



# FRC Food Policy Guidance Note

## Coordination must be key to how governments respond to Covid-19 food impacts: a view from England

### Summary

In this Guidance Note, we highlight the need for food policy to be coordinated across government – a need which predates but has been accentuated by the Covid-19 pandemic. Using England as an example, we show which parts of government are currently involved in making food policy that is relevant to the current crisis. **We propose a cross-government committee on the food system as a starting point, to take responsibility for coordinating food policy during the current pandemic and continuing into the renewal process and beyond.** Our proposal is based on an analysis which shows that:

- The food policy response to COVID-19 needs stronger coordination to effectively address issues of both supply and demand in the food chain and also address the multiple dimensions of the UK food system.
- No fewer than 16 departments are involved in some aspect of food policy in England, with roles and responsibilities across the food system, along with scores of agencies, public bodies and advisory groups.
- Each of these departments has a clear role to play in addressing COVID-19. Existing coordination mechanisms could be adapted or used as models to establish the cross-government committee now needed.

### Why this matters

COVID-19 continues to have multiple impacts along food supply chains, affecting food availability and access, farming and processing, the availability of food workers, cross-border trade, delivery systems and logistics, shopping habits and ultimately diets. This range of impacts illustrates a key characteristic of food issues: they are diverse, involving or affecting many different groups of people, in different places, engaged in different activities.

As a consequence, food issues form part of the remit of many different bits of government, from agriculture and health to business and education. Our research has shown that in England, at national level, at least 16 departments are involved in making decisions that affect the food system – with responsibility often further subdivided among agencies and arm's-length bodies.<sup>1</sup> No dedicated department, senior minister or overarching

framework exists to ensure all the different elements of food policy work together.

Part of the government's challenge, therefore, is to coordinate the objectives and activities of the

many officials and parts of government involved in deciding how the UK's food system copes with the crisis both now and into the future.

## What is policy coordination?

Policy coordination refers *both* to the process of connecting the different elements that have input into a policy – such as civil servants, government ministers, departments, agencies, advisory bodies or external stakeholders – *and* to the process of aligning their goals and plans. In general, policy coordination is necessary because without it:

- Confusion can arise over what the government's policy is;
- Policies can undermine each other or pull in opposite directions;
- Policies can duplicate each other;
- There can be missed opportunities for double benefits;
- Along with the desired outcomes, policies can have undesirable unforeseen consequences;
- Issues can fall through the cracks because departments or officials think someone else is responsible.

The Covid-19 pandemic is an unprecedented event in modern times, and it would have been unreasonable to expect any government to be fully prepared for its effects. But it has quickly become clear that better coordination among relevant parts of government would have strengthened the response to the Covid-19 food emergency in the short term. For example, it could have helped match supply and demand when restaurants and hotels were ordered to close, leaving huge volumes of food destined for the catering sector stranded without a use, especially since at the very same time, supermarket shelves were being emptied and many people found themselves without an income and unable to buy sufficient food. It could have avoided the anxiety that ensued when schools closed and children in receipt of Free School Meals were left without a vital source of nourishment. It

could have assured comprehensive assessment of where food was needed and by whom, and the development of the right package of measures to address these needs, by national government, Local Authorities, businesses and charities. And it could have averted the confusion over whether street markets and farmers' markets – important sources of fresh food for millions, and key outlets for thousands of farmers – could stay open safely.

At local level, voluntary organisations and businesses have jumped into action to plug the gaps, doing an admirable job of getting food to people who need it, and thereby keeping businesses trading and preventing waste. Catering wholesalers have converted themselves into box schemes, and restaurants have become grocery stores or takeaways. Trade associations and unions have established information hubs to help producers find markets or help traders stay open. Nationally, supermarkets are playing an important role in coordinating supply and demand, but they cannot do it alone; nor do they have a mandate to manage the entire sector. What is missing is a coordinated response from central government. Among other things, government coordination could ensure that:

- Sufficient quantities of nutritious food are made available to consumers on a fair basis;
- The multiple organisations currently coordinating efforts to match supply and demand at community level have the clarity and guidance they need;
- The UK's small-scale food businesses (many of which are financially precarious at the best of times), and the infrastructure they depend on, survive into the future;

- Government retains credibility as guardian of the nation's nutritional health and wellbeing.

While the need for coordination has been highlighted very strongly by the pandemic, it reflects the need for food planning more broadly, not just in the current emergency but in the 'recovery' period and over the longer term. This has happened before: during the first and second world wars, food committees and boards developed with the central goal of balancing food supply with demand and, particularly in the second world war, ensuring nutritional needs were met. In today's world, the needs and issues are more complex, including nutrition, health, food safety, climate change, biodiversity loss, food waste, livelihoods,

migration and more, so if anything the need for coordination is greater.

But it is not easy, because the food system has many different dimensions. To facilitate the process of improved coordination now and over the longer term, this Guidance Note draws on and adapts recent research by the Food Research Collaboration<sup>2</sup> to show who in national government needs to be part of this coordinated effort. Taking England as an example, it describes who is responsible for making which bits of food policy and thus who needs to talk to whom in order to achieve a coordinated policy response to the Covid-19 food emergency and beyond.

## Who makes food policy in England?

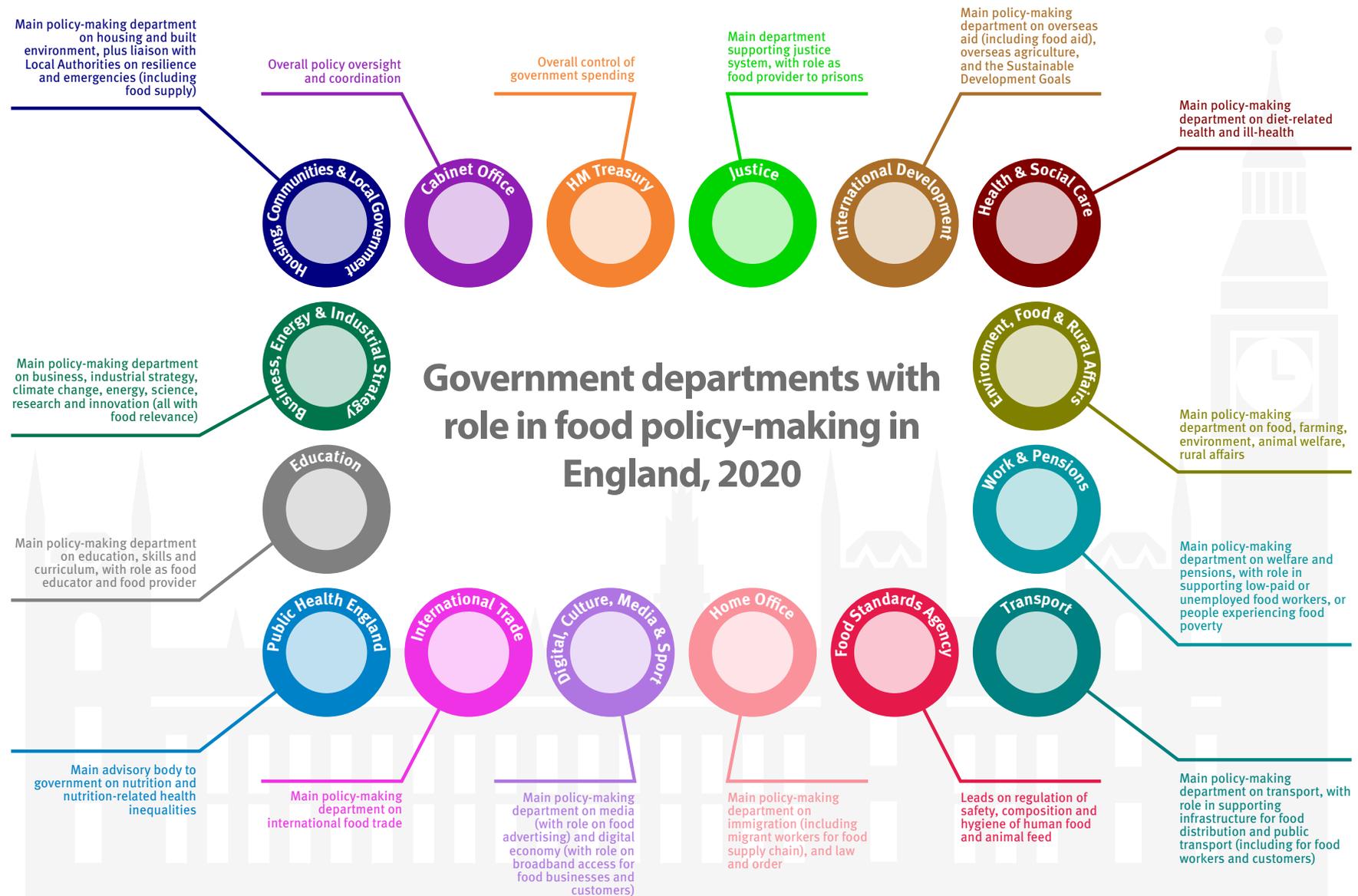
No fewer than 16 government departments and agencies currently have responsibility for making important decisions affecting food policy in England. Seven have key roles in making or delivering food policy; seven others have lesser roles which could become more important during COVID-19; one – the Treasury – has a vital underpinning role through its control of finances; and another – the Cabinet Office – could potentially play a strong role by coordinating policy (Figure 1).

To complicate the picture, in many departments, responsibilities are further split up among sub-divisions or handled by a variety of public bodies with different degrees of independence, answerable to the departments. These 'public bodies' – formally established organisations that are (at least in part) publically funded to deliver a government service, though not as a ministerial department – can be numerous. For example, the Department for Environment, Food and Rural Affairs (DEFRA), the UK's main department with responsibility for food and farming, works with more than 30 public bodies. This means that decision-making can be distributed across a great many different groups of officials – many of whom are at present working flat

out to solve problems related to Covid-19 in their own policy areas.

Not all of the government's food policy-making responsibilities will be relevant to the Covid food emergency. Table 1 looks at all the departments with food-related roles, and identifies some policy responsibilities which are likely to be affected by, or could contribute to, Covid food planning.<sup>3</sup>

Figure 1. Government departments with role in food policy-making in England, 2020



Source: Adapted from Parsons, K. (2020). *Who makes food policy in England? A map of governance actors and activities*. Rethinking Food Governance Report 1. London: Food Research Collaboration

**Table 1. Departments with food policy responsibility potentially relevant to Covid-19 response and recovery**

<b>Department / public body</b>	<b>Initials</b>	<b>Key role in relation to food</b>	<b>Policy responsibilities potentially relevant to Covid-19 response and recovery</b>
Cabinet Office	CO	Overall policy oversight and coordination	- Coordination of cross-government activity on Covid-19 and food
HM Treasury	HMT	Overall control of government spending	- Allocation of funding for emergency support payments to businesses, Local Authorities, voluntary sector (including the Coronavirus Job Retention Scheme, which allows employers to reclaim a portion of wages paid to 'furloughed' staff, via its non-ministerial department HMRC)
Department for the Environment, Food and Rural Affairs	DEFRA	Main policy making department on food, farming, environment, animal welfare, rural affairs	<ul style="list-style-type: none"> <li>- Agriculture policy, including decisions on food production and payments to farmers and fishers</li> <li>- Quality of food procured for public sector institutions (via Government Buying Standards for Food and Catering Services)</li> <li>- Food security, including Public Sector Security and Resilience Plan (sets out UK's resilience to specified risks: DEFRA contributes section on food as one of 13 Critical National Infrastructure Sectors)</li> <li>- Nutritional support to primary school children (School Milk and Fruit-and-Veg schemes)</li> <li>- Fisheries policy</li> <li>- Food waste (e.g. Emergency Surplus Food Grants help food aid organisations source food that would otherwise be wasted)</li> <li>- Food and Drink Sector Council: partnership between government and the food industry to boost employment and productivity (in conjunction with BEIS)</li> <li>- Systems Research Programme: cross-disciplinary programme with academic advisers led by Chief Scientific Adviser taking a 'systems mapping' approach to assess policy coherence on environmental issues</li> <li>- National Food Strategy: year-long review of food system (now paused), intended to inform a proposed overarching food strategy</li> <li>- Animal welfare regulations (protect animals on farms, in transit, at slaughter)</li> </ul>
Food Standards Agency (non-ministerial government department)	FSA	Leads on regulation of safety, composition and hygiene of human food and animal feed	<ul style="list-style-type: none"> <li>- Oversight of food and feed regulatory matters</li> <li>- Support and guidance for Local Authorities (which enforce many of the regulations for food producers, food processors, catering establishments, takeaway and food delivery, retailers and dairy establishments)</li> <li>- Food crime</li> <li>- Scientific advice on various aspects of food and feed safety</li> <li>- Food and You consumer survey (tracks consumer experience of food system)</li> </ul>

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Department for Health and Social Care	DHSC	Main policy-making department for diet-related health and ill-health	<ul style="list-style-type: none"> <li>- Policy on diet-related health and ill-health</li> <li>- Childhood Obesity Plan (COP) – range of measures to reduce childhood obesity and support improved nutrition for children, including by improving nutritional content of processed foods, controlling advertising of unhealthy foods to children, improving nutritional content of school meals, and taxing sugary drinks. Cross-departmental coordinating mechanisms in place to deliver COP</li> <li>- National Health Service food provision</li> <li>- Support for children’s nutrition via Healthy Start Vouchers (provide low-income parents with an allowance to buy certain fresh foods) and vitamins</li> <li>- Prescribing nutritional component of Government Buying Standards for Food and Catering Services</li> </ul>
Public Health England (executive agency of DHSC) and Chief Medical Officer (independent advisor to government)	PHE CMO	Main advisory body to government on nutrition and nutrition-related health inequalities	<ul style="list-style-type: none"> <li>- Provision of nutritional advice to all other branches of government, Local Authorities, industry and the public, including via public health campaigns</li> <li>- Promotion of the national dietary guidelines (the Eatwell Guide)</li> <li>- Provision of information on diet-related health inequalities and how to reduce them</li> <li>- Advice on nutrition during public health emergencies</li> <li>- CMO: independent adviser to the government on health and diet-related matters</li> </ul>
Department for International Development	DFID	Main policy-making department on overseas aid (including food aid), overseas agriculture, and the Sustainable Development Goals	<ul style="list-style-type: none"> <li>- Response to humanitarian crises, including food shortages and famines (non-UK)</li> <li>- Support for agriculture and nutrition (non-UK)</li> <li>- Promotion of and support for SDGs (including on food and hunger)</li> </ul>
Department for Business, Energy and Industrial Strategy	BEIS	Main policy-making department on business, industrial strategy, climate change, energy, science, research and innovation (all with food relevance)	<ul style="list-style-type: none"> <li>- Industrial strategy (food is the UK’s largest manufacturing sector)</li> <li>- Policy for food businesses (including small and medium-sized businesses)</li> <li>- National Living Wage</li> <li>- Groceries Code Adjudicator (regulates the relationship between major food retailers and their main suppliers)</li> <li>- Competition regulation</li> <li>- Government Office for Science (leads government’s team of scientific advisers, including those working on food or health)</li> <li>- Food and Drink Sector Council (see above, in conjunction with DEFRA)</li> <li>- Sector Deal for Food and Drink Manufacturing (partnership between the government and industry to tackle food-sector-specific issues)</li> <li>- Local Enterprise Partnerships (with MHCLG) – local partnerships between public authorities and private businesses to support economic growth and job creation, including in food sector</li> <li>- Climate Change Committee (advises government on steps needed to meet emission reduction targets, including in food sector)</li> <li>- Clean Growth Strategy (sets out plans for cutting emissions, including from food sector)</li> </ul>

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Department for Education	DfE	Main policy-making department on education, skills and curriculum, with role as food educator and food provider	<ul style="list-style-type: none"> <li>- Nutritional standards for food served in schools</li> <li>- Free School Meals and support for school breakfast programmes / holiday meals</li> <li>- School Fruit and Vegetable Scheme (provides free piece of fruit or veg daily to every 4-6 year old in a state school) (jointly with DH)</li> <li>- Nursery Milk Scheme (provides 1/3 pint milk daily to under-5s in approved daycare) (jointly with DHSC)</li> <li>- Food in the curriculum</li> <li>- Apprenticeships in food sector</li> </ul>
Department for Digital, Culture, Media and Sport	DCMS	Main policy-making department on media (with role on food advertising) and digital economy (with role on broadband access for food businesses and customers)	<ul style="list-style-type: none"> <li>- Ofcom (independent communications regulator) – covers food advertising and restrictions on food advertising to children</li> <li>- Rural connectivity (including access to internet for food businesses and for citizens seeking food or food-related information)</li> </ul>
Department for International Trade	DIT	Main policy-making department on international food trade	<ul style="list-style-type: none"> <li>- Trade in food, feed, agricultural inputs and industrial food ingredients</li> <li>- Trade Agreements covering food to be negotiated as UK exits EU</li> </ul>
Department for Transport	DT	Main policy-making department on transport, with role in supporting infrastructure for food distribution and public transport (including for food workers and customers)	<ul style="list-style-type: none"> <li>- Infrastructure supporting food distribution (roads, rail, ports)</li> <li>- Guidance to Local Authorities running public transport networks (for food workers and to access food shops)</li> </ul>
Department for Work and Pensions	DWP	Main policy-making department on welfare and pensions, with role in supporting low-paid or unemployed food workers, or people experiencing food poverty	<ul style="list-style-type: none"> <li>- Welfare payments (including Universal Credit)</li> <li>- Health and safety in the workplace</li> </ul>
Home Office	HO	Main policy-making department on immigration (including migrant workers for food supply chain), and law and order	<ul style="list-style-type: none"> <li>- Availability of migrant labour for food production</li> <li>- Worker exploitation in food sector (via its agency the Gangmasters and Labour Abuse Authority)</li> <li>- Maintenance of order in the event of food shortages</li> </ul>
Ministry of Justice	MoJ	Main department supporting justice system, with role as food provider to prisons	<ul style="list-style-type: none"> <li>- Stability of food supplies to prisons</li> <li>- Nutritional quality of food served in prisons</li> </ul>
Ministry of Housing, Communities and Local Government	MHCLG	Main policy-making department on housing and built environment, plus liaison with Local Authorities on resilience and emergencies (including food supply)	<ul style="list-style-type: none"> <li>- Emergencies and Resilience Division works with Local Authorities and Local Resilience Forums, and connects national and local activities around emergencies (e.g. distribution of food parcels to individuals identified as being at acute risk during Covid-19)</li> <li>- Urban regeneration / high streets (affected by Covid-related closures)</li> <li>- Local industrial strategy (including for food businesses)</li> </ul>

Source: Adapted from Parsons, K. (2020). *Who makes food policy in England? A map of government actors and activities*. Rethinking Food Governance Report 1. London: Food Research Collaboration.

## Mechanisms for coordinating food policy

With so many departments, divisions and bodies involved, the government has developed a range of formal and informal mechanisms to coordinate activities. The current crisis, which is having acute short-term effects and will also have long-term impacts on the UK's food system, seems to demand a fairly strong, formal coordinating mechanism to support both crisis management and the recovery and regeneration that must follow.

In the past, various coordinating bodies (often referred to as taskforces, committees or units) have been set up to allow relevant expertise to be brought together from across government and with the involvement of external stakeholders, to focus either on a specific policy problem or to take a broad view of food policy as a whole. They have had different levels of seniority and varying degrees of cohesion.<sup>4</sup>

For example the team brought together by the then Prime Minister in 2007 to conduct a wide-ranging review of food policy involved civil servants and external experts, and was based in the Cabinet Office, which was seen to give it more clout than if it had been based in DEFRA; it led to the 2008 document *Food Matters*. The Childhood Obesity Plan, hailed as a successful current example of coordinated policy making, is led by DHSC, though its policies involve action by other departments, including DCMS, the Treasury and DfE, as well as by the food industry; it is supported by the Childhood Obesity Plan Delivery group. The National Food Strategy project initiated by the last government (and now interrupted by the Covid-19 crisis) involves a review of the food system which is being conducted by a team of experts from agriculture, industry, civil society and academia, and is led by a Defra 'non-executive' board member: it will inform a National Food Strategy that will now undoubtedly have to be redesigned to take Covid's effects and lessons into account.

These examples provide models for coordination in food policy making, and it is likely that some form

of taskforce or committee, with high-level backing, could alleviate some of the uncoordinated policy developments witnessed in recent weeks and avert others.

In the longer term, an additional form of coordination can continue to be provided by Parliament, via the various committees either tasked with scrutiny (such as the Select Committees) or organised by Parliamentarians to focus attention on specific issues (such as the All Party Parliamentary Groups, APPGs). These Parliamentary bodies can take evidence or invite participation from a wide range of sources, thus highlighting gaps or duplication in the way departments are tackling issues.

The Environment, Food and Rural Affairs Select Committee (whose remit is to scrutinize the work of DEFRA) has already announced an inquiry into the pandemic's effects on the food supply, and several other departments have announced their own plans for inquiries. But a separate scrutiny committee may now be called for, along the lines of the Environmental Audit Committee (EAC), which (unlike most Select Committees) is not tied to looking at the work of a single department but is tasked instead with considering how the policies and programmes of the whole government affect a single issue. In the case of EAC, this issue is the environment, but the government's response to Covid could form the remit of a new committee.

Several APPGs focus on aspects of food (including agroecology, the food and drink industry, food and health, and school food), so it is highly likely that Covid's effects will be discussed – or a new APPG on food and Covid could be set up.

## Conclusions

Never in recent British history has it been more evident that a coordinated approach to food policy is needed. Whatever the trajectory of the pandemic, the level of disruption already caused means that the Covid-19 crisis will continue to affect the production, distribution and consumption of food in the UK for months to come.

A coordinating mechanism for food policy is needed, based on or adapting the models described above. **A cross-government committee on the food system would be a starting point, to coordinate policy during the crisis and continue into the renewal process and beyond.** The lessons of the past are that it should have senior backing, ideally from the Prime Minister, so that its proposals carry weight; be given a wide

remit and enough resources to fulfil it; liaise closely with the Devolved Administrations; and include cross-cutting expertise from within the civil service, from academia, and from civil society and (small as well as big) business, where many policy decisions are currently being taken by default, in the absence of central coordination.

In the short term, better policy coordination will boost the effectiveness of the government's response, and rebuild trust. In the longer term, it could lay the foundation for a more resilient food system, meeting goals on health, fairness, environmental sustainability and economic diversity – and better able to withstand shocks like the current one.

## Notes

- 1 Parsons, K. (2020). *Who makes food policy in England? A map of government actors and activities*. Rethinking Food Governance Report 1. London: Food Research Collaboration.
- 2 Rethinking Food Governance reports are / will be available at <https://foodresearch.org.uk/workstream-2/>
- 3 This table takes a framework developed in the FRC series Rethinking Food Governance and applies it to the policy challenge of Covid-19. See Parsons, K. (2020). *Who makes food policy in England? A map of government actors and activities*. Rethinking Food Governance Report 1. London: Food Research Collaboration.
- 4 Parsons, K. (forthcoming): Rethinking Food Governance reports are / will be available at <https://foodresearch.org.uk/workstream-2/>

This Guidance Note is based on the FRC report [Who makes food policy in England? A map of government actors and activities?](#), by Kelly Parsons, where full references for the content can be found. It is part of the FRC series Rethinking Food Governance.

Rethinking Food Governance papers are free to download from:  
[foodresearch.org.uk/workstream-2](http://foodresearch.org.uk/workstream-2)

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