

Policy and governance questions about the National Food Strategy

A new [National Food Strategy for England \(Part II\)](#) has just been published (following on from [Part I](#) in 2020).

The team in the University of Hertfordshire's Food Systems & Policy research group have been conducting research on food policy for more than twenty years. Their previous work on the topic has addressed: joined-up food policyⁱ; the challenges of integrating health, environment and society in food policyⁱⁱ; the history of UK food policy and attempts to create a national food policyⁱⁱⁱ; who makes food policy in England^{iv}; how food issues are connected across government^v; the food policy response to the Covid-19 pandemic^{vi}; and policy levers for food system transformation^{vii}.

Here, they provide some immediate reflections on the National Food Strategy Part Two (NFS), focusing on the policy and governance measures proposed, followed by a background briefing on national food strategies.

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What is the National Food Strategy?

The National Food Strategy - an independent review of food commissioned by government - is a vision for a future food system, and a plan for how to achieve that vision. It has been badged as the first government food strategy for 75 years, though England has published national food strategies before (see Appendix). The Strategy positions the food system as both a miracle (for feeding so many people), but also a disaster for our health and the planet. It offers a detailed and thoughtful explanation of why change is needed to address the major issues facing the food system: climate change, biodiversity loss, land use, diet-related disease, health inequality, food security and trade. It groups its objectives under four headings: Escape the junk food cycle to protect the NHS; Reduce diet-related inequality; Make the best use of our land; and Create a long-term shift in our food culture.

The objectives are dominated by health and environmental considerations, rather than food as an economic sector. It can be difficult to compare these types of policies, because there is no standard requirement for what a national food strategy is, or does, and the term is used as a label for several different types of government policy about food. But often they are explicitly a plan to support and grow a country's agri-food sector, or include this aim alongside looking more broadly at the many different issues and policies related to food, including diets. In theory, a broad, overarching national food strategy of this kind - also referred to as a 'national food policy', or 'integrated food policy' - is an opportunity to bring the range of policy activities related to food together in one place, both to 1) raise food higher up the policy agenda, and 2) to make sense of how it all fits together and better coordinate the different decisions and policies. This kind of cross-cutting strategy is also an opportunity to address sometimes competing economic, social, health and environmental policy priorities related to food, for example the kinds of food which are sold, advertised or imported to benefit the economy vs the kinds of foods we should be producing and eating to keep us healthy, or

to reduce climate change impacts. More details on the aims and challenges of developing integrated food policies can be found in this [briefing paper](#).

What policy measures are recommended to achieve its aims, and who in government will deliver them?

There are 14 recommendations in the report. Some of the 14 relate to individual policy measures, while others are for ‘packages’ of interventions. There is a combination of innovative new measures – such as the salt and sugar reformulation tax, and mandatory reporting for food companies, and upcycled versions of existing measures which are not working as effectively as they might, for example food public procurement and dietary guidelines. Table 1 lists the policy measures, along with the government department, agency, non-departmental public body, and level (national/local) the report recommends to deliver them.

Table 1: National Food Strategy Proposed Policy Measures and Responsibilities

	Recommendation	Suggested Responsibility for Development/Delivery
JUNK FOOD	Sugar and Salt Reformulation Tax	Not specified (but will involve HM Treasury)
	Eat and Learn Initiative for Schools: <ul style="list-style-type: none"> • Sensory Education • Food A-level + Review other qualifications • Accreditation requirement • Inspection of Cookery and Nutrition lessons and publication of ‘research review’ • Funding for ingredients in cooking lessons Double funding for School Fruit & Veg Scheme Address recruitment of food teachers Update School Food Standards (in line with Reference Diet when created)	Department for Education (DfE) Office for Health Protection (OHP) OFSTED
INEQUALITY	Extend Eligibility for Free School Meals	‘The Government’ DfE (on Automatic Enrolment)
	Funding for Holiday Activities and Food Programme	DfE
	Expand Healthy Start Scheme	Department of Health and Social Care (DHSC)
	Community Eatwell Programme, including: Social prescribing of fruit and vegetables Community infrastructure investments (kitchens, street markets)	DHSC National Health Service (NHS) - Primary Care Networks
LAND	Guarantee budgets for agricultural payments (and 30% to net zero/nature farming projects)	Department for Environment, Food & Rural Affairs (DEFRA)
	Create Rural Land Use Framework	DEFRA Ministry for Housing Communities and Local Government Department for Business, Energy and Industrial Strategy
	Define minimum trade standards and mechanism	‘The Government’

FOOD CULTURE	£500mn Challenge Fund	DEFRA DHSC 'Other Government Departments' UKRI
	Agricultural Transition Plan Innovation Fund (existing measure)	DEFRA
	£50mn Alternative Proteins Cluster	DEFRA
	Reference Diet incorporating health and environmental considerations	Food Standards Agency (FSA) OHP Scientific Advisory Committee on Nutrition (currently Public Health England) Office of Environmental Protection (OEP) Climate Change Committee (CCC)
	Environmental Food Labelling	Not specified (but likely to involve FSA if remit expanded)
	Strengthen Procurement Policy, through: <ul style="list-style-type: none"> • Redesign of Government Buying Standards for Food • Mandatory Accreditation Scheme • Monitoring and Enforcement Mechanism • Rollout of Dynamic Procurement 	DEFRA FSA
	There are several recommended measures under the objective Food Culture (and one under Junk Food) - which we list below under governance	

Source: Authors, from National Food Strategy Part II

What food governance proposals are in the NFS?

Table 2 details the governance-related proposals; those focused on the arrangements for policymaking. The proposals are dominated by more robust monitoring of the food system and related policy activities, to enable government to be held to account for progress; plus an expanded remit for the Food Standards Agency to cover healthy and sustainable food advice and measures. The FSA's existing obligation 'to promote the consumer interest would be redefined in law to include our collective interest in tackling climate change, nature recovery and promoting health, in the resilience of our food supply, and in meeting the standards that the public expect'. Adapting the FSA is justified as less costly, and less confusing, than a whole new body, and the FSA is positioned as well-placed to take a 'whole-systems perspective'. It remains to be seen whether the FSA's historic focus on the post-farm gate food system, and on consumers, and proposed remit for *diet* shift can deliver a holistic view, particularly given the remit of DEFRA across some of the collective interest areas, including nature recovery, and resilience. Also, will the FSA have the capacity, and the necessary budget to take on these tasks successfully? Additional resources required for monitoring the policy measures recommended are acknowledged in the Strategy, which notes for example that if responsible, the FSA would require the recruitment of more Environmental Health Officers, 'at considerable cost'.

Table 2: Governance Arrangements Proposed in the NFS

Aspect of Governance	Proposal	Suggested Responsibility for Delivery
Targets, Monitoring	Good Food Bill (including health targets)	DEFRA
	State of the Food System Report (to be presented to Parliament) Good Food Action Plan	FSA Parliament OEP CCC OHP Food and Drink Sector Council
	Mandatory Reporting (of food sales and waste) for larger food companies (over 250 employees)	FSA 'Food Companies'
	Review Food Security Annually	Not specified
	Expanded Role for Food Standards Agency	FSA
Evidence Generation, Translation and Adoption	What Works Centre: Farming Sustainably (150mn)	DEFRA Agriculture & Horticulture Development Board
	What Works Centre: Diet Shift (£50mn)	DEFRA DHSC
Data	National Food System Data Programme (evidence on land and post-farm-gate activities and health and environmental impacts)	DEFRA Chief Scientific Adviser (CSA) to the Government DEFRA CSA DHSC CSA BEIS CSA FSA CSA Geospatial Commission Office for National Statistics
Local Government Food Strategies	Duty on Local Authorities to put in place a food strategy	Local Government
Reference Diet Requirement	Requirement to be used by all public bodies in food-related policy-making and procurement	All Public Bodies

Source: Authors, from National Food Strategy Part II

Will the governance arrangements proposed address identified weaknesses in the current approach to food policymaking?

Many weaknesses which have been identified in the current food policymaking arrangements are addressed in the NFS. The proposals for What Works Centres address the issue of poor institutional memory and lack of policy learning over time, whereby new policies are introduced without reference to what has been attempted previously and whether it was successful. The Good Food Bill supports long-term thinking - and acting - on the food system, and can help alleviate challenges around short-term electoral cycles which can interrupt and reset progress. Although it will enshrine largely procedural rather than any substantive policy commitments. A new more rigorous and transparent approach to evidence, and data on the food system, could also improve monitoring of progress, and inform more effective policy design. The duty for Local Authorities to produce a food strategy addresses the current patchwork approach, whereby some cities have food plans while others do not.

However, there are some gaps in the proposals. One is around facilitating more connected policymaking, which is discussed in detail below. Another is participation. The NFS took a

commendably participatory approach to its development, utilising deliberative dialogues and citizens summit, town hall events, consultations with young people. But there is no indication this commitment to participation extends post-development, and stakeholders may be disappointed that no formal mechanisms have been proposed to improve access to food policymaking (as has been part of the food governance arrangements in Brazil, for example). The What Works Centres can play a role in translating evidence applied in policymaking for citizens, but are not targeted at participation. There is no cross-food system stakeholder advisory body proposed (as recently introduced in Canada to support a systemic approach to its national food policy). There is reference to the FSA consulting with the Food & Drink Sector Council, a largely private sector body.

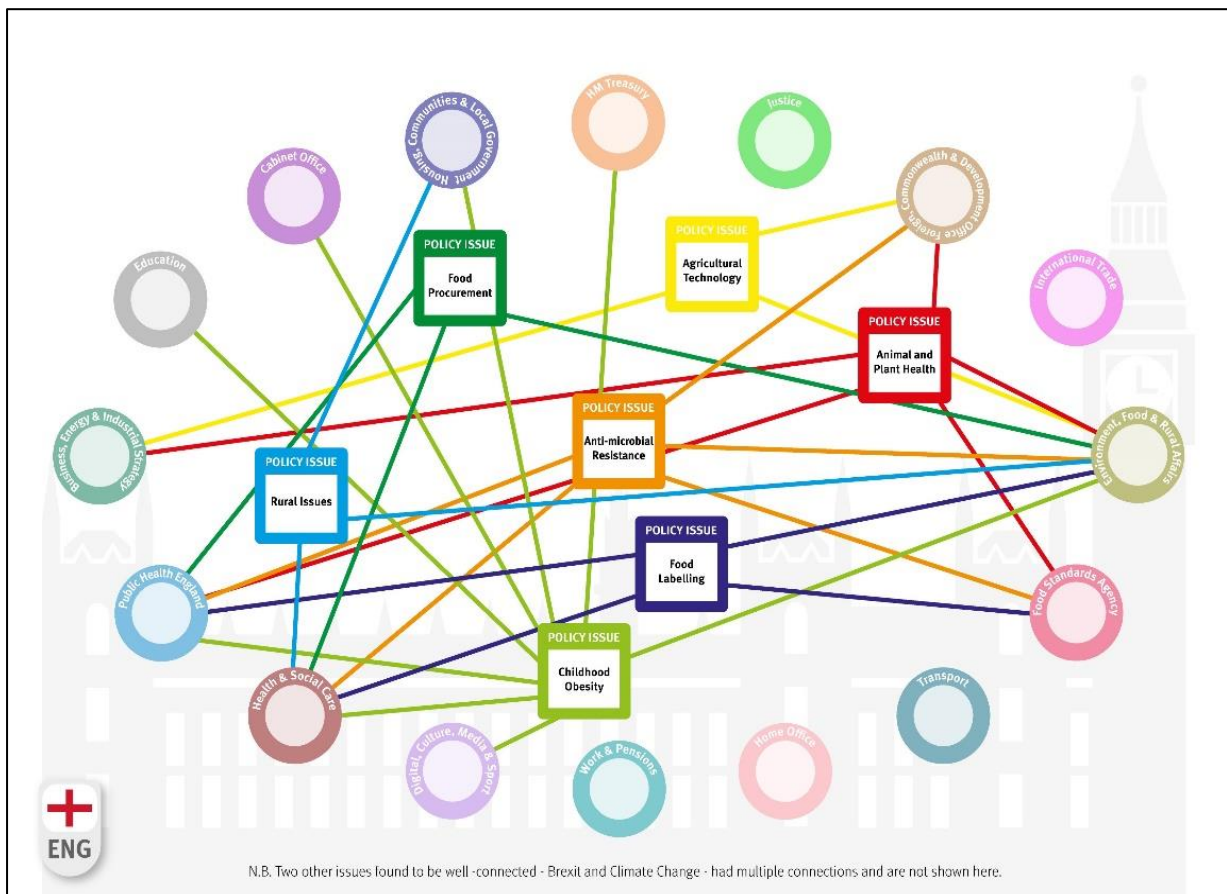
Does the NFS address the need for food policy coordination?

Policy coordination does not explicitly feature in the proposed arrangements; the role of the expanded FSA appears to be predominantly monitoring, rather than facilitating cross-cutting work. Table 1 highlights the range of government departments and other public sector organisations which will need to deliver on the Strategy’s recommendations. DEFRA and the FSA dominate, and will need to coordinate closely, but there are many other departments which will require linking up. An important site for coordination will be trade policy, given its impacts on agriculture and health policy objectives. Food standards will be relevant to both the Department for International Trade and FSA. Another cross-cutting issue will be the Reference Diet; where shared governance responsibilities across FSA, OHP, CCC and OEP will require a connected approach. It is not clear where the impetus, and capacity to connect objectives and organisations will come from. As noted in the NFS, policies related to food are made by many different government departments. [Research by Parsons](#) produced the first mapping of government departments and food-related responsibilities in England, and detailed at least 16 departments, plus agencies and other bodies, with relevance to food policy, as illustrated in the diagram below.



In England, for example, the Food Standards Agency is responsible for food safety, through overseeing enforcement of safety rules such as through environmental health inspections, that are carried out by local government officers, and giving advice including informing when foods are recalled by companies due to safety issues. The Department of Health and Social Care (DHSC) is in charge of plans for reducing obesity, what nutritional information is provided on food labels, and setting standards on the healthiness of food served in schools and hospitals. DHSC's agency Public Health England, for the time being at least until it is [disbanded](#) and replaced by an [Office for Health Promotion](#), provides guidance on how to eat healthily. The Department for Environment, Food and Rural Affairs decides what financial supports are paid to farmers and fishers, animal welfare, and how the impacts of farming on the environment, such as pollution, are dealt with.

Beyond these 'big four', departments making decisions about food include: the Department of International Trade, on what food is imported and what standards are applied to that food (for example whether imported meat has been chlorine-washed), the Department for Business, Energy and Industrial Strategy, on how food companies contribute to the economy, and how they work together, the Department of Digital, Culture, Media and Sport on what advertising of unhealthy food by companies is allowed, including in the media and through sponsorship of activities like sport, and the Department of Work and Pensions on the social security payments which directly impact the amount of money that many people have to spend on food. Many food-related issues cross the remits of several government departments, and require joint working. Examples are illustrated in the diagram below.



Source: Parsons 2020^{viii}

A great deal of effective coordination takes place between these different departments and other organisations. This is illustrated by University of Hertfordshire [research on the food policy response to the Covid-19 pandemic](#), which details the wide range of food-related policy measures put in place

by many government departments, food companies and charities. But there are also coordination failures: one example is the lack of prioritisation of healthy diets in many policy decisions, such as food assistance parcels provided to the vulnerable and school children, the incoherence of the *Eat Out to Help Out* scheme halving costs at fast food outlets; and an absence of government advice around healthy eating. The Strategy's proposal to underpin decisions by public bodies with the Reference Diet is a positive proposal which could help to improve coherence of food policies with health and environmental objectives. However, it is unclear how this will work in practice.

The Strategy itself points to several requirements for coordination, including: the need to align trade policy with agriculture policy; the need to ensure policy interventions are coherent with the government's dietary guidelines; and the need for 'joined-up thinking across government' to 'create a new deal for livestock farming'. The report also notes a public desire for a more unified approach to food system governance: participants in its public dialogues emphasised the need to 'include more formal arrangements for bringing government departments together to plan strategically for food issues on, for example environment, health and social support measures'. However as they currently stand the governance arrangements proposed look unlikely to address these requirements. The proposals are also silent on the requirement to connect England's food policy activities with that of the devolved nations – bar a recognition that the FSA's strong existing ties with Food Standards Scotland will enable a coherent UK-wide approach – despite their increasingly fragmented national food policy approaches (see Appendix for details on devolved administration food policies). Likewise, the report does not offer any measures to improve the connections between national food policy and local food policy activities.

What other policy implementation challenges might the NFS encounter?

Developing and publishing an excellent food plan is a vital first step, but how it is *implemented* will determine whether it is successful in its aims. As noted in the NFS, the Department for Environment, Food and Rural Affairs has committed to responding to the National Food Strategy with a White Paper within six months of publication, and invited NFS-lead Henry Dimbleby to review progress six months after that. A White Paper drafting team is in place in DEFRA, and is understood to be sharing evidence collected by the NFS team. One of the biggest questions regarding implementation is whether the government will accept the overall position taken in the Strategy. The position includes: how the problems are framed; who is deemed responsible for taking action; the kind of policy measures which should be utilised; and how the next stage of the policy development process should work (for example which government departments and other stakeholders should be involved in developing the White Paper). Whether the overall position is accepted is linked closely to whether, and who, will champion the project at political level. The FSA's arms-length design has advantages with regard to independence and prioritisation of consumer over commercial interests. But its lack of ministerial influence with other departments could be problematic. Lessons from previous and other country policies suggest another challenge will be potential for 'turf wars' over who is responsible for what. An example is responsibility for health-related actions, given the Department for Health and Social Care already has a Childhood Obesity Plan in place. There is the potential for historic tensions between the FSA and DHSC over nutrition policy to re-emerge if the FSA's remit is extended to encompass healthy and sustainable food advice. Finally, there is the challenge around resources; cross-cutting policy projects take time, and require dedicated resources, including a budget for delivery. The NFS is refreshingly open about the estimated costs of the measures it recommends, and prompts relevant departments to secure funds via the forthcoming spending review. The alternative, if the Treasury does not oblige, is departments contributing via their own already earmarked budgets, and the lessons from other national cross-cutting policies suggest this can be unpopular, and can undermine a cross-government approach.

Author Biographies

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APPENDIX: BACKGROUND EXPLAINER ON NATIONAL FOOD STRATEGIES

Why is the National Food Strategy for England and not the whole UK?

As noted in [Part I of the NFS](#), most policy related to food and health is the responsibility of the devolved administrations. Each of these countries has its own national food policy, either in development or already in existence, or both. These national food policies vary in types, from agri-food sector growth strategies, to more holistic policies on food. For example, Northern Ireland published a national policy on agri-food growth in 2017, and is currently in the process of developing a new national integrated food policy^{ix}. It is difficult to find out what the status of some of the policies is, because information is rarely provided on their implementation (for example, the Welsh 2010 policy).

Table 3: National food policies of the UK Devolved Administrations

Devolved Administration	Most recent national food policy	Date Published
Scotland	Good Food Nation ^x	2014
Wales	Food for Wales, Food from Wales ^{xi}	2010
Northern Ireland	Going for Growth ^{xii}	2017
Ireland	2030 Agri-Food Strategy ^{xiii}	2021

Source: Authors

Cross-cutting food strategies are also produced at [local government/city level](#)^{xiv}, and many cities around the UK, and across the world have their own local or urban food strategy. It is therefore important that national food policies acknowledge, and coordinate with, this local/city policy level.

Has England had a national food strategy before?

While the National Food Strategy 2020/21 is badged as the 'first food strategy for England for 75 years' there have been national food policies produced before. The most significant was a project spanning 2008-2010, to develop 'an overarching statement of government food policy', initiated in the Cabinet Office and finishing up in the Department for Environment, Food and Rural Affairs, with

the Food 2030 Vision report (see Table 2). The project was abandoned due to a change of government, and of political party, in 2010, soon after the publication of the Food 2030 Vision. Other reports, such as the 2002 'Curry Commission' report into the state of farming and food following the 2001 Foot and Mouth Outbreak, and the 2011 science-led *Foresight: The Future of Food and Farming*, from the Government Office for Science, were important policy projects but not overarching national food strategies.

Table 4: Previous national food policies in England

Food Policy	Lead Government Department	Details	Governance Bodies Established/Utilised
Food Matters: Towards a Strategy for the 21st Century (Published 2008)	Cabinet Office (Prime Minister's Strategy Unit)	<ul style="list-style-type: none"> 'Overarching statement of government food policy' which aimed to review main trends in food production and consumption; analyse implications for economy, society and environment; assess robustness of current policy framework for food Purposefully did not address food <i>production</i> Included proposals to integrate nutrition and sustainability advice for consumers, and to link health and sustainability through public procurement 	<ul style="list-style-type: none"> Food Strategy Task Force (civil service level group) Cabinet Sub-Committee on Food (ministerial level group, first since WW2) Joint research group for food Council of Food Policy Advisors Food Policy Unit within DEFRA
Food 2030 (Published 2010)	DEFRA	<ul style="list-style-type: none"> Subsequent phase of Food Matters project Responsibility passed to DEFRA Widened scope to cover health, environmental <i>and</i> production issues (theme of food security becomes prominent) Policy abandoned due to change in government from Labour to Conservative/Liberal Democrat in 2010 	

Source: Authors from [Parsons 2017](#)^{xv}

Do any other countries have national food strategies?

Along with the examples from around the UK listed in Table 1, several other countries in the world have an overarching national food policy. Some examples are listed in Table 3. Australia undertook a three-year project to develop a cross-cutting 'National Food Plan'^{xvi} between 2011- 2013, but the policy was shelved shortly after publication, following a change of government.

Table 5: Some examples of national food strategies in other countries

Country	Date Published	National Food Strategy/Policy	Governance Bodies Established/Utilised
Canada	2019	A Food Policy for Canada ^{xvii}	<ul style="list-style-type: none"> Canadian Food Policy Advisory Council^{xviii} (multidisciplinary group of stakeholders, selected to 'to bring diverse social, environmental, health and economic perspectives')
Finland	2016	Government report on Food Policy: Food 2030- Finnish food for us and the world ^{xix}	<ul style="list-style-type: none"> Food Policy Committee (seven ministries plus industry, trade and NGO representatives) Inter-ministerial group of Bio-economy Advisory Board of Food Chain (headed by the Ministry of Agriculture and Forestry)
Sweden	2017	A National Food Strategy for Sweden – more jobs and sustainable growth throughout the country ^{xx}	<ul style="list-style-type: none"> No details published

Source: Authors

Other countries have many food-related policies, and many of these have cross-cutting strategies on food, but focused more specifically on food security, food production, or obesity, not overarching policies addressing food-related issues as a whole.

Have the national food strategies which have been implemented been successful?

We can only really assess the published national food strategy report itself, because there is rarely any detail available on what happened after reports are published, including how the strategy was implemented, who did what, or what impact they had. It can also be difficult to work out which are new policy measures or activities, and which were already happening anyway but have been mentioned in the food strategy. In terms of how the reports themselves measure up, in several countries, the content has often fallen short on the balancing act between different objectives related to food, tipping too far towards the economic – such as a primary emphasis on increasing food industry productivity – without prioritising social challenges related to poor diets, or the environmental impacts of how we grow and eat. Often the projects are led by departments/ministries of agriculture, which can influence the focus of the overall policy, despite initial broad aims.

What governance bodies or other organisational arrangements have been used elsewhere?

As detailed in Tables 4 and 5, national food policy projects tend to involve the creation of new bodies, to support cross-government working across multiple departments^{xxi}. England's earlier food strategies led to several new initiatives, including: a cross-government task-force of civil servants; a cabinet-level sub-committee; a food policy advisory council; and a dedicated unit within DEFRA. Scotland's Good Food Nation policy utilised a temporary 'Commission' of independent advisors (but a decision was taken not to create a permanent body). Canada's national food policy team recently announced the creation of a widely-drawn multi-disciplinary advisory group, while Finland created a cross-ministerial group. Such initiatives are rarely the focus of research, and very little is known about how they work/ed, or their impact. Nevertheless, it seems reasonable to conclude that having some kind of organisational arrangement in place to support food policy coordination, share evidence, and take a holistic overview of the food system is likely to be beneficial. The food policy response to the covid-19 pandemic has highlighted the need for coordination, and led to [calls for new organisational arrangements around food](#), including for a minister for hunger and a legislative approach grounded in the Right to Food, to ensure hunger and health are prioritised.

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