

Response to Defra Consultation on possible changes to public sector food and catering policy

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Background

Feedback works for food that is good for the planet and its people.

Food production is the single greatest impact humans have on the environment. From mountains of food waste to habitat destruction to clear land to grow animal feed for factory farms, to soil depletion leaving future harvests at risk: the food system needs to change.

Founded in 2013, we combine hard-hitting investigative research, mass public participation feasts, and on the ground pilots for a better food system. As a result, we've put food issues, in particular waste, at the very top of the business and policy agendas. The move towards a food system that nourishes both people and our planet will require significant changes to our food culture, the food economy and its governance. We are seeking to bring about these changes through a unique combination of campaigning and advocacy, citizen engagement and pilot programmes.

Our response to the consultation is rooted within this ethos.

Comments on Specific Questions

8) Should the proposals be made mandatory for educational institutions, local authorities, residential care homes? And if so why?

Yes, they should. Ensuring that the most vulnerable in our society are given the best possible nutrition is essential. Worrying reports are filtering through about reducing portion sizes and quality of ingredients within school catering due to inflation and is directly linked to retention of shareholder profit; therefore, this needs to be challenged. Mandatory requirements for food quality and sustainable procurement within these sectors would ensure continuity of supply and better health outcomes.

9) Should food retail be exempt from public sector food and catering policy?

No. The proliferation of retailers within medical settings, for example, is directly impacting the availability of healthier options within these spaces. It is unfair that public

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sector catering services are expected to follow stringent guidelines whilst their direct competitors, such as WH Smiths, are able to disregard advice about healthy options and sell food that could be regarded as contributing to the illnesses experienced within that setting.

10) How far do you agree or disagree about the guidance principles proposed match the objectives stated?

1. Promote procurement of local, sustainable, healthier food and catering.

A challenge is in defining the values to guide institutional procurement strategy and translating these to inform decision making when awarding contracts. Standards for local and sustainable food can be complex. Plastic waste and food miles are perceived to be the low-hanging fruit.

Sustainability criteria currently embedded in existing law are not ambitious enough. Useful (but non-mandatory) guidelines around food sustainability are set out in both the UK's Balanced Scorecard for Public Food Procurement and EU Procurement Directives (and their environmental and social guidelines). These documents guide procurement managers in taking a holistic approach to food and in designing contracts to deliver benefits across five different aspects associated with food:

1. Production at farm level (including animal welfare, environmental sustainability and seasonality)
2. Health and wellbeing (including nutrition, food safety and traceability)
3. Resource efficiency (including consideration of energy, water and waste)
4. Socio-economic impacts (including fair/ethical trade, inclusion of SMEs and local employment and skills)
5. Quality of service (including food quality and customer satisfaction).

Similarly, accreditation schemes such as the Soil Association's 'Food for Life' standard are valuable as they support the purchaser in thinking about food from multiple perspectives, including farming methods, health, animal welfare, ethics, waste, and local economy. However, sometimes the cost of enrolling can be off-putting.

Another challenge is matching the values and ambition of a procurement strategy to the values of the businesses procured from. For instance, greater transparency is needed around the sustainability criteria and food miles associated with large scale distributors. There is a need for procurement professionals to look beyond the locality of the supplier or distributor and to the food miles associated with the products themselves. Food miles in themselves are complex and are not tied to a single issue (for example, carbon emission). Shorter food miles can have benefits for and ties into social, economic, and environmental sustainability. With many foods, transport is just a small part of the overall emissions associated with food production and waste. However, there are strong arguments for eating local and seasonal food to reduce environmental impacts, as well as the economic and social value delivered when anchor institutions invest in their local

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food system. Shorter supply chains can also allow for greater transparency in terms of the social and environmental impacts of the food being bought.

Accreditation schemes for producers and food suppliers allow procurement teams to clearly see the values and ethics of businesses they work with. Schemes such as the 'Better Food Traders' have a growing network of accredited food businesses across the UK. The scheme provides a framework of principals to support a socially and environmentally just food system, which members have to provide evidence against.

2. Open up public sector supply chains to a wider range of companies, particularly small and medium-sized enterprises (SMEs), to better support local economies, increase resilience, and encourage food producers to innovate.

This is broadly welcomed but the devil is in the detail. A question that remains is whether there will be support provided to enable SMEs to scale up their production to manage a big contract. Even if broken down, the contracts will be significant and will require investment and cash flow to enable participation. There is an emphasis on location, which is welcomed in the context of circular economy principles, but we also need to see a firm commitment to environment and welfare as well, not only a push for locally produced food.

3. Increase transparency of food supply chains to drive continuous improvement and build our understanding of what is bought, served, sold, and wasted in the public sector.

Currently, resilience is not covered within procurement law. With the increasing importance of this aspect of our food system, an important question is how regulation can better support social, environmental, and economic resilience into the future. This could be viewed as a risk assessment and or having a Plan B to trigger when world events disrupt supply chains.

Procurement professionals sit not just within the context of the supply chain but also within their own organisational and institutional contexts. There are multiple pressures on organisations, and it is important to understand where procurement managers sit within their own institutional ecosystems to better understand where those points of intervention and change may come. For example, procurement units in NHS Trusts often reside within finance departments, which may trigger an emphasis on cost efficiency over other goals, such as sustainability.

There is value in having an institutional strategy for sustainability in that it sets out a direction of travel for the entire business or organisation. This provides long-term ambitions that all management staff should incorporate into their decision making and should be supported in doing so.

In large organisations, there is value in developing a team that specialises in sustainability that can provide not just specialist advice and support but also keep on top

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of emerging ideas and approaches. In smaller organisations and businesses, this can be challenging and time-consuming; it can also be hard to know where to start, as sustainability is complex, with many different aspects to consider.

14) How far do you agree or disagree that the proposed new target will be effective in delivering on the vision that public sector food and catering is an exemplar to wider society in delivering positive health, animal welfare, environmental and socio-economic impacts?

Public procurement is often seen as a tool by which we can drive positive change in our food economy, but many of these institutions are faced with huge economic challenges. Indeed, reflecting our commodity-focused food system, cost is still a key driver in the way procurement contracts are awarded. In many cases, this is still public money, and there are severe funding issues within much of the public sector.

Keeping costs down is important for ensuring access to a wide range of different economic backgrounds. We also know that procurement teams also use innovative methods for reducing costs which allows for greater flexibility in food purchasing. But, this highlights one of the clear conflicts in our current food system. Food needs to be affordable, but it also needs to be nutritious, produced sustainably, and provide a secure livelihood to farmers and producers.

Beyond budgetary constraints, procurement teams in public sector organisations are constrained by sectoral policies and regulations (e.g. see the NHS procurement policy) emphasising standardisation and cost control; such regulatory requirements are, in many ways, incompatible with a sustainability agenda.

We see potential for DEFRA to look at these challenges in the context of the changes to policy.

24. a. Standard 1.4: Will it be feasible for the public sector to be entirely supplied with seafood with a 1 to 3 rating in the Marine Conservation Society “Good Fish Guide” or Sustainable Fisheries Partnership score of 8 or above, or equivalent?

No. Setting guidelines to ensure the fish/seafood procured by the public sector is sustainable is clearly important. And while certification schemes and their logos can provide a consumer with a simple, fairly generalised guide as to whether their purchase may be sustainable, there are several problems in terms of relying on these as a true marker of sustainability – particularly at the local level. In this sense, this aim (even including the MCS guide) may not tally with the stated objectives of the policy proposal in terms of the procurement of local produce, to open up public sector supply chains to a wider range of companies, particularly small and medium-sized enterprises (SME) (whose produce may not be certified MSC, or indeed ASC—which should be included here—or rated highly by MCS) for various reasons beyond reflecting the true sustainability of the product – which varies over time, from place to place, with

differences right down to the individual producer. Because of this, requiring a better picture on this level might be a better marker of true sustainability than relying on certification schemes wholly).

Several of the challenges facing small producers in terms of accessibility to schemes like the MSC have by now been well documented. However, neither is the MCS guide immune to problems, particularly in terms of nuance, with some fisheries, according to Seafish, for example, rated too harshly (for example, shellfish fisheries), oftentimes caught by small locally based producers, with high selectivity in well-managed fisheries (such as Scottish brown crab). A reflection of this problem is also seen in the policy document itself, for example, where it states, *“a diverse range of seasonally available seafood species must be procured from locally caught or produced sources, where possible. Seafood with a rating of 4 or 5 in the Marine Conservation Society’s “Good Fish Guide” must not be procured. Tuna and prawns (including where tuna and prawn are ingredients in a processed product) must not be procured, wherever possible.”* What kind of tuna? What kind of prawns? Some tuna fisheries are well managed and sustainable. Prawn fisheries around Britain and Europe are highly managed and sustainable fisheries.

All this is not to say that certified fish/seafood should not play a role in the procurement process, rather that more nuance is required. Further, in terms of the type of certification that should play a role in the process, remaining with the gold standards certification schemes—MSC and ASC—where available is recommended. SFPs rating is much less transparent and accessible for users and should not be included

31. a. How far do you agree or disagree that the recently updated mandatory standard 2.5 ‘Increasing the consumption of fruit and vegetables and best practice standard 2.6 ‘Increasing fibre’ (as set out above) supports/encourages individuals to increase the amount of fruit, vegetables and fibre in their diet?

Feedback recommends that UK local authorities should set a binding target to reduce meat and dairy in public procurement by 20% by 2025 and 50% by 2030. This does not represent “telling people what to eat” – in fact, currently there is a lack of choice of plant-based alternatives, so these measures would broaden choice, with meat still on menus alongside alternatives. It is estimated that nearly 20% of young people in the UK do not eat meat, and 20% more only eat meat occasionally as part of a flexitarian dietⁱ – yet food in UK catering currently does not reflect this, limiting choices for those who want to choose a lower-meat diet. Many public caterers in the UK have already signed up to reach 20% reductions in meatⁱⁱ, so there is willingness to change amongst caterers which should be capitalised on and formalised into a binding target to ensure universal uptake and maximize impact.

Transition to lower meat diets is imperative to ensure we evade climate crisis. If current trends continue, the global meat and dairy industry will be using up almost half the world’s 1.5°C emissions budget by 2030 – that is, the amount of emissions we can safely emit to stay within 1.5°C of climate changeⁱⁱⁱ. This is projected to rise even further to 81%

by 2050^{iv}. Co-chair of the UN Intergovernmental Panel on Climate Change, Hans Poertner, recently said told MEPs: *"Without reducing and cutting down on meat consumption and the associated high-intensity agriculture systems, we will not be able to keep global warming to 1.5 degrees. That is very clear"*^v. It is estimated that halving global meat consumption, substituting this with vegetable-based equivalents, and regrowing vegetation like woodlands on the land spared by reducing livestock production would save and offset a stunning 10.4 mtCO₂eq/year^{vi}, which is equivalent to roughly 20% of total global emissions.

85% of the UK's total land footprint is associated with meat and dairy production, but only 48% of its total protein and 32% of the UK's total calorie consumption derive from livestock products^{vii}. The UK currently has 8.4 million hectares of permanent pastureland, and 5.8 million hectares of cropland of which 55% is used to grow animal feed, meaning that animal agriculture currently occupies 48% of all UK land in total^{viii}.

Every route to the UK meeting net zero modelled by the Committee on Climate Change includes a transition to 20-50% lower meat consumption, with the CCC calling it "particularly important"^{ix}. The National Food Strategy – the first independent review of England's entire food system for 75 years and commissioned by the government – recommends that the UK transition to 30% less meat consumption by 2030^x. The Eating Better coalition of over 60 civil society organisations calls for the UK to reduce its meat production and consumption by 50% by 2030^{xi}. This is more in line with the UK's fair share of global emissions reductions, which would require the UK to meet net zero significantly before 2050, based on the UK's current and historically unfair share of global emissions^{xii}.

33. Standard 3.7: How far do you agree or disagree with mandating the use of the 'Target, Measure, Act' approach and food waste data sharing, as described in WRAP's Food Waste Reduction Toolkit?

Feedback supports the mandatory standards for caterers "3.7 Food waste prevention", including mandatory reporting of on-site and off-site food waste, and providing evidence of implementing a 'Target, Measure, Act' approach. We recommend that the best practice standard to achieve a 50% reduction in food waste by 2030 should be strengthened to become a mandatory requirement. Giving appropriate training to staff in line with Guardians of Grub advice should also be mandatory. Targeted reduction should include plate waste, since this is often where the majority of catering sector food waste occurs, and caterers can influence this, such as through changing portion sizes, presentational changes, and by substitution of often wasted items. We recommend that it is a legal requirement to follow the food waste hierarchy, which requires that prevention be prioritised over surplus food redistribution.

We also support the mandatory standards for "3.8 Food waste collection and management", to require any food waste that cannot be avoided through prevention or by re-distribution for human or animal consumption must be collected

separately and recycled through composting or anaerobic digestion. Training of staff in ensuring compliance with this should be legally enforced.

In addition, Feedback recommends that public procurement can be used as a tool to reduce food waste through sourcing practices. For instance, larger caterers with direct contracts with growers could adopt contracts by hectare, which means that they guarantee to buy all produce grown on a chosen hectare of farmers' land, meaning that caterers have to be flexible to seasonal variations and creatively integrate this into their menus and/or process gluts for longer-term use. Contracts by hectare avoid perverse incentives for growers to overplant or overproduce, because the farmer is not obliged to overproduce to hedge against the possibility of low yields due to yearly weather variations, but conversely the caterer does not guarantee that they will buy up an unlimited volume of surplus food, only from a certain agreed hectare if there is a seasonal glut. Caterers should be required not to impose cosmetic standards on produce and should be tightly regulated to prevent unfair trading practices like last-minute order cancellations driving waste in their suppliers.

Final comments

We stand at a critical moment. Covid-19, droughts in Canada and the Russian invasion of Ukraine has laid bare the fragility of our current approach to food supply chains, in terms of both distribution models and access to food. Climate change threatens far greater disruption, and the food system has a huge role to play in both mitigating carbon emissions and adapting to become resilient to future shocks. The cost of living crisis, precipitated by huge energy increases within Britain, is going to impact every strata of society and will lead to increased requirements for support and food aid. Therefore, public sector catering needs to ensure that whatever meals are supplied within schools, hospitals, care homes, and more are at maximum density of health.

Although procurement teams are working to deliver on multiple objectives around cost, health, sustainability, the economics of the food system, the lack of regulatory steer on sustainability means that small-scale, sustainable food producers struggle to compete with the economies of scale.

A regenerative, nourishing food system demands bold action from policymakers to support smaller, locally rooted initiatives for food economies. In order to realise this vision, it is crucial that we have:

- Local food policies grounded in the principles of circularity, access, and value as set out in our vision.
- Land-use planning that takes account of local preferences, environmental, and nutritional needs.
- Action, backed by regulation, that supports procurement staff in using public money for public good, which includes the provision of training and independent data around what sustainable, resilient food actually is.

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- Regional policy makers who embrace food as an essential stratum of creating zero-carbon, high-quality futures for their citizens.

Devolution is already underway in the UK, and trends suggest that we may continue to devolve power both to regions and to city authorities (such as elected mayors and wider district councils). This trend may need to be accompanied by new forms of regional government, such as regional food boards sitting above local food groups, staffed by food councillors for each neighbourhood.

Food is still not given its own seat at the table when it comes to local government; responsibility for food matters often falls between health, economics, social care, and tourism. Policy making will need to become more sensitive and joined up. Food policy should be a partnership of health, environmental, and economic priorities, rather than being siloed into different departments and, as result, ineffectually tackled. Regional institutions should play a far greater role, with universities, hospitals, and businesses using their buying power as a positive investment in their locality.

Simultaneously, businesses, individuals, and communities need improved access to resources that could be used to grow local food enterprises or projects so as to be able to meet increased demand for local, sustainably produced food. This is why it is so necessary to approach the problems of our current food system through the creation of a cross-sector food vision for the future in which we all have a part to play.

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