to provide a robust analysis of the links between poverty, food insecurity, health inequalities and the sustainability of food production? How well is existing research on the impact of existing food policy used to inform decision making?

14. What can the UK learn from food policy in other countries? Are there examples of strategies which have improved access and affordability of healthy, sustainable food across income groups?

15. Are there any additional changes at a national policy level that would help to ensure efforts to improve food insecurity and poor diet, and its impact on public health and the environment, are effectively coordinated, implemented and monitored?

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711 Scarborough, P, et al. Eatwell Guide: modelling the dietary and cost implications of incorporating new sugar and fibre guidelines, 2016, https://bmjopen.bmj.com/content/6/12/e013182

APPENDIX 4: ACRONYMS AND ABBREVIATIONS

AHC	After housing costs
BAME	Black, Asian and Minority Ethnic
BHC	Before Housing costs
CAP	EU's Common Agricultural Policy
CPAG	Child Poverty Action Group
DEFRA	Department for Environment, Food and Rural Affairs
DFID	Department for International Development
DHSC	Department of Health and Social Care
DWP	Department for Work and Pensions
EFB	Exeter Foodbank
ELMS	Environmental Land Management Scheme
FAO	Food and Agriculture Organisation
FRS	Family Resources Survey
FSA	Food Standards Agency
FSM	Free School Meals
GBSF	Government Buying Standards for Food and Catering Services
GHG	Greenhouse gas
GVA	Gross Value Added
HFSS	High in fat, salt or sugar
IFS	Institute for Fiscal Studies
JRF	Joseph Rowntree Foundation
LACA	The Local Authority Caterers Association
LSHTM	London School of Hygiene and Tropical Medicine
NEU	National Education Union
NIHR	National Institute for Health Research
NFS	National Food Strategy
NGO	Non-Governmental Organisation
NHS	National Health Service
NRPF	No recourse to public funds
NSBP	Government National School Breakfast Programme
PHE	Public Health England
R&D	Research and development
SACN	Scientific Advisory Committee on Nutrition
SDIL	Soft Drinks Industry Levy
SFT	Sustainable Food Trust

SHEFS   Sustainable and Healthy Food Systems
SMC   Social Metrics Commission
SMEs   Small and Medium enterprises
UC   Universal Credit
UIFSM   Universal Infant Free School Meals
UNICEF   United Nations Children's Fund
WRAP   Waste and Resources Action Programme

APPENDIX 5: EXPERIENCES OF FOOD INSECURITY

Introduction

1.   This note provides a summary of a series of telephone calls with people who have experienced poverty and food insecurity. It contains a report of each conversation.

Background

2.   On 17 March 2020, the Committee was due to hold an informal engagement session with people who have experienced food insecurity. Food Power, an initiative run by Sustain and Church Action on Poverty had helped to organise the event. Due to COVID-19 crisis, this event had to be cancelled.

3.   In place of the session, on Friday 22 May and Wednesday 25 May 2020, the secretariat undertook a series of phone calls with the individuals who had planned to attend the original event. The secretariat was put in touch with these witnesses by Simon Shaw, Programme Manager at Sustain, and Ben Pearson, Empowerment Programme Officer at Church Action on Poverty, who identified and contacted witnesses. The Clerk and the Policy Analyst of the Committee led the phone calls, asking a set of questions that had been circulated to the individuals beforehand, with the Committee Assistant of the Committee taking notes. Ben Pearson also took part on the calls and occasionally asked follow up questions (the note indicates where this occurred).

4.   All participants were informed of the purpose of the phone calls and gave consent for their testimony and names to be published. The views outlined in this note are those of the individuals we spoke to.

5.   The team based each phone call around the following questions:

    (a)   How do you choose what to eat? What is most important?

    (b)   What does a healthy diet mean to you? Do any difficulties get in the way of that? What would make it easier?

    (c)   How easy is it for you to cook? What would make it easier for you to cook at home?

    (d)   What does food poverty look like for you or people in your community? What effect does it have on daily life?

    (e)   What effect has coronavirus had on your diet or ability to access food? What effect has it had in your community?

    (f)   Do you have any suggestions for what government, councils or other public services could do to help?

    (g)   The Committee will be making suggestions to enable more people to access a healthy diet. Is there anything you think they should understand that they may not know?

Session 1: Penny, Newcastle

Q. How do you choose what to eat? What is most important? What does a healthy diet mean to you? Do any difficulties get in the way of that? What would make it easier?

- Penny reported that price was the overriding factor in choosing food and stated: "It is what you can afford."

- Penny referred to supermarkets reducing their prices at certain times and said that she would choose from this section, looking at the reduced food to plan what meals could be made from them.

- When asked about accessing healthy foods, Penny referred to price being the main factor.

- She wondered whether people knew about healthy food and how to prepare it.

- Penny told us that she would buy some kinds of food (for example, chicken nuggets and chips) because she could be confident children would eat it, as opposed to vegetables which would not be eaten, wasting money.

- She believed that healthy food costs more than other food.

Q. How easy is it for you to cook? What would make it easier for you to cook at home?

Q. What does food poverty look like for you or people in your community? What effect does it have on daily life?

Penny told us that:

- The amount of energy on the meter can limit what you cook: soup only requires one pan, whereas a full meal requires more energy.

- Equipment is important: some people are only able to eat things that can be heated in the microwave

- Food poverty has a big effect on daily life.

- There is a limited choice in the content of food parcels at food banks—you get what you are given. You can also get given things in a food parcel that you don't have equipment to cook

- A lot of dietary requirements are not always considered in food parcels. Penny told us that she has a dairy intolerance and cannot drink the long-life milk in the food parcels

- Penny questioned the point of giving tins to homeless people—to eat tins you need a tin opener, a pan, and a hob.

- Penny suggested that food can be more expensive if you have an intolerance. She estimated that non-dairy milk is 40p more expensive than cows milk.

Q. What effect has coronavirus had on your diet or ability to access food? What effect has it had in your community?

- Penny has two key workers in her home.

- She felt that delivery slots are not working and that there didn't seem to be a priority for NHS staff getting deliveries, in her experience.

- Penny told us that printing vouchers is a barrier for accessing food, there is nothing in place for those who cannot do so.

- Attending schools to collect meal vouchers is an added inconvenience

- She said that stockpiling had reduced the range of products available in the shops. She believed that people on higher incomes have bought lots during the pandemic, but waste more, so lots will spoil.

- Penny has extra food in her house and will give it to people on her estate who are struggling: people will ask others in the community for help rather than accessing help elsewhere. She told us: "It is a pride thing too, just because you have no money does not mean you have no pride".

Q. Do you have any suggestions for what government, councils or other public services could do to help?

- Penny said that the Government should look at Universal Basic Income, so everyone has same amount whether working or not. It would give enough money to buy the food needed to stay alive. Penny praised nearby councils for being connected: she believes they aim for people to be thought of as people and not just a statistic.

- Penny said that Universal Credit is all online but that many people are not tech-savvy or cannot afford to be. She pointed out that public WiFi is unavailable at the moment, but if you don't have access to WiFi you cannot do the job searches required by Universal Credit

- Penny mentioned "next day shops" where you can bulk buy food about to go out of date. Includes McDonalds and Greggs.

- Penny said she thought education on cooking and budgeting is important. Schools need to: "Teach kids how to cook, especially on a budget"

- She said that Government funding cuts have diminished general support, including citizens advice, which was great but has had cuts. Council used to run drop-ins and tea sessions. She said that more support should be available via phone for people who do not know how to fill in forms.

- Penny said that charities are taking on the bulk of responsibility over the councils: "Charitable people have come in and propped it up, they've had to take on more and more". Penny said her local food bank closed before lockdown due to the age of volunteers—leaving a provision gap of around a month.

- When Ben Pearson asked about the impact of the COVID-19 outbreak on her mental health, Penny said lockdown has had a big impact on mental health. Her interactions with people have changed. She gets a phone call from her mental health nurse every 6 weeks and her operations are delayed until possibly next year.

- When asked if lockdown impacts on her dietary choices, Penny said: "Yes! If you haven't got it in, you aren't going to risk going out and getting it."

- Penny said that it is sometimes cheaper for her to buy a takeaway than to cook. She said that the local chippy can feed three people for a fiver: cheaper than in shops, especially when accounting for energy usage to prepare food. She said that takeaway options are very unhealthy, fried and processed food, full of fats and grease. She said that as long as kids are not crying because they're hungry–fast food is what you are going to do.

- Penny said that schools can give children fruit and vegetables, because they can afford waste: but you can't do that, you will give your kids food they are going to eat

- Penny told us that three quarters of people on her estate use pre-payment meters which are more expensive than paying by direct debit.

- Penny said that more people need to speak out. She believed that there has to be more people like this who say: "I think this is wrong, we need the support". People who live like this shouldn't have to live like this. She believed that people should be shown that they can have a voice and can speak out, they can be heard, and that this will show the Government that there are more people in poverty than in wealth

Session 2: Tia, Blackburn with Darwen

Q. How do you choose what to eat? What is most important?

Q. What does a healthy diet mean to you? Do any difficulties get in the way of that? What would make it easier?

Q. How easy is it for you to cook? What would make it easier for you to cook at home?

- Tia told us that she distinguished between good weeks and bad weeks. If it's a good week, she will try to get ingredients to make a whole meal such as curry (which is good because there will be leftovers for another meal). On a bad week, she will have frozen food as it is a meal all in one, making it cheaper overall than making a homemade meal. She said that if you buy a frozen lasagne you can wait to cook it any night of the week but using fresh ingredients a fresh one needs cooking within days so there is less flexibility.

- Tia has had free school meals. She was given £2. A hot meal is £1.50 so she had to get the selected meals: she could not choose to add or mix the elements of the meal. Tia told us that there are separate lines and tables for free school meals and lunchboxes and different tables, so she feels like the stigma starts very early on.

- Tia told us that if you have a choice of drink from the shops, a smoothie is £4 and coke is £1 so she thinks that healthy food is more expensive than cheap food.

- Tia told us that school didn't start until 9am and that you could get a free piece of toast and tea at 8.30am but that lots of people didn't come in early for a piece of toast.

- Tia told us that to get free school meal vouchers during lockdown, children have been asked to wear their school uniform and have to walk across town.

- Tia told us that she feels lots of people in her community are struggling with food insecurity, but they don't want to talk about it because there is such a stigma.

- Tia told us that there are informal support networks for those who don't have family and that there is a Facebook group to get support. Otherwise friends get food from friends to avoid being judged by anyone else.

Q. What effect has coronavirus had on your diet or ability to access food? What effect has it had in your community?

- Tia told us that at the start there was panic buying before her mum had been paid, so there were limits on how much they could get. At first, they couldn't get pasta. She said that usually her grandparents will provide lifts to get to the shop. During lockdown, this couldn't happen, so Tia's mother now goes out more often and does more trips to carry everything she will need for the next few days.

- In the area where Tia lives there is one tiny ASDA, one Iceland and a giant Sainsburys which she says is too expensive. Tia said that because the ASDA is so small, people have to go to multiple shops to get what they need: there are not as many deals or reduced items.

- Tia believed that there should be more awareness of the people who are struggling: not everyone is experiencing the same problems.

- Tia explained some problems at school related to poverty and food insecurity. Teachers might give detentions which take over half of lunchtime, and lunch might be the first meal of the day for some children. She also provided the example of a bake sale for a charity at school, where not everyone can realistically donate. Tia said she felt like teachers were "picking on" students who come in in their trainers, haven't eaten and are misbehaving, rather than wondering what else is going on. She said she felt like unhealthy food options also affect behaviour and energy levels.

- Tia had cooking lessons in secondary school but she said that they are not taught how to budget for the ingredients. She said that you are expected to bring in the ingredients, and that students get a detention if you don't have the ingredients, but that their parents might not have been paid yet. Tia also said that non-uniform days at school are £1 each. Tia is one of three siblings, so her family has to spend £3.

Q. Do you have any suggestions for what government, councils or other public services could do to help?

Q. The Committee will be making suggestions to enable more people to access a healthy diet. Is there anything you think they should understand that they may not know?

- Ben Pearson asked Tia if the Government should do something differently to promote a healthy diet to make it more in line with people's experiences. Tia said that she feels the Government creates a stigma, suggesting that everyone can eat a healthy diet, but they can't: it is more expensive.

- Tia told us that people are shown the negatives of the food they eat, for example, the video of what goes into a chicken nugget. She said she feels that this does not address the problem that a chicken nugget may be all their parents can afford.

- Tia said she felt like the Government talk about all the options people have but don't talk about how they are going to do it or carry it out.

Session 3: Monica, Oxford

Q. How do you choose what to eat? What is most important?

- Monica told us that it is what is the cheapest and what is available at the time—things that are easy to cook. She said that she thinks fresh food is more expensive so choosing what is cheap, including frozen, despite knowing what is in it.

- Monica has to eat healthily because she has IBS, but has to really budget to make do. When asked if anything other than price would make it easier to choose the healthy food, Monica said no, only price. She said every penny has to be budgeted on benefits.

Q. What does a healthy diet mean to you? Do any difficulties get in the way of that? What would make it easier?

Q. How easy is it for you to cook? What would make it easier for you to cook at home?

- Monica told us that not having cooking equipment gets in the way of cooking—people make do or use a microwave. The right equipment would make it easier to cook food, and a lot of people haven't got access to a cooker or cooking equipment at all.

- Monica said, when cooking, you have to make sure you have enough gas and electric on the meter asking yourself if that is going to finish this meal. Then it is a choice putting gas on with your last £10 or buy food with your last £10. She said it can be very difficult at times.

Q. What does food poverty look like for you or people in your community? What effect does it have on daily life?

- Monica works with people in extreme food poverty, and at the moment she is seeing a lot of in-work poverty in Oxford, even more so since COVID because people have lost their jobs, having to rely on foodbanks.

- When asked by Ben Pearson if in-work poverty is overlooked, Monica said that people assume people in-work are ok, but some people are working three or four jobs to keep a roof over their heads and food on the table. This gets over-looked because they are working.

- Monica had previously been homeless. She said that when she had been homeless, the idea of healthy food was not a priority compared to getting enough food. She had known what a healthy diet was but couldn't access the facilities to be able to cook a healthy meal. Ben Pearson asked about the impact of hunger on Monica's mental health, she said that hunger does impact on your mental health and on your tiredness, as well as on behaviour.

- Monica said that some of the people she works with don't have a cooker or a microwave just a single hob for beans and toast.

Q. What effect has coronavirus had on your diet or ability to access food? What effect has it had in your community?

- Monica said that lots of children are going without a meal, as the only meal of the day was at school. These children might just have a sandwich and a packet of crisps.

- Monica works for a charity which has delivered 500 food parcels to the vulnerably housed during April. When asked if there was support for this charity from the Government to provide food during lockdown, Monica said that there was hardly anything, and that charities and groups have formed to fill the gap: this relies on the goodwill of the people of Oxford to come together.

- When asked about the Free School Meal vouchers during coronavirus, Monica said that the vouchers have not been accessible for a lot of people, and that is what they rely on to purchase food. She said that the facilitator was struggling to keep up with demand. The vouchers had taken weeks to come through, then, when received, they often do not work in the shop. Families then go back to the issuer, and the vouchers get resent. She said that some schools just made up packs and delivered them to students.

- Monica told us that many adults are going without food because they would rather their children eat. She thinks that this is more common now during COVID-19 lockdown. She said that more people have been pushed to ask for help, which they do not usually do because of shame and stigma.

- She spoke of some difficulties in applying for Universal Credit. She spoke about job centre staff as being hit and miss with whether they are helpful or truthful. She said Universal credit leaves very little money to buy healthy food after bills. Many of her clients buy food and then don't pay bills, getting themselves into arrears.

Q. Do you have any suggestions for what government, councils or other public services could do to help?

Q. The Committee will be making suggestions to enable more people to access a healthy diet. Is there anything you think they should understand that they may not know?

- Monica said that the Government should look at how little people get on benefits and that it is not much once you've paid your bills.

- When asked about budgeting, Monica said that the job centres provide very little help. There is a programme where job centres can "money manage", taking charge of the benefits received, paying bills, and paying small amounts daily to recipients, which works in some scenarios but not in others. Monica said that UC is a difficult system to navigate.

- Monica suggested more provision for breakfast clubs and afterschool clubs. She said children go without breakfast and have to wait until lunch to get food. After school clubs have been cancelled because of cuts to funding.

Session 4: Cath, Newcastle

Q. How do you choose what to eat? What is most important?

- When asked about priorities for food choices, Cath said that "full tummies are at the top every time."

- Cath said that the 'yellow sticker' reduction aisle is important. Cath waits for items to be reduced by supermarket staff and doesn't know anyone who doesn't do this. She buys minced meat and chicken as it can be used for multiple dishes - people on a budget will have left over meat for another dish.

Q. What does a healthy diet mean to you? Do any difficulties get in the way of that? What would make it easier?

- Cath said that she buys frozen vegetables as they are a lot cheaper than fresh. This affects the variety of what one eats.

- When asked about food labelling, Cath stated that labels were not important: fortnightly money arrives, bills are paid, then shopping has to be as economic as possible. She said: "You just want to make sure tummies are full - you don't care about labels".

- When asked about the logistics of shopping, Cath said that you might learn times and places for reductions: that knowledge is shared with others in the community. Cath does not drive, so she cannot do a full fortnightly shop.

Q. How easy is it for you to cook? What would make it easier for you to cook at home?

- Cath told us that equipment in social housing can mean that cooking takes much longer. When asked by Ben Pearson about energy costs, Cath stated that she replaces cooked meals with sandwiches o-r porridge with water.

- Time was also an issue. She questioned why she would make her own pizza when pizza can be bought for £1 and 15 minutes in the oven.

Q. What does food poverty look like for you or people in your community? What effect does it have on daily life?

- Cath said that in the last few days before money arrives, she might only eat one meal a day.

- Cath said that she thinks many people may not know they are in food poverty. Taking food from donations, projects giving out food, and people sharing food is very common and normal, it is just seen as people being kind.

- Cath spoke of disappointment from sharing information with charities and completing surveys. "They've been surveyed to death". People want to see outcomes, and something change.

Q. What would you say is the most important effect of coronavirus for you? What effect has coronavirus had on your diet or ability to access food? What effect has it had in your community?

- Cath said she has had to admit she cannot navigate day to day life without a mobility aid, so she has obtained one. She said that her mental health has been bad during this time. She is worried she is putting a lot on her partner.

- She said that people are not aware of the support available, which is itself sporadic. Cath stated that access to support is like a lottery, it is dependent on having the right telephone number. People do not want to knock on doors because of the virus, so many people have slipped through the net, particularly those who do not have internet. She suggested that organisations should do a leaflet drop, providing telephone numbers.

- When asked about the school meals vouchers, Cath stated that these now have to be collected from the school on particular days.

Q. Do you have any suggestions for what government, councils or other public services could do to help?

- Cath mentioned three local initiatives which she thought could be learnt from and perhaps extended.

- The Pantry. This is an example of a social supermarket, to give dignity to people using foodbanks. £1 joining fee, then donated food is purchased at half-price. One can get extra big boxes of food.

- The Food Forest, Middlesbrough. Allowing people to grow their own food.

- Feeding Families. This organisation feeds people via social services and job centres. Cath suggested that this organisation could tap into more local groups, allowing them to access wider client groups. There should be some way of combining that with other voluntary groups who are just as valuable.

Q. The Committee will be making suggestions they hope will allow more people to have access to a healthy diet. Is there anything that you think they should understand that they might not know?

- Cath suggested that Government appears to "live in a bubble" and does not take in the reality of how much things in supermarkets cost. She said: "working families are having to access food banks, do they not hear that?"

- She stated that interpersonal support is crucial and that people need a friendly face and someone external to talk to. Support groups play a part in encouraging people. They might, for example, encourage someone to try gardening and growing food, or to take part in a group such as Food Power.

- When Ben Pearson asked whether social welfare support provides enough to have a healthy diet, Cath said that she did not think it did.

Session 5: Heather, Newcastle

Q. How do you choose what to eat? What is most important?

- Heather said that price and time were the key points, and that it has to be cheap and quick. She also said time was a factor and that she "doesn't have time to 'chop everything individually'".

- Heather said she would only buy shop brands. Frozen vegetables are cheaper in larger quantities. She gave the example of stir fry which uses frozen, pre prepared food.

- When asked if she uses take-aways, Heather said she does, because it is cheaper. She said that a standard portion of fish and chips will feed three in her household. She said that this is around £5-£7 and can feed three for a meal. Making it yourself can cost more, if not around the same. When energy costs are factored in, it is more expensive to cook it yourself.

- Heather spoke about energy costs. She uses the electric cooker, rather than gas. She had to change to electric cooker after having moved house and this was an extra expense. She said sometimes she might have to choose between cooking or putting the heating on. She talked about having to keep warm without heating.

- Ben Pearson asked about logistics of shopping. Heather does one big shop a month. For her, shopping on her own isn't something she can do due to disability as she needs help carrying things. Said she is lucky to have a big Asda which is in theory within walking distance. She told us that she does get deliveries but there is a minimum required spend on delivery, so she sometimes has to go to the corner shop, which she thinks is far more

expensive. She said that a can of tomatoes can be 50p more in corner shop than Asda.

Q. What does a healthy diet mean to you? Do any difficulties get in the way of that? What would make it easier?

- Heather thought that fresh fruit and vegetables are more expensive. She stated that you cannot eat healthily if living in food poverty. Focussing on trying to get fruit and veg can waste money, leaving nothing for staples such as pasta and bread. She said that with nuggets and chips, you get more for your money—it lasts longer and feeds you more. Fruit and vegetables go off, people need food that lasts.

- She said that, in the social supermarket (the Pantry), it is a 'lucky dip'. She said that there were lots of potatoes but not much in way of other vegetables and fruit, which were also rare to see in the food surplus distribution centre. She says that it is a struggle to eat healthily when using food surplus centres, and that you can't plan in the same way. Food choice depends on where she can go shopping.

- She said that food is more expensive in the city centre (where she works), and she cannot always bring food into work.

Q. How easy is it for you to cook? What would make it easier for you to cook at home?

- When asked by Ben Pearson about energy costs, Heather suggested that if essential uses of electricity (light, cooking etc) could be distinguished from non-essentials, the essentials could be free. She said that people have to choose between these things. She stated that it was depressing to be always aware, she felt like had to ration the heating and always had to be conscious of putting heat on for an extra half hour. She has had to give blankets to friends visiting her, and felt like this put people off coming round. She felt isolated because of this.

- Heather spoke about mental health getting worse when everything is 'spiralling'.

Q. What does food poverty look like for you or people in your community? What effect does it have on daily life?

Heather spoke about some techniques she has to follow to deal with food poverty. These were:

- Choosing only own brands.

- Shopping in reduced section for fresh fruit, vegetables and meat.

- Putting as much as possible in the freezer to keep it for as long as possible.

- She said this was draining as you had to go out every day to get reduced sticker items. She said what you can eat depends on what you could get.

- Heather mentioned fuel poverty, and of trying to find food that doesn't need to be cooked. She said that this is hard for people on pre-paid meter, who have to constantly check how much energy they have and working out if its more expensive to boil kettle for pot noodle, or cheaper to freeze or use oven. Heather said she was constantly having to make choices, but that you don't have a choice whether to think this way. It is 'mentally draining' having to think about energy costs and cooking.

- When asked what she does when there isn't enough food in the cupboard, Heather said that: "Most people just don't eat."

- Heather stated that "no one wants to admit it, they feel like failures". It is only when you have relationships with people that it is possible to admit food poverty. One of her friends at the same place at work regularly has to say to her, 'I haven't eaten in two days'. It took her friend a long time to ask for help. "She is a proud woman and doesn't want people to know she is struggling".

- Heather referred to in-work poverty. There are 3 people in her household, working most of the time, (one is part-time), but they still can't afford food all month round. She said: 'there is always something going on which is ruining their ability to get them through the month'

Q. What would you say is the most important effect of coronavirus for you? What effect has coronavirus had on your diet or ability to access food? What effect has it had in your community?

- Heather said that the 20% of pay that furloughed people are not receiving might be their food budget for the month. She suggested that this could be the difference between paying one bill and paying the food, then ending up in debt, extra letters and stress on them. Then they have to choose bills over food.

- Heather said that people in her community have always lived pay-check to pay-check: she thinks that most people are about 2 bad months from being homeless.

- Heather said she thinks that people don't have money to save for a rainy day, so there are no savings. For example, if the fridge or freezer breaks, they won't get a replacement for a long time.

- Heather said it is cheaper to buy frozen mince in bulk than fresh. Not everyone has the space to store bulk bought products, so people are forced to buy smaller, more expensive things (eg mince). They cannot stockpile.

- She can only buy some kinds of meat. For example, while she really likes lamb, she would never buy it as it is always expensive. She always went without lamb because she can make more with equivalent mince, which will last longer, for less than the price of one leg of lamb. It also takes longer to cook.

Q. Do you have any suggestions for what government, councils or other public services could do to help?

- Heather said she would like to grow vegetables but has never been able to afford an allotment. If there were more space, growing vegetables would be a good idea, providing this food to the community.

- When Ben Pearson suggested that local councils should provide more community gardens, Heather liked this idea. The allotments near her aren't owned by the council any longer, they are owned by a private group in Newcastle area. "You don't get a response from councils either".

- Heather said it would be good if the community could use spare plots of land near them, they could grow some vegetables, and, if not vandalised, it would look nice.

Q. The Committee will be making suggestions they hope will allow more people to have access to a healthy diet. Is there anything that you think they should understand that they might not know?

- Heather said that a lot of people don't want to be on benefits. She said people feel like failures but sometimes they can't help it, for example physical or mental illness. Making PIP (Personal Independence Payments) easier to access would be helpful for people with disability. She thought that universal basic income would be a good idea, and give people the "ability to live, not just survive".

- She said that she thinks people working in DWP do not understand people's position because they have always got pay-checks coming in. She understands the reality of people not knowing when next payment is going to come in, or whether they are going to sanctioned if their baby's ill: "they have never lived it so they don't know".

- She spoke about "People having some humility", and that people should realise that not everyone getting benefits is a "scam artist". She spoke about the third generation of families not working, but this can be to do with ill health or poor mental health. She feels that relationships should be built to try and understand the reasons behind not working. She said that workers in job centre should have more empathy for people who are not having a good time but are trying to do the best they can.

- Heather sits on the financial exclusion group in her local council. She said she "tells them how it is". She passes on the experiences of others, providing a voice: "we are not there to look at figures but they can put figures where they need to" She said that: "Unless people tell them they won't know!"

- Asked by Ben Pearson if all councils should have this function, Heather said that she thinks this should be mandatory. She said all councils should have a group of people who can state 'grass roots' views. Every council should have this interaction with people.

APPENDIX 6: LEEDS VISIT

Members of the Committee and the secretariat were due to travel to Leeds on 18 March 2020 to understand the work done by Leeds Council and by local organisations in tackling issues regarding food insecurity in the area. Unfortunately, due to the COVID-19 outbreak, this trip had to be cancelled.

The Committee was due to meet with members of Leeds Council and representatives from local organisations. The visit would have included a visit to the Compton Centre, which is one of the Council's Community Hub sites. The Committee delegation was also due to visit Neruka's Soup Kitchen, a project providing meal provision for people in need of food, and CATCH, a community café and Healthy Holidays Programme Leader.

We are grateful to Emma Strachan and Nick Hart of Leeds Council who helped to plan the visit and who have very kindly shared the planned presentations from the organisations we would have met, as well as a briefing[712] detailing their response to the coronavirus crisis.

The following organisations supplied presentations as written evidence to the Committee:

- Leeds Food Aid Network[713]

- Foodwise Leeds[714]

- FareShare Yorkshire[715]

- Leeds Community Foundation[716]

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712 Written evidence from Leeds City Council (ZFP0101)
713 Written evidence from Leeds Food Aid Network (ZFP0105)
714 Written evidence from Foodwise Leeds (ZFP0102)
715 Written evidence from FareShare Yorkshire (ZFP0103)
716 Written evidence from Leeds Community Foundation (ZFP0104)