



National Food Strategy – Call for Evidence

CIEH submission

October 2019

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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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Environmental Health Practitioners (EHPs) work across our country's food system, ensuring the safety, standards, and quality, of the food that we produce and consume. CIEH believes the environmental health profession is therefore uniquely placed to offer a vital contribution to the National Food Strategy (NFS) for England.

Ensuring high food standards and safety must be at the heart of the NFS. The Food Hygiene Rating System (FHRS) has driven up standards, empowering consumers to make informed choices about where they eat and purchase food. Display of FHRS certificates became compulsory in Wales in November 2013 and in Northern Ireland in October 2016 but remains voluntary in England. Only 52% of food businesses in England display ratings in their premises, compared with 87% and 84% of businesses in Wales and North Ireland respectively.¹ Public support for mandatory display has been consistently high, with 87% of respondents supporting mandatory display in the Food Standards Agency's (FSA) most recent survey of UK consumer attitudes.²

The NFS should speed up the introduction of mandatory display in England to drive up food safety standards and empower consumers to make more informed choices. However, this must be accompanied with measures to ensure local authorities have sufficient resources and capacity to sustain the scheme. Cuts to local authority budgets has made it increasingly difficult for them to deliver food hygiene and food standards interventions in accordance with the Food Law Code of Practice.³ There has been an estimated 13% decline in the number of food hygiene staff (per 1,000 food businesses) between 2012/14 and 2017/18. In the same period, local authority expenditure on food hygiene has fallen by an estimated 19%, from £125 million to £101 million.⁴

The NFS should strongly endorse a holistic approach to food regulation whereby the same food law enforcement officer is responsible for food standards and food hygiene. This is already the case in Unitary Authorities and is more cost-effective, reduces the burden of regulation on business and reflects recommendations made by the Hampton and Lord Young reports.⁵⁶

Food sampling is a vital source of intelligence for regulators and a crucial part of our food standards system. The Food Law Code of Practice states that routine sampling is an essential part of well-balanced enforcement services and can be used for market surveillance to identify emerging risks; as part of routine monitoring of food businesses; providing advice to food businesses; and as evidence for prosecution in cases of food law breaches.⁷ Between 2012-13 and 2017-18, sampling fell by 34%, and in 2018-19, 21 English local authorities did not carry out any sampling at all.⁸ The FSA ceased its coordinated national food standards sampling programme in 2017/18, in which it had previously invested £9.5 million.⁹ The NFS should emphasise the importance of food sampling and of ensuring there is sufficient funding available for independent sampling to be carried out. Sampling is even more important now in terms of public protection given the significant risks posed by food allergens. Sufficient resources to provide an adequate food sampling programme will provide consumers with confidence that the food they buy is safe and what it says it is and meets the relevant compositional standards.

As a member of the EU, the UK is subject to a number of measures to protect public and environmental health. There are over 50 separate EU Directives and Regulations that govern food standards in the UK, whilst more than 40% of all legislation coming out of EU is food related.¹⁰ The US has made it clear that it would only enter a big trade deal with the UK if we abandon our attachment to food standards which the US Government views as unnecessary.¹¹ To abandon the UK's current excellent food standards in the interests of such a free trade deal with the US would present a number of significant potential risks to UK food safety including, beef hormones, bovine somatotropin used in milk production, genetic modification of crops, and the use of chlorinated disinfectants to reduce bacterial contamination of poultry carcasses.¹² The NFS must include measures to ensure that high food standards are maintained or improved post-Brexit and in any future trade deals.

While this submission focuses on safety and standards, we acknowledge the challenges and changes we need to see go far wider. The NFS must include measures to ensure everyone can access affordable and nutritious food. An estimated 10.2 million people in the UK live in "food deserts".¹³ These are areas where individuals without a car or with disabilities that hinder mobility may struggle to access a wide range of healthy, affordable food products. The NFS should explore opportunities for the Government to use planning and licensing tools to tackle the issues of food swamps and food deserts.

Every year the UK wastes an estimated 10 million tonnes of food, 70% of which was intended to be consumed by people.¹⁴ Food is wasted at all stages of the food chain, creating missed opportunities for the economy and food security.¹⁵ The NFS should include a plan for the UK to meet its commitment to halving food loss and waste throughout the system by 2030 as per targets in the UN Sustainable Development Goals. This plan needs to include new ways to tackle the issue, and a review of where existing responsibilities are placed.

Finally, climate change presents a serious challenge for our food and agricultural systems, and therefore risks to the public. Agriculture contributes to 10% of the UK's greenhouse gas emissions; (in Northern Ireland it is much higher at 27%) and the Government has set net-zero greenhouse gas emission targets for 2050.¹⁶ Meeting these targets and honouring the UK's commitments to the UN Sustainable Development Goals and the Paris Climate Change Accord will require radical shifts in the way our food is produced, distributed and consumed. To ensure the UK meets its commitments, the NFS should be linked to the implementation of the Sustainable Development Goals, with reporting on measurable outputs and outcomes.¹⁷

¹ NAO. (2019). Ensuring food safety and standards. <https://www.nao.org.uk/wp-content/uploads/2019/06/Ensuring-food-safety-and-standards.pdf>

² FSA (2019). Food Hygiene Rating Scheme – Consumer Attitudes Tracker (Wave 7): <https://www.food.gov.uk/sites/default/files/media/document/fhrs-tracker-2018-wave-7.pdf>

³ Ibid.

⁴ NAO. (2019). Ensuring food safety and standards.

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- ⁵ Hampton, P. (2005) Hampton Review: Reducing Administrative Burden - Effective Inspection and Enforcement. London: HM Treasury:
http://news.bbc.co.uk/nol/shared/bsp/hi/pdfs/bud05hampton_150305_640.pdf
- ⁶ Lord Young of Graffham. (2010). Common Sense Common Safety:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/60905/402906_CommonSense_acc.pdf
- ⁷ (2017). Food Law Code of Practice for England:
<https://signin.riams.org/connect/revision/zmi2z/Environmental-Health/Food-Law-Code-of-Practice-England>
- ⁸ NAO. (2019). Ensuring food safety and standards.
- ⁹ FSA, (2019). Annual report on local authority food law enforcement. For England, Northern Ireland and Wales: <https://www.food.gov.uk/about-us/local-authorities>
- ¹⁰ CIEH, (2017). Brexit and Environmental Health: Parliamentary Briefing:
<https://www.cieh.org/media/1169/brexit-and-environmental-health.pdf>
- ¹¹ FRC Brexit Briefing Paper: Feeding Britain: Food Security After Brexit.
<https://foodresearch.org.uk/publications/feeding-britain-food-security-after-brexit/>
- ¹² Ibid.
- ¹³ Corfe, S. (2018). What are the barriers to eating healthily in the UK?" The Social Market Foundation:
<http://www.smf.co.uk/wp-content/uploads/2018/10/What-are-the-barriers-to-eating-healthy-in-the-UK.pdf>
- ¹⁴ WRAP (2019). Food Surplus and Waste in the UK – Key Facts:
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- ¹⁵ FAO. Food wastage footprint & Climate Change: <http://www.fao.org/3/a-bb144e.pdf> (retrieved: 23 July 2019).
- ¹⁶ RSA. (2019). Our Future in Land: <https://www.thersa.org/discover/publications-and-articles/reports/future-land>.
- ¹⁷ UN General Assembly, (2015). Transforming our world : the 2030 Agenda for Sustainable Development:
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