



The Food Foundation Submission to The National Food Strategy Call for Evidence: Getting our food policy governance right

October 2019

About the Food Foundation

The Food Foundation is a young, dynamic, impactful and independent think tank working to influence food policy to support healthy and sustainable diets. Working at the interface between academia and policy makers (parliamentarians, civil servants, local authorities, business leaders) we use a wide range of approaches to make change happen including events, publications, media stories, social media campaigns and multi-stakeholder partnerships. We also now work directly with citizens to ensure their lived experience is reflected in our policy proposals. We work with many partners on a range of different thematic areas, working closely with academics to generate evidence and campaigners who can drive change. We are independent of all political parties and business, and we are not limited by a single issue or special interest. We work with others who believe there is a problem with the system and want to change it.

Introduction

We have two food policy governance proposals which will help to deliver the National Food Strategy's vision by accelerating action and embedding accountability:

1. Food system targets and metrics enshrined in law
2. A Children's Food Watchdog

Here we explain why these measures need to be taken by the National Food Strategy (NFS), what they should look like and how they will be effective in improving our food system.

Targets and metrics enshrined in law

The fact that radical change is needed to transform our food system is no longer debated. The NFS has set out its vision for the food system but what is missing is a clear mechanism for judging whether we are going in the right direction. We believe that in order to achieve this transformation in the food system, we should have a legislative framework to sustain commitment and action:

This should:

- Establish a set of metrics and accompanying targets, and mandate government and major businesses in the food system to report to parliament periodically on these to allow review of progress and greater accountability for actions beyond the life of a single parliament.
- Include formal recognition of the government's dietary guidelines and their estimated cost (index linked annually and updated every five years), and require other areas of legislation and government programmes to take them into account – i.e. benefit levels, minimum wage levels, school meal provision, care home provision, hospital food etc.

This takes the dietary guidelines from having little value for citizens or policy makers to making them a critical underpinning for policy decisions.

Metrics and targets should include:

- Statutory overarching targets to provide longevity and clear direction for policy change such as:
 - Halve household food insecurity by 2030 (to align with the SDGs).
 - Halve childhood obesity by 2030.
 - Reducing the greenhouse gas emissions associated with our diets to align with Net Zero commitments.
- Business metrics such as those recently published in [Plating Up Progress](#).

This legislation will create sustained demand for long-term government action; track if adequate progress is being made; and ensure a strong mechanism for accountability and transparency. Business reporting will help investors to support businesses which are moving in the right direction on health and sustainability, and create positive reinforcement for businesses which align with the policy direction.

In order for legislation to have the desired impact, a clear understanding of where responsibility lies for achieving these targets is needed. Cross-government departmental cooperation is vital. Businesses should be supported and encouraged to help deliver these targets. It is also important that the public are engaged, and that citizen-led action to help achieve these targets is promoted.

Examples of other legislative measures

This new legislative framework should learn from other similar legislation to see how it can effectively be used as a tool to deliver change.

An example of this is the Climate Change Act 2008 through which the UK was the first country to introduce legislation to tackle climate change by setting a legally binding target to reach net-zero greenhouse gas emissions by 2050. The independent Climate Change Committee produce annual reports on progress towards interim targets which are debated in parliament and the government has a statutory obligation to respond to.

Federal programs in the USA apply the government's dietary guidelines through food, nutrition, and health policies and programs such as the USDA's National School Lunch Program and School Breakfast Program; the Special Supplemental Nutrition Program for Women, Infants and Children; and nutrition programs for older adults. While there are some issues with implementation in the US, this principle could be built upon in the UK

Scotland are already investigating introducing legislation to help transition to a fair, healthy and sustainable food system through the Good Food Nation Bill^{1,2}. A consultation on this was held and there was strong support for a legislative approach.

The general framework principles of the Good Food Nation Bill would be set out in primary legislation and the detailed provisions in secondary legislation that can be easily updated. It would broadly require ministers and specific public authorities to:

- Publish a statement of policy on food, including indicators and measures of success for approval by parliament.
- Review the statement of policy every five years.
- Report every two years on implementation of the policy and the indicators and measures of success.

We should aim to for a similar approach, but additionally should require larger businesses (e.g. supermarkets, fast food chains and large producers) to do the same, due to their considerable role in shaping the food system.

A Children's Food Watchdog

Children's food in the UK is in urgent need of good leadership. Despite three chapters of the Childhood Obesity Plan being published by government, and the government having long ago ratified the Convention on the Rights of the Child, action has been slow and insufficient - the lack of success clearly demonstrated in the statistics:

- 1 in 5 children in Year 6 are overweight or obese³.
- Over 100 new cases of childhood type 2 diabetes are diagnosed every year – an entirely preventable diet-related condition with lifelong complications⁴.

For children living in poverty the situation is even worse:

- Children in the most deprived areas are almost four times as likely to be severely obese³.
- 19% of children under 15 in the UK live in households with moderate or severe food insecurity⁵.

Childhood obesity and/or food insecurity have profound imminent and long-term complications of physical and mental health affecting quality of life, educational attainment, future productivity and earnings, and cost to the NHS.

Existing policy is clearly inadequate and failing to protect children from the devastating consequences of food insecurity and marked socio-economic differences in obesity. The [Children's Future Food Inquiry](#) (CFFI) found that existing government programmes are insufficient. Less than 50% of children in England living in poverty were entitled to support from the Healthy Start scheme, and only 33% actually received it. In KS2 only 50% of children living in poverty receive Free School Meals (FSM), and in secondary school it's only 42%. Twenty three percent of secondary school children who did not qualify for FSM had gone without lunch because they couldn't afford it. The value of both the Healthy Start Scheme and FSM was also found to be insufficient. There is no monitoring of school meals despite the level of government investment in this programme.

It is therefore clear that progress needs to be rapidly accelerated.

The NFS should commit to the establishment of a ten-year statutory Children's Food Watchdog to break through the existing barriers to solving childhood obesity and children's food insecurity. The Watchdog would drive the necessary policy change to deliver the targets (as described above) to:

- Halve childhood obesity by 2030.

- Halve the number of children living in food insecure households by 2030.

It would empower existing bodies to do more and establish a mechanism to ensure accountability for delivery. It would break through interdepartmental intransigence, reporting to Ministers in the Department of Health and Social Care, Ministers in the Department for Education, and Parliament to deliver improvements in the quality of policy implementation in line with the [CFFI's Right2Food Charter](#).

Critically, the Watchdog would need to include young people in its leadership in order to be impactful. By reflecting children's lived experience – especially those who are most disadvantaged – the change that is most needed can be identified, and effected, empowering children in the process by prioritising their voices and giving them a platform.

If the NFS is going to deliver the long-term vision of transforming our diets and the food system, then we have to start with children – this is the only way to achieve sustainable change and intergenerational impacts.

References

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