



National Food Strategy White Paper

CIEH additional evidence

October 2021

About the Chartered Institute of Environmental Health (CIEH)

CIEH is the professional voice for environmental health representing over 7,000 members working in the public, private and third sectors, in 52 countries around the world. It ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to health and health protection.

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Introduction

As the Department for Environment, Food & Rural Affairs develops a White Paper, following the publication of the National Food Strategy (NFS), we wanted to take the opportunity to submit additional information, which we hope can be taken into account as work on the White Paper develops.

We are pleased that the Government has already acted on four of the seven recommendations in Part One of the National Food Strategy but disappointed that it has not done more to ensure our high food standards are protected or committed to giving Parliament the time and opportunity to properly scrutinise any new trade deal.

We wholeheartedly welcome both the emphasis and direction of the National Food Strategy. It is absolutely right for the Strategy to focus on the sustainability of the food production system as well as tackling the issue of obesity and healthy eating. However, we feel that there are some significant omissions from the National Food Strategy report.

Mandatory display of food hygiene ratings in England

We have long campaigned for a mandatory food hygiene rating scheme in England, to enable consumers to make informed choices about where they eat and purchase food. The experience in Wales and Northern Ireland, where mandatory schemes were introduced in 2013 and 2016 respectively, is that the schemes have driven up hygiene standards of food establishments. These standards are vital for health protection. However, the scheme remains voluntary in England and many food businesses do not display their ratings in a prominent position for the benefit of consumers. [The Food Standards Agency \(FSA\) found that there is public support for this introduction of a mandatory food hygiene rating scheme in England.](#)

It would be a serious omission for the White Paper not to include a commitment to introducing a statutory food hygiene rating scheme in England given public support for such a scheme and the demonstrable benefits. We recognise that a mandatory scheme would need to be coupled with measures to ensure local authorities who deliver the scheme on the ground are sufficiently resourced to sustain the scheme. Over the past decade, the number of food safety and hygiene officers in England dropped by 18% and food standards capacity in local authorities has dropped by 47%¹. In our recent [Workforce Survey](#), we also found that looking ahead 2021/22, 34% of respondents expect their authority's budget for environmental health services to decrease. The National Audit Office found that between 2012/14 and 2017/18, local authority expenditure on food hygiene fell by an estimated 19% from £125 million to £101 million. This will have been exacerbated by COVID-19, with the redeployment of food officer resource by local authorities to deal with the pandemic. This is an important resource, ensuring the safety and integrity of the food we eat, and the profession should be supported. This includes funding for the training of a future pipeline of officers as well as adequate resources at local level.

National reporting system for food allergen deaths and near-misses

The National Food Strategy acknowledges the 338% increase in children's A&E admissions caused by food allergies since 1998 and recently introduced legislation to improve allergy labelling – Natasha's law. However, we are disappointed that the strategy does not go further and recommend a national reporting system for food allergen deaths and near misses which could help avoid future tragedies. In successive Coroner reports to prevent future deaths, they have highlighted the lack of national reporting and registering of allergic reactions as a matter of concern. For example, in [2019 Coroner Harris](#) in his report into the death of Ruben Bousquet who died of acute anaphylaxis to cow's milk allergen from cross-contamination of popcorn, which he had eaten at a cinema in Greenwich said "In my opinion action should be taken to consider establishing a national reporting system which includes timely reporting to local authority and the Food Standards Agency (FSA) and maintenance of a register of fatalities and their investigations."

Allergen-related deaths are not currently included within the Work-Related Deaths Protocol, a document that guides joint working signed by nine organisations including Health and Safety Executive, British Transport Police and the Local Government Association. We call on government to include allergens in the Work-Related Deaths Protocol.

¹ <https://www.cieh.org/media/5683/cieh-workforce-survey-briefing.pdf>

Maintaining the UK's current high food safety standards

One of our key concerns is the risk of UK food safety standards being compromised following EU Exit. The UK has, at present, some of the safest food in the world. This is undoubtedly as a result of the high standards across Europe. These standards are not, unfortunately, universal across the world. New trade deals should not mean we allow foods to be imported that are produced to lower safety, environmental or welfare standards.

We are concerned at the prospect of a flood of lower-standard imports which could undercut British produce, while British producers strive to maintain high standards to be able to export to the EU. We, along with 26 organisations and academics have called on the UK's major retailers and food service companies, asking them to commit to not selling products of lower standards. Many big supermarkets have joined CIEH, pledging their commitment to high food standards. The White Paper needs to reinforce these public protections.

94% of the public want our existing food standards to be maintained in any trade deals the UK does. We call on the government to include in the White Paper, a list of core minimum standards which it will defend in any future trade deals. These should cover food safety, environment and health protection, carbon emissions, zoonotic disease risk, antimicrobial resistance and animal welfare.

Collaboration across the UK

The National Food Strategy recognises that food policy is largely devolved to Wales, Northern Ireland and Scotland and whilst its geographical scope is England, our food systems are interwoven. The White Paper should have at its heart a commitment to working with the devolved nations on food policy due to the interconnected nature of the food supply chains that have become more obvious due to EU Exit.

The Good Food Bill

With almost [one in three people over the age of 45 in England clinically obese and the associated cost of bad diet on government](#) we support Sustain and other NGOs in the creation of a statutory target to improve diet-related health through a Good Food Bill.