

Written evidence submitted by Dr Kelly Parsons and Professor David Barling - University of Hertfordshire Food Systems and Policy Research Group (COV0125)

Expertise

Dr Kelly Parsons

Research Fellow at the University of Hertfordshire in the Food Systems and Policy Research Group. I have an interest in policy and governance related to food systems. My research covers: UK food policy – past and present; policy integration; policy coherence; food governance arrangements; and systems approaches to food. More specifically, my recent research created what I believe to be the first map of government actors and activities on food in England¹, and investigated how food policy is currently connected across government departments, and where disconnects between issues and activities are perceived to be undermining the coherence of food policy.

Professor David Barling

Professor of Food Policy and Security at the University of Hertfordshire, head of the Centre for Agriculture, Food and Environmental Management (CAFEM), and lead of the Food Systems and Policy Research Group. My research covers food policy and governance and food sustainability and security, including the governance of food systems and food supply chains.

Have the measures announced by the Government to mitigate the disruptions to the food supply chain caused by the pandemic been proportionate, effective and timely?

1. There have been a range of positive policy interventions by Government to mitigate disruptions, including relaxing rules on industry collaboration, delivery and driver restrictions; use of a public-private body to support Defra liaison with the food industry; creation of a cross-ministerial task force on vulnerable groups; a national school food voucher scheme, and food box deliveries to shielded households. In some cases, Government measures have been reactive, following pressure from private and civil society sectors, raising questions about *timeliness* and preparedness, particularly around emergency food aid.
2. The pandemic has magnified certain existing challenges around the *effectiveness* of public policies and governance structures addressing food systems (which food supply chains are at the centre of)². Formal coordination across the range of food-related activities taking place in different government ministries and different levels of government is rare, meaning policies targeting different parts of the food system can be made in isolation or responsibilities are unclear³. There are challenges around the inclusion of food system stakeholders beyond large private sector companies in government decision-making.
3. Food policy arrangements which suffice on a day-to-day basis may be inadequate in periods of food system crisis, such as a health or climate emergency. Food system shocks such as Covid-19 (also Brexit) illuminate how many parts of government have

¹ <https://foodresearch.org.uk/publications/who-makes-food-policy-in-england-and-food-policy-coordination-under-covid19/>

² https://www.city.ac.uk/__data/assets/pdf_file/0008/471599/7643_Brief-2_What-is-the-food-system-A-food-policy-perspective_WEB_SP.pdf

³ [https://www.city.ac.uk/__data/assets/pdf_file/0008/491174/7643_Brief-](https://www.city.ac.uk/__data/assets/pdf_file/0008/491174/7643_Brief-3_Integrated_food_policy_What_is_it_and_how_can_it_help_connect_food_systems_WEB_SP.pdf)

[3_Integrated_food_policy_What_is_it_and_how_can_it_help_connect_food_systems_WEB_SP.pdf](https://www.city.ac.uk/__data/assets/pdf_file/0008/491174/7643_Brief-3_Integrated_food_policy_What_is_it_and_how_can_it_help_connect_food_systems_WEB_SP.pdf)

a role in food⁴, intensify the requirement for policy coordination between them, expose ‘governance gaps’ where food policy responsibilities need clarification and raise the prospect of new governance structures for food policy.

4. While further evidence on the Government’s response will be required for a thorough analysis, media reports and anecdotal evidence from think tanks and civil society groups suggest coordination could have been more effective. And it seems reasonable to conclude the potential for a more coordinated, or ‘integrated’⁵ approach should be explored in advance of future system shocks. Policy integration is aimed at improving effectiveness by joining up goals and activities, and can happen horizontally across government departments, vertically between government levels (for example national and local) and between state and non-state actors.

Sharing of responsibilities between Government, Private Sector and Civil Society

5. Responsibilities for food are shared across the public sector (national and local government), private sector (food industry), and civil society (Non-governmental organisations like charities). Certain impacts of Covid-19 on the food supply indicate the need for improved links between these actors. For example, Government intervention to close food service businesses to help lessen the spread of Covid-19 led to dislocation of dedicated supplies to these outlets, and severe disruption to domestic livestock and dairy producers supplying food service. High price cuts of beef to restaurants were unable to access the retail supply chains in a timely fashion and in some cases were converted into cheaper minced beef portions to meet increased consumer demand. Milk for food service was poured away at the farm as supply chains closed. These disruptions occurred with a costly time lag before some degree of transfer to other supply chains, indicating better prepared emergency planning systems should be in place where food supply shocks occur, ones that work in tandem with the realities of supply chains’ access to consumption markets.
6. A further example is access to food for the vulnerable – whether they be shielding at home, or reliant on food from charitable sources such as food banks. Here, with the supply chain alone unable to meet demand, Government intervention, such as on free school meal vouchers, lagged behind requirements on the ground. This left the civil society sector to fill the gap in emergency food aid, and led to calls for further government intervention, such as a state-led ‘National Food Service’⁶.
7. More specifically, Covid-19 exacerbated an existing critical food system failure: the high levels of food insecurity caused by poverty; managed through a precarious reliance on charitable provision such as food banks, with support from the private sector. Stockpiling in the early phase of the pandemic, which undermined the purchasing ability of food banks, highlighted vulnerabilities in their reliance on supermarket supplies.
8. The question of *proportionality* of government measures relates to wider policy and political debates around the level of intervention by states in the food systems, and whether there is a correct balance between state, private sector and civil society roles.

⁴ <https://foodresearch.org.uk/publications/who-makes-food-policy-in-england-and-food-policy-coordination-under-covid19/>

⁵ https://www.city.ac.uk/__data/assets/pdf_file/0008/491174/7643_Brief-3_Integrated_food_policy_What_is_it_and_how_can_it_help_connect_food_systems_WEB_SP.pdf

⁶ <https://www.independent.co.uk/news/uk/politics/coronavirus-rebecca-long-bailey-national-food-service-self-isolation-a9418266.html>

In time, Covid-19's impacts on the food system should inform a national societal dialogue about how much, and what kind of, state intervention in the food system is desirable. Harnessing the views of the public on government intervention was an important stated aim of the forthcoming National Food Strategy. This approach should be extended in light of Covid-19, to include the impact of changes to supply from the pandemic on public views on food⁷.

Horizontal coordination across Government

9. Challenges in coordinating the food response *across* government are not surprising given that at least 16 departments - plus agencies, public bodies and advisory groups - are involved in food policy in England. A new map of England's food policy actors and activities highlights responsibilities across the food system⁸, ranging from Defra for agriculture and the environment, the Food Standards Agency for food safety and standards, DHSC for diet and nutrition, BEIS for food industry strategy, and – increasingly – DIT for food trade⁹. Each of the many departments involved in food policy has a role to play in addressing Covid-19¹⁰.
10. The pandemic has confirmed the need to better connect certain policy activities already identified in pre-Covid research on the coherence of England's food policy¹¹. Four examples are provided here. Firstly, hunger had already been identified as falling between the cracks of current food policy remits.¹² Secondly, the potential for better coordination of policy around food provision initiatives, such as school meals, school milk and fruit and vegetables schemes, where responsibilities cross multiple departments and levels of government, was identified by pre-Covid research, chiming with reports of confusion over responsibilities during Covid-19¹³. Thirdly, the failure to underpin food policy interventions with our national dietary guidelines is pertinent to the need to prioritise nutrition during the crisis and recovery, including in relation to welfare support. Finally, food crises inevitably raise questions about food security, a policy issue which crosses multiple government remits, primarily agriculture and trade, two policy areas which - pre-Covid - were flagged as requiring better connections post-Brexit, but also health.
11. Government cannot plan for every potential shock to the food system, but clarifying responsibilities, and having recourse to some kind of dedicated cross-cutting food plan, coordination structure or body, could help to improve the effectiveness of its response. Similar conclusions were reached following previous food crises. The initial phase of the 2013 'horsemeat scandal', (when items on sale in the UK and labelled as containing beef were found to contain undeclared horsemeat) was characterised by confusion from stakeholders over which government department or agency should be

⁷ <https://www.thersa.org/about-us/media/2019/brits-see-cleaner-air-stronger-social-bonds-and-changing-food-habits-amid-lockdown>

⁸ <https://foodresearch.org.uk/publications/who-makes-food-policy-in-england-and-food-policy-coordination-under-covid19/>

⁹ <https://foodresearch.org.uk/publications/who-makes-food-policy-in-england-and-food-policy-coordination-under-covid19/>

¹⁰ <https://foodresearch.org.uk/publications/who-makes-food-policy-in-england-and-food-policy-coordination-under-covid19/>

¹¹ Parsons, K. (forthcoming): Rethinking Food Governance reports are / will be available at <https://foodresearch.org.uk/workstream-2/>

¹² <https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/1491/149105.htm>

¹³ <https://www.foodservicefootprint.com/confusion-over-coronavirus-catering-contingency-plans/>

their point of contact¹⁴. Post-crisis evaluations of the policy response pointed to the need for a joined-up approach across many government departments¹⁵.

Current and future food governance arrangements

12. Despite the numerous actors and activities involved in food policy, there is no dedicated department, senior minister or overarching framework to ensure these different elements work together¹⁶. While Defra has food in its title, and is the primary point of contact, there is scepticism over its suitability to steer policy across all food system objectives (for example on nutrition)¹⁷. There are many examples of connected working on food during normal circumstances. However, because these tend to be focused on single issues (such as childhood obesity), and on softer mechanisms such as personal connections and issue-specific working groups/task forces, it is not clear how well these can be adapted to crisis situations which require coordination across the food system.
13. Food crises inevitably raise questions about whether a new mechanism¹⁸ – such as a food plan, taskforce, body, dedicated minister or department - is required. More information is needed to ascertain how effectively the existing framework has performed, and what any new governance approach to food might look like. Research has indicated diverse views on the range of options which could be employed¹⁹. National Food Strategies can clarify responsibilities and provide an agreed framework for decision making around food. Dedicated food coordination mechanisms in England have been used in the past, including a cross-government Cabinet Sub-Committee on Food, a Food Policy Task Force of officials, an independent Council of Food Policy Advisors, and a dedicated food policy unit within Defra. Hunger issues magnified by Covid-19 will likely lead to renewed focus on legislative mechanisms to enshrine government responsibility on food provision, linked to the Right to Food. Departmental remits can be clarified or re-designed to enable the current needs of the food system to be more effectively addressed, as with the establishment of the Food Standards Agency following food crises such as BSE²⁰. There are possibilities to connect food issues through parliamentary mechanisms: recent collaboration between the International Trade Select Committee and EFRA is a positive development which could be expanded, for example to the Health and Social Care Committee, to ensure nutritional priorities in food supply are recognised.

Are the Government and food industry doing enough to support people to access sufficient healthy food; and are any groups not having their needs met? If not, what further steps should the Government and food industry take?

¹⁴ Parsons K, Barling D, Lang T. UK Policymaking Institutions and their Implications for Integrated Food Policy. *Advances in Food Security and Sustainability*, 3. 2018 Nov 12;3:211

¹⁵ <https://www.gov.uk/government/publications/elliott-review-into-the-integrity-and-assurance-of-food-supply-networks-final-report>

¹⁶ <https://foodresearch.org.uk/publications/who-makes-food-policy-in-england-and-food-policy-coordination-under-covid19/>

¹⁷ Parsons, K. (forthcoming): Rethinking Food Governance reports are / will be available at <https://foodresearch.org.uk/workstream-2/>

¹⁸ The term mechanism is used to refer to the processes and structures of government

¹⁹ Parsons, K. (forthcoming): Rethinking Food Governance reports are / will be available at <https://foodresearch.org.uk/workstream-2/>

²⁰ Parsons K, Barling D, Lang T. UK Policymaking Institutions and their Implications for Integrated Food Policy. *Advances in Food Security and Sustainability*, 3. 2018 Nov 12;3:211

See comments above

What further impacts could the current pandemic have on the food supply chain, or individual elements of it, in the short to medium-term and what steps do industry, consumers and the Government need to take to mitigate them?

1. While supply is - understandably - the immediate priority, the food supply chain's location at the centre of a wider connected food system should not be neglected in any policy response to the pandemic. The food system is an 'interconnected system of everything and everybody that influences, and is influenced by, the activities involved in bringing food from farm to fork and beyond'²¹. When specific food policy solutions are implemented, the interconnections in the system mean all dimensions are affected, directly and indirectly, intentionally and unintentionally. The connected nature of this system, and the need to balance the multiple goals across that system - economic, health, environmental and social - should be the holistic lens through which any future interventions in the food supply chain are viewed. This will help ensure that responses to one problem - Covid-19 - do not exacerbate or create new problems elsewhere. The history of food policy illustrates how rational policy decisions made at critical junctures in time create a path dependency in the system, for example the far-reaching ecological and dietary consequences of British post-war production policy objectives which have dominated for decades.
2. There is a risk that Covid-19 leads to objectives around human and planetary health being traded-off against production priorities. For this reason, it is crucial that - for example - England's developing food-related policies, which attempt to prioritise environmental goals alongside with production goals, including the Agriculture Bill and Environmental Land Management Schemes, are not watered down. Such tensions between farmer organisations and environmental policy objectives are already arising at European level as a result of Covid-19²². Likewise, healthy diets should be linked to food supply objectives, rather than calories of any kind.
3. In the wake of the pandemic, it will also be timely for policy-makers to promulgate a revised approach to fairness, sustainability and collaboration in our food supply. The pandemic has elevated public and political recognition of the vital role of the labour force in the food supply as key workers for the economy. Yet the nature of work along food supply chains is low paid, and often precarious, being part-time and seasonal. While fairness in relation to buyer-supplier relationship has led to regulatory interventions, fairness for the labour force has been absent from these policy considerations.²³ The imminence of the harvest in the UK salad vegetable and fruit season - which can support healthy diets - has heightened the importance of workers, at home and abroad (where the bulk of Britain's fruit and vegetable supply comes from). Domestically, Britain' relies on a temporary and largely immigrant labour force. The estimated need is 70-80,000 workers annually just for the fruit and vegetable harvesting and processing alone. Added to this are the immigrant workforces in the meat slaughterhouses and processing plants. Plans have been made to recruit workers from the domestic labour force who are furloughed from their normal occupations to fill these requirements such as Pick for Britain²⁴. However, larger scale growers have flown over

²¹ https://www.city.ac.uk/__data/assets/pdf_file/0008/471599/7643_Brief-2_What-is-the-food-system-A-food-policy-perspective_WEB_SP.pdf

²² https://corporateeurope.org/en/2020/04/dont-let-industrial-farming-and-corporate-lobbies-use-covid-19-crisis-defend-continued?utm_source=dlvr.it&utm_medium=facebook

²³ www.valumics.eu

²⁴ pickforbritain.org.uk

experienced returning workers, such as from Romania, as they have the skill set to perform the tasks to meet the market requirements. It is these workers who are likely to train the new domestic recruits. The role of labour is in need of adequate recognition and reward, as well as improved working conditions, rights, and immigration policies allowing for adequate seasonal agricultural and horticultural workers.

4. Covid-19 has also highlighted opportunities to strengthen food policy coherence through collaboration in supply chains. Competition law seeks to protect consumer welfare from unfair practices by firms²⁵. In March, the British Government waived the Competition Act, allowing retailers to collaborate in order to protect consumers by ensuring security of food supplies. The Act allows for suspension for exceptional and compelling reasons of public policy. The British government had previously sidestepped collusion concerns when setting up the Food Industry Sustainability Strategy in the mid 2000s which led to collaborative actions by the food manufacturing industry to reduce carbon emissions, water use, waste and packaging. In these instances, conceptions of the public interest have emerged in practice, going beyond that of consumer welfare-price prerogative, namely feeding the public and environmental sustainability. A lesson to be considered more fully from the current events is how the public interest can be best served given the pressing imperatives of transition to a zero carbon future and a healthy population to ensure a sustainable and resilient future food supply.
5. As discussed above, a dedicated food body may be required to support government to make a coherent policy response to the pandemic; brokering policy trade-offs and enabling different departments to capitalise on synergies from any policy interventions which are part of recovery. An example of a political trade-off which has been thrown into relief by the pandemic is the tension between worker safety and economic production pressures, as exposed by meat production developments in the USA, and also highlighted in the letter to the EFRA committee submitted by the Chair of the Food Standards Agency in April. Likewise, potential synergies might include linking job-creation objectives with support for short supply chains, and improving and production and dietary diversity to enhance resilience.
6. Along with managing such trade-offs, a 'systems approach' could be employed to identify vulnerabilities and resilience which already exist in the food system (such as the important contribution local food networks have made to food supply during the pandemic), and consider how policy can best address these without creating unintended negative consequences. The expertise of the Defra Systems Research team²⁶, plus knowledge from the wider food systems research community, some of which is being coordinated by the new UKRI Transforming the UK Food System Programme²⁷, could be a useful source of support for government.

How effectively has the Government worked with businesses and NGOs to share information on disruptions to the supply chain and other problems, and to develop and implement solutions? How effectively have these actions been communicated to the public? No Comments.

²⁵ The main concerns are that monopolies or monopolistic practices such as collusion by firms result in market distortions raising the cost of products to the consumer

²⁶ <https://www.gov.uk/government/news/science-research-programme-launched-to-inform-defra-policy-making>

²⁷ <https://bbsrc.ukri.org/funding/filter/transforming-the-uk-food-system-for-healthy-people-and-a-healthy-environment-call/>