

# Rethinking Food Governance 1

## Who makes food policy in England?

A map of government actors and activities

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May 2020

**Series Editor**  
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**FOOD RESEARCH  
COLLABORATION**

an initiative of the

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Food Policy**

Educating, researching & influencing  
for integrated and inclusive food policy

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# Abbreviations

AHDB	Agriculture and Horticulture Development Board
AMR	Antimicrobial Resistance
ASA	Advertising Standards Authority
ASC	Adaptation Sub-Committee
BBSRC	Biotechnology and Biological Sciences Research Council
BEIS	Department for Business, Energy and Industrial Strategy
BIS	Department for Business, Innovation and Skills
BRC	British Retail Consortium
CAP	Common Agricultural Policy
CCC	Committee on Climate Change
CCRA	Climate Change Risk Assessment
CMO	Chief Medical Officer
COP	Childhood Obesity Plan
CSA	Chief Scientific Advisor
DA	Devolved Administration
DAERA	Department of Agriculture, Environment and Rural Affairs
DCMS	Department for Digital, Culture, Media and Sport
DECC	Department of Energy and Climate Change

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DEFRA	Department for Environment Food and Rural Affairs
DEXEU	Department for Exiting the European Union
DfE	Department for Education
DFID	Department for International Development
DHSC	Department of Health and Social Care
DIT	Department for International Trade
EFSA	European Food Safety Authority
EHO	Environmental Health Officer
EU	European Union
FCO	Foreign and Commonwealth Office
FDF	Food and Drink Federation
FRC	Food Research Collaboration
FSA	Food Standards Agency
FSS	Food Standards Scotland
GBSF	Government Buying Standards for Food and Catering Services
GCA	Groceries Code Adjudicator
GCSA	Government Chief Scientific Advisor
GI	Geographical Indication
HFSS	High Fat Sugar and Salt
HMT	HM Treasury
HMRC	Her Majesty's Revenue and Customs
HO	Home Office
HSE	Health and Safety Executive
LA	Local Authority
LGA	Local Government Association
MHCLG	Ministry of Housing, Communities and Local Government
MOU	Memorandum of Understanding
NAO	National Audit Office
NEBMs	Non-executive board members
NHS	National Health Service
NFU	National Farmers Union
NICE	National Institute for Health and Care Excellence
PHE	Public Health England
RCPU	Rural Communities Policy Unit
RDA	Rural Development Agency
RDPE	Rural Development Programme for England
RPA	Rural Payments Agency
SACN	Scientific Advisory Committee on Nutrition
SDC	Sustainable Development Commission
SDGs	Sustainable Development Goals
SDIL	Soft Drinks Industry Levy
SoS	Secretary of State
UKFSA	UK Food Security Assessment
UKRI	UK Research & Innovation
WSA	Whole Systems Approach



## Introduction

This report provides the first detailed overview of the government's involvement in, and responsibility for, food policy in England. It identifies the key departments, roles and public bodies; describes their size and structure; sets out their goals and responsibilities; describes their key activities in relation to food; and notes their relationships to Local Authorities and Devolved Administrations. It takes as its definition of food policy 'all the policies which influence the food system and what people eat'<sup>1</sup>, viewing food as 'an interconnected system of everything and everybody that influences, and is influenced by, the activities involved in bringing food from farm to fork'<sup>2</sup>. It thus views food policy-making as inherently complex, with the expectation that it is spread across government and operates at multiple levels. Yet despite the complexity of this system of what can be termed 'food governance', it recognises that food policy is made and implemented every day, and can be clearly identified.

A 'map' like this is an essential first step in understanding how food policy is shaped and conducted by governments and how it can become better connected. It shows how authorities divide up and tackle food-related policy challenges, and lays the foundation upon which a holistic, food systems approach to policy can be built. The ability of food policy to do its job is affected by how connected and coherent a government's policies are (Box 1). Without this information, it is difficult for actors inside or outside government to view the full range of policies, understand how they interact, or spot opportunities and levers for policy change.

The information is drawn from a wide range of public documents, supplemented by a series of in-depth interviews with senior stakeholders with experience of food policy-making. By collecting this information in one place, the report provides

civil society organisations and researchers with what they need to know in order to understand and influence food policy in England, as well as providing insights for governments about who is doing what on food. It also provides a model for other countries and jurisdictions to undertake the same process.

## Scope and methods

The process of decision-making by national governments is one element in the broader picture of 'food governance'. This report focuses on food policy-making conducted by national government (as distinct from private sector or civil society actors) in England. It identifies:

- The key governance 'actors' – the bodies which play a role in making and delivering food-related policy;
- The key governance 'activities' such as laws, regulations and policies.

The data was collected in 2019, providing a snapshot of the governance arrangements in place at that time.

There are few examples of research that describes how food policy is made in a particular country or city. The methods used here drew on a framework developed by the author to map the UK food policy system and its potential for a more integrated approach<sup>3</sup>. The methods were also inspired by an exercise undertaken by the UK Sustainable Development Commission (SDC) in 2008, to identify the key food-related responsibilities of each department in Westminster<sup>4</sup>.

The report focuses on seven key departments – the Department for the Environment, Food and Rural Affairs; the Food Standards Agency; the Department of Health and Social Care; Public Health England;

**Box 1. Mapping food policy across governments: an essential first step in taking a systems approach to food**

Food is increasingly understood as ‘an interconnected system of everything and everybody that influences, and is influenced by, the activities involved in bringing food from farm to fork’<sup>5</sup>. The food system involves economic, environmental, health, social and political dimensions. Major challenges such as obesity or climate change are seen to be systemic in that their causes and outcomes are complex and interconnected, spanning several policy areas.

Fragmentation can lead to policies that lack coherence, or even undermine each other. For example, agriculture policy might subsidise the kind of farming that causes high greenhouse gas emissions, which climate policy is trying to reduce. Or policies that aim to reduce the intake of high-calorie, fatty, sugary and salty foods may have a negative impact on the economic viability of food businesses<sup>6</sup>. Without taking ‘policy coherence’ into account, policies may overlook these contradictions or – equally important – miss opportunities to support other policy goals<sup>7</sup>. Another risk is that important issues simply ‘fall through the cracks’ between policy sectors if it is not clear which part of government is responsible for them<sup>8</sup>. Clearly, there are opportunities for improving policy if duplications and contradictions can be eliminated, and potential ‘win-wins’ identified. This is where a systems approach helps.

A systems approach to food policy requires examining how connected and coherent a government’s policies are. It involves considering how policy-making processes operate, including the bodies which are involved and how well they work with one another. It requires identifying where there are disconnects or contradictions between policies or issues, and assessing any new policy interventions for their effects on government goals elsewhere, to ensure policies work in the most effective way possible. To do this kind of ‘coherence analysis’ in a particular country or city requires establishing, as a first step, the bodies responsible for food policy-making and the range of policies related to food. That is what this report does for England. Subsequent reports will map policy connections.

the Department for International Development; the Department for Business, Energy and Industrial Strategy; and the Department for Education – with a shorter discussion of other departments with a more secondary role. The many government bodies discussed are mainly referred to by their initials, explained in the list of abbreviations on pages 4-5.

Two main methods to collect data were employed:

a desk-based analysis of a wide range of documents; and semi-structured interviews with a range of stakeholders with a close experience of food policy-making in England.

The documentary analysis used a template to guide the research and ensure information was collected consistently. Using this template, for each department, the research looked at:

- Official areas of policy responsibility and goals
- Key food-related laws/policies/strategies/projects
- Organisational structure and governance
- Evidence of links with Devolved Administrations and local government
- Anticipated changes due to Brexit.

Sources included departmental websites; annual reports; strategic plans; press releases; Select Committee reports and evidence submissions; National Audit Office reports; consultation responses; and reports from external organisations. The research also drew on media coverage, including on Brexit-related developments.

The documentary analysis was supplemented by 23 qualitative interviews with stakeholders from within and outside government. Table 1 lists the interviewees by type. All interviews were conducted on an anonymous basis, with interviewees identified in the text by number.

**Table 1. Interviewees, by type (n=23)**

Interviewee Type	Sample
Civil servants from government departments	13
Civil society	4
Food industry	3
Other	Academic x 1 Food policy consultant x 1 MP x 1

Source: Author

It should be noted that the map is not exhaustive. It was not possible to interview representatives from all divisions of departments, so the picture may be partial. Interviewees often commented that there could be activities elsewhere in the department that they were not aware of. Equally, there is a possibility that policies discussed here are no longer being actively worked on. Finally, it is true that taken to the extreme, every policy area can be traced to an influence on the food system. For this report, judgements on which activities had significance for food were based on the author's knowledge of food policy. The map was re-visited throughout the research process, when new activities were uncovered which were deemed relevant.

Conducting the mapping exercise has confirmed that in England (as in the majority of countries and cities) there is no single place to go to find out about food-related policy, either for those inside or outside government<sup>9</sup>. There is no national food policy, or ministry of food, which draws all of the threads together. Likewise, there is no single 'nutrition policy' or 'agriculture policy' for which a specific department is responsible: agriculture policy, for example, is a collection of different policy measures (such as subsidies and agricultural technology support), which are not collated in one place. At national level, Departmental Plans (in which departments set out their objectives and

say how they will achieve them) may not include all policies, but focus on the most current projects. In order to compile this map, it was necessary to consult a range of documents and then conduct interviews with stakeholders to fill gaps.

Food policy-making is thus not only dispersed, but can also be opaque. In England, for example, the streamlining of departmental annual reports and the use of an aggregated government website (gov.uk) makes it difficult to identify information<sup>10</sup>. Where policies are listed on government websites, it is often unclear whether they are 'live' or defunct, or what activities are happening as a result of them. In addition, food policy is constantly changing, making such maps prone to being outdated quickly.

Based on the experience of compiling this report, it is therefore our recommendation that a government department be assigned responsibility for providing and updating a 'food policy map'. This would support more coherent policy-making by the government itself; and would make it easier for others to engage constructively with food policy-making. The following sections set out the departments and bodies involved in food policy-making in England, and the policies they are responsible for, using the methods described in the Introduction. These arrangements are summarised in Fig. 1 (overleaf).



Photo by Jordhan Madec on Unsplash



Figure 1. Government responsibilities for food policy-making in England.



Source: Parsons, K. (2020). Who makes Food Policy in England? A map of government actors and activities. Food Research Collaboration.



# Department for Environment, Food and Rural Affairs

The Department for Environment, Food and Rural Affairs (DEFRA) is the main department with a role in food policy. DEFRA is what might be described as a ‘super ministry’<sup>11</sup>, in that it combines multiple policy areas: food, farming, environment and rural. It is responsible for ‘safeguarding our natural environment, supporting our world-leading food and farming industry, and sustaining a thriving rural economy’, and describes its broad remit as playing ‘a major role in people’s day-to-day life, from the food we eat, and the air we breathe, to the water we drink’<sup>12</sup>.

## Goals

DEFRA’s stated goals are to:

- unleash the economic potential of food and farming, nature and the countryside
- champion the environment
- provide security against floods, animal and plant diseases and other hazards<sup>13</sup>.

## Policy responsibilities

In practice DEFRA’s work spans a huge range of responsibilities, from access to the countryside and animal and plant health at one end to water quality at the other.

## Main food-related policy areas and activities

- Agriculture (including subsidy payments)
- Fisheries
- Climate Change Adaptation
- Soils and Forests
- Water
- Animal Welfare
- Food Waste
- Parts of food labelling
- Geographical Indications marketing scheme
- Public Food Procurement
- Food Security (in the context of National Security and Resilience)
- Biofuels.

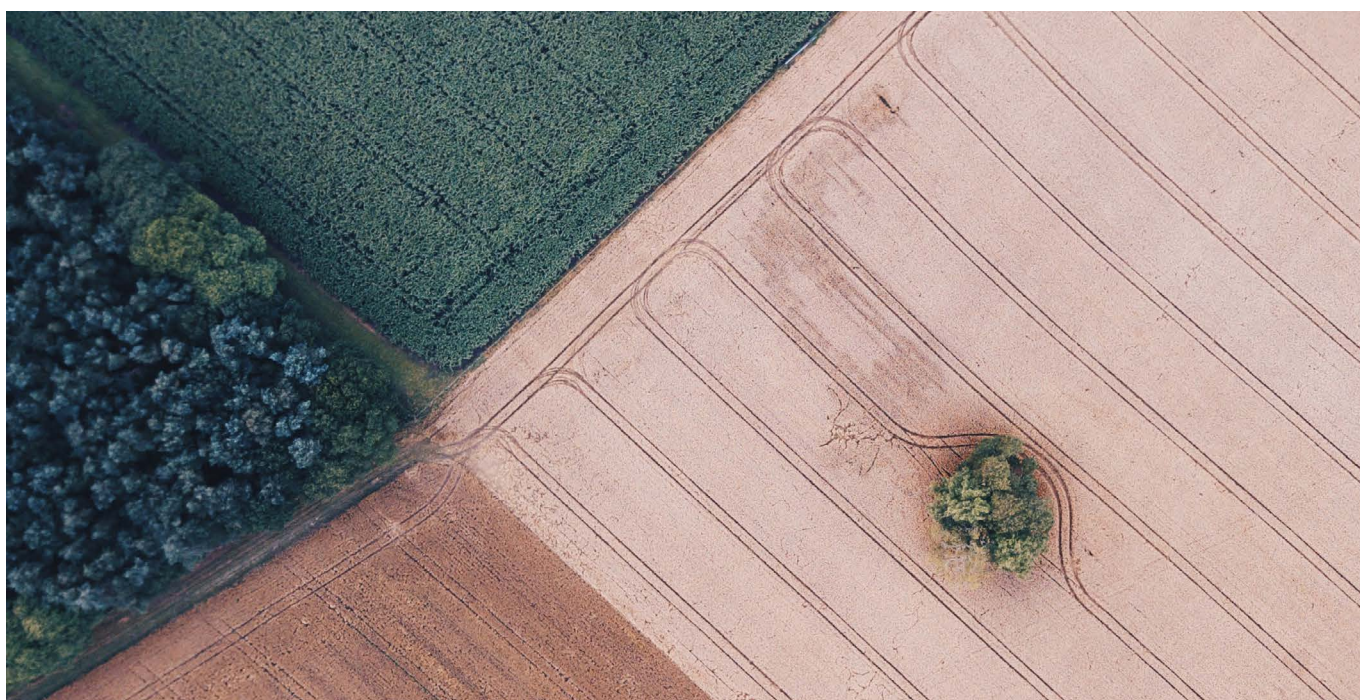


Photo by Peter Ford on Unsplash

**Table 2. DEFRA: Main food-related policy activities**

(Post-Brexit, the food-related activities of the department will change, but arrangements were unclear at the time of publication)

Policy Area	Policy Activity	Details
Agriculture	EU Common Agricultural Policy	<ul style="list-style-type: none"> <li>- Responsible for administering the EU Common Agricultural Policy (CAP) – a system of agricultural subsidies and programmes covering farming, environmental measures and rural development</li> <li>- Includes the CAP (Pillar 1) Basic Payments Scheme (direct payments to support the farming industry); and CAP (Pillar 2) Rural Development Programme (see below)</li> <li>- Both paid via executive agency the Rural Payments Agency</li> </ul>
	Rural Development Programme for England	<p>Funding scheme to:</p> <ul style="list-style-type: none"> <li>- Improve the environment</li> <li>- Increase productivity of farming and forestry</li> <li>- Grow the rural economy</li> </ul> <p>The RDPE is made up of four elements:</p> <ul style="list-style-type: none"> <li>- Countryside Stewardship</li> <li>- Countryside Productivity</li> <li>- Growth Programme</li> <li>- LEADER<sup>14</sup></li> </ul>
Agriculture	Health and Harmony: the future of food, farming and the environment in a Green Brexit	<ul style="list-style-type: none"> <li>- Consultation paper (February 2018) setting out proposals for future farming in England following EU Exit</li> <li>- Received over 40,000 responses<sup>15</sup></li> </ul>
	Agriculture Bill (as proposed prior to 2019 General Election)	<ul style="list-style-type: none"> <li>- Will provide the legal framework for UK to leave the CAP</li> <li>- Proposes new financial assistance powers to pay public money for public goods</li> <li>- Existing farm subsidies (in the form of direct payments to farmers) to be phased out over a transition period</li> <li>- Legislates to strengthen data collection powers and other measures to support the position of farmers in the supply chain and to support animal and plant health<sup>16</sup></li> </ul>
	Agri-Tech Strategy and Catalyst Funding	<ul style="list-style-type: none"> <li>- Strategy and funding to support the UK to become a ‘world leader’ in agricultural technology<sup>17</sup>.</li> <li>- Continuing rounds of Agritech Catalyst Funding.<sup>18</sup></li> <li>- Includes Agri-Food Technology Leadership Council of industry representatives and academics</li> </ul>
Fisheries	Fishing (Access to Territorial Waters) Bill	<ul style="list-style-type: none"> <li>- Covers control of access to UK waters and fishing quotas once UK has left the EU</li> <li>- Consultation document published in July 2018<sup>19</sup>.</li> </ul>
	EU Common Fisheries Policy	<ul style="list-style-type: none"> <li>- Implementation and enforcement of the Common Fisheries Policy (CFP), including management and policing of fishing quotas and landing obligation (discard ban) and funding</li> <li>- Negotiation of fishing quotas with EU Fisheries Council</li> <li>- Via non-executive body the Marine Management Organisation</li> </ul>

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Environment	Environmental Principles and Governance Bill	<ul style="list-style-type: none"> <li>- Will create a new independent environmental watchdog to hold government to account on environmental ambitions and obligations once the UK has left the EU<sup>20</sup></li> </ul>
	25-Year Environment Plan	<ul style="list-style-type: none"> <li>- Sets out government action to ‘help the natural world regain and retain good health’</li> <li>- Aims to ‘deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats’</li> <li>- Calls for ‘an approach to agriculture, forestry, land use and fishing that puts the environment first’<sup>21</sup></li> <li>- Aims to increase and improve management of the seas; ensure productive and extensive seafloor habitats which can support healthy, sustainable ecosystems; and recover and maintain fish stocks at levels that can produce their maximum sustainable yield<sup>22</sup></li> </ul>
	Adaptation Sub-Committee	<ul style="list-style-type: none"> <li>- Part of the Committee on Climate Change (CCC, see below)</li> <li>- Established under the Climate Change Act 2008 to support the CCC in advising and reporting on progress in adaptation</li> <li>- Jointly sponsored by DEFRA, the Northern Ireland Executive, the Scottish government and the Welsh government</li> </ul>
	Climate Change Risk Assessment	<ul style="list-style-type: none"> <li>- Forms part of five-yearly cycle of requirements laid down in Climate Change Act 2008<sup>23</sup></li> <li>- First published in 2012; second in 2017</li> <li>- Top six groups of risks identified could all be connected to food<sup>24</sup></li> </ul>
	National Adaptation Programme	<ul style="list-style-type: none"> <li>- Sets out government’s response to the second Climate Change Risk Assessment, showing the actions government is planning and taking</li> <li>- Outlines risks to domestic and international food production and trade, and proposes remedies such as ensuring a food supply chain which is resilient to the effects of a changing climate, and reviewing and publishing an updated UK Food Security Assessment<sup>25</sup></li> </ul>
	Marine Conservation Zones	<ul style="list-style-type: none"> <li>- Areas that protect a range of nationally important, rare or threatened habitats and species</li> <li>- First 27 zones designated in 2013; 23 sites in the second phase in 2016; and 41 sites and 12 additional features designated in May 2019<sup>26</sup></li> </ul>
	Resources and Waste Strategy	<p>Links to 25-Year Environment Plan pledge to leave environment in a better condition for the next generation. Includes food-relevant proposals to:</p> <ul style="list-style-type: none"> <li>- Extend producer responsibility for packaging</li> <li>- Tax plastic packaging with less than 30% recycled plastic</li> <li>- Provide consumers with better information on the sustainability of their purchases</li> <li>- Ban plastic products where there is a clear case for it and alternatives exist</li> <li>- Improve recycling rates</li> <li>- Increase food waste collection</li> <li>- Create a Joint Unit for Waste Crime</li> <li>- More effectively redistribute food to those who need it most before it can go to waste</li> <li>- Consult on annual reporting of food surplus and waste by food businesses</li> <li>- Consult on legal powers to introduce food waste targets and surplus food redistribution obligations</li> <li>- Publish a new food surplus and waste hierarchy</li> <li>- Promote awareness of the issue by appointing a new food waste champion</li> <li>- Support cross-sector collaboration through the Courtauld 2025 voluntary agreement to cut the carbon, water and waste associated with food &amp; drink<sup>27</sup></li> </ul>
	Microbead Ban	<ul style="list-style-type: none"> <li>- Ban on sale of products including microbeads introduced in 2018 (in part to prevent them from entering human and other animal food chains)</li> </ul>
	Restricting plastic drinking straws, stirrers and cotton buds	<ul style="list-style-type: none"> <li>- Consultation took place in 2018 on ban on distribution or sale of these single-use items</li> <li>- Ban due to come into force in 2020</li> <li>- Follows 5p plastic bag charge introduced in 2015</li> </ul>
	Forests and Soils Guidelines	<ul style="list-style-type: none"> <li>- In England, DEFRA is responsible for setting policy on forests and soils which includes rules and funding under the Common Agricultural Policy (see above); the UK Forestry Standard’s Forests and Soils Guidelines; and Farming Rules for Water. Soils in the wider and urban environment are considered in the National Planning Policy Framework<sup>28</sup>. DEFRA’s executive agency, the Forestry Commission England, is responsible for delivery<sup>29</sup>.</li> </ul>

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Food Security	Public Sector Security and Resilience Plan	<ul style="list-style-type: none"> <li>- Sets out the resilience of the UK's most important infrastructure to the relevant risks identified in the National Risk Assessment (the regular review of risks conducted by the government). Produced annually, resilience plans are placed before ministers to alert them to any perceived vulnerabilities, with a programme of measures to improve resilience where necessary. Short summaries of the plans are published</li> <li>- DEFRA contributes a section on food as one of 13 'Critical National Infrastructure Sectors'<sup>30</sup></li> <li>- The 2018 Public Sector Security and Resilience Plan states that 'DEFRA has commenced a review of the UK Food Security Assessment (UKFSA, last published in 2010), to update and refresh the suite of indicators within it'<sup>31</sup></li> <li>- The UKFSA is due for publication and 'climate change will be considered and highlighted as a risk (and possible opportunity) throughout the review' according to the National Adaptation Programme<sup>32</sup></li> </ul>
	Government Buying Standards	<ul style="list-style-type: none"> <li>- DEFRA is responsible for overseeing public procurement of food and catering services</li> <li>- In recent years its programme of work has included building and implementing a 'balanced scorecard' for procurement in the public sector, which includes price, production, health and wellbeing, resource efficiency, socio-economic factors and quality of service<sup>33</sup></li> <li>- All central government departments and their agencies are required to comply with the Government Buying Standards for Food and Catering Services (GBSF) as well as prisons, the armed forces, and the NHS. Schools must follow the school food standards legislation (see below) but may choose to use the GBSF too. The wider public sector is also encouraged to apply these standards, including to food and drink offered in vending machines (for example in leisure centres)<sup>34</sup>.</li> </ul>
Food	School Milk and Fruit & Veg Schemes	<ul style="list-style-type: none"> <li>- Scheme to support the distribution of free fruit, vegetables and milk to schools across the European Union<sup>35</sup></li> <li>- The Rural Payments Agency administers the scheme on behalf of Defra</li> </ul>
	Food Innovation Network	<ul style="list-style-type: none"> <li>- DEFRA-sponsored 'virtual community' of organisations (co-sponsored by the Biotechnology and Biological Sciences Research Council)</li> <li>- Aims to 'make food innovation ideas a reality', fuel business growth, form new partnerships and 'help improve the competitiveness of food and drink businesses right across the supply chain'<sup>36</sup>.</li> </ul>
	Food and Drink Sector Council	<ul style="list-style-type: none"> <li>- Partnership between government and the food industry, with the aim of a creating more productive and sustainable food and drink sector</li> <li>- Members from all sections of food supply chain</li> <li>- Secretariat supported by the DEFRA Industrial Strategy Team</li> </ul>
	Geographical Indications	<ul style="list-style-type: none"> <li>- Adapting existing EU GI schemes (intellectual property protections that identify products as originating in a country, region or locality) to establish UK GI schemes post-Brexit</li> <li>- Currently apply to 86 UK products including: Scotch Whisky; Scottish Farmed Salmon; Welsh Lamb and Beef; Stilton Cheese<sup>37</sup></li> </ul>
	Codex Alimentarius Commission	<ul style="list-style-type: none"> <li>- DEFRA is the lead UK government department<sup>38</sup> for Codex, the large international body which provides food standards, guidelines and codes of practice in the international trade of food and agricultural products<sup>39</sup></li> </ul>
Animal Welfare	Animal Welfare Regulations	<ul style="list-style-type: none"> <li>- Protect animal welfare on farms, in transport, at markets and at slaughter</li> </ul>
	Draft Bill: Animal Welfare (Sentencing and Recognition of Sentience)	<ul style="list-style-type: none"> <li>- To increase the maximum penalty for animal cruelty offences from 6 months to 5 years imprisonment</li> <li>- To ensure that animals are defined in UK law as sentient beings<sup>40</sup></li> </ul>
Rural	Rural Proofing	<ul style="list-style-type: none"> <li>- Rural proofing means ensuring all policies take into account rural issues</li> <li>- Rural proofing responsibilities were brought under DEFRA's remit in 2011, and a Rural Communities Policy Unit (RCPU) was set up, plus the 'Ministerial team also act as rural champions within government, supported by the RCPU'<sup>41</sup></li> <li>- The RCPU was closed in 2015<sup>42</sup> and no longer exists as a specific unit — the work is now part DEFRA's Rural Policy Team<sup>43</sup></li> </ul>

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Multiple	Systems Research Programme	<ul style="list-style-type: none"> <li>- Programme involving six senior academic fellows across Rural, Land Use, Food, Air Quality, Marine, and Resources and Waste, led by DEFRA's Chief Scientific Advisor</li> <li>- Taking a 'systems mapping' approach to identify how a policy change in one area might affect another, and make sure the connections between environmental issues are properly considered<sup>44</sup></li> </ul>
	National Food Strategy	<ul style="list-style-type: none"> <li>- Year-long review, commissioned by the DEFRA Secretary of State in 2019, to 'build on the work underway in the Agriculture Bill, the Environment Bill, the Fisheries Bill, the Industrial Strategy and the Childhood Obesity Plan to create an overarching strategy for government'.</li> <li>- Broad remit covering 'not just the supply chain (the linear movement of food from farmer, through processor, to retailer and consumer), but the wider network of our interconnected food system, and the outcomes it produces for our environment, our health and well-being, our jobs and livelihoods, and our families'.</li> <li>- The review, headed by DEFRA Non-Executive Director Henry Dimbleby, will be followed up with publication by the government of 'an ambitious, multi-disciplinary National Food Strategy, the first of its kind for 75 years, in the form of a White Paper'<sup>45</sup></li> </ul>

Source: Author from cited references

## Size and structure

DEFRA is one of 25 ministerial departments (i.e., departments headed by ministers not civil servants).

The Department is overseen by the Secretary of State (SoS) for Environment, Food and Rural Affairs, who is accountable to Parliament. The SoS is supported by junior ministers from the House of Commons and the House of Lords<sup>46</sup>. The areas of policy responsibility assigned to ministers in the department appear to change as personnel change. For example, the ministerial posts listed in the department's 2018-19 annual report specify the following ministerial roles and remits:

- Parliamentary Under Secretary of State for the Environment
- Parliamentary Under Secretary of State for Rural Affairs and Biosecurity
- Minister of State for Agriculture, Fisheries and Food
- Parliamentary Under Secretary of State for Food & Animal Welfare<sup>47</sup>.

The latter position was a new one, created in September 2018, and involving responsibility for animal welfare, climate change adaptation, EU exit readiness oversight, food chain (with the lead for food and drink industry strategy) and forestry<sup>48</sup>, but with a focus on 'food supplies', which media coverage linked to Brexit food supply fears<sup>49</sup>.

However, by January 2020 this role was no longer listed on the DEFRA website (and the minister who was in the role had moved elsewhere in government). The list of ministerial roles was now:

- Minister of State (unspecified)
- Minister of State (unspecified)
- Parliamentary Under Secretary of State (unspecified)
- Parliamentary Under Secretary of State (Minister for Rural Affairs and Biosecurity)<sup>50</sup>.

Changes in ministerial posts and remits present a barrier to understanding where responsibilities for different aspects of food policy lie, and how much emphasis is being placed on, for example, food rather than agriculture, or rural issues.

DEFRA 'is supported by and works collaboratively with over 30 public bodies' (Table 3), collectively known as 'the DEFRA group' since 2016<sup>51</sup>.

Defra has around 3,500 staff<sup>52</sup>, and experienced a significant rise in staff as a response to Brexit. According to the National Audit Office, Defra recruited more than 1,300 new staff in 2017-18, and told Parliament it planned to recruit an additional 1,600 in 2018-19<sup>53</sup>. In 2019, the department was 'at its largest size since 2011 Quarter 2, after being cut by 28% between the 2010 Spending Review and 2016 Quarter 2'<sup>54</sup>.

**Table 3. Key food-related DEFRA public bodies**

Executive agencies	<ul style="list-style-type: none"> <li>- Animal and Plant Health Agency</li> <li>- Centre for Environment, Fisheries and Aquaculture Science</li> <li>- Rural Payments Agency</li> <li>- Veterinary Medicines Directorate</li> </ul>
Executive non-departmental public bodies	<ul style="list-style-type: none"> <li>- Agriculture and Horticulture Development Board</li> <li>- Consumer Council for Water</li> <li>- Environment Agency</li> <li>- Joint Nature Conservation Committee</li> <li>- Marine Management Organisation</li> <li>- Natural England</li> <li>- Sea Fish Industry Authority</li> </ul>

Source: Author

### *Division of responsibility*

As with other departments, it is challenging to identify how the areas of policy responsibility in the DEFRA group are organised. Up-to-date departmental organograms are not available and there are ongoing changes to how the department is organised. The most recent available annual report (2017-18) describes a division of responsibility between the following ‘outcome areas’:

- Food, farming and biosecurity
- Floods and water
- Environmental quality
- Marine and fisheries
- Natural environment and rural.

‘Delivery bodies that contribute to each outcome area work together, with core DEFRA, as an “outcome system” under the guidance of an “outcome system leader” to ensure effective delivery’. This is said to result in ‘closer co-ordination of policy and delivery and strengthened capability’<sup>55</sup>.

### *Board*

Each central government department has a board, chaired by the Secretary of State, with members including junior ministers; the permanent secretary and other civil service executives; and non-executive board members (NEBMs). NEBMs

‘provide advice and bring an external perspective to the business of government departments’ but do not have decision-making powers<sup>56</sup>. The lead NEBM for DEFRA at the time of writing is Henry Dimbleby, who is heading the development of a new National Food Strategy for England<sup>57</sup>.

Defra’s board is supported by three sub-committees: the Audit and Risk Assurance Committee, the Nominations Committee and the Executive Committee. The latter is the senior decision-making body for the DEFRA group, setting the department’s strategic direction and ensuring alignment of priorities, work and resources<sup>58</sup>.

### **Links with Devolved Administrations and Local Government**

Agriculture is a devolved responsibility, meaning that each of the UK nations is responsible for its own policy. However, this is complicated by the fact that the Westminster government is responsible for EU relations on behalf of the whole UK. At present this has implications for several areas of joint interest, including Geographical Indications, consumer confidence, exports and imports, all of which involve ‘conversations with the DAs [Devolved Administrations] at regular intervals’<sup>59</sup>. Another key link is via farm subsidy payments, where, for example, if one country misses its deadline for subsidy payments to farmers, then all four nations have to negotiate who will pay the fine to the EU<sup>60</sup>. Policy coordination is managed through various mechanisms, including the UK Co-ordinating Body, which has a representative from each government on the management board. And in terms of ‘policy day to day’ there are ‘working relationships’ with the UK government departments (called Territorial Offices) which represent the UK government’s interests in each of the three DAs, as well as with the DAs themselves and their directors for the environment and food and farming.

DEFRA is reported to have less involvement with local government than other departments such as FSA or DHSC/PHE<sup>61</sup>.

## Brexit

A 2017 report from NAO states, ‘the scale of Brexit preparations dominates large parts of DEFRA’s attention, affecting about 80% of its business’<sup>62</sup>. The department’s cross-government co-ordination on EU Exit includes working with:

- HMRC and Border Force on customs and border controls
- HO on migrant EU labour
- DIT on trade relations
- BEIS on chemical regulation, Euratom and the Emissions Trading System
- DHSC on veterinary medicines, food safety and public health protection
- HSE on chemical and pesticide regulation.

According to the NAO, ‘in complex areas of policy where responsibility sits across a number of government departments, cross-departmental boards have been created to facilitate co-ordination’. Examples include cross-government boards for borders, devolution and legislation. In the area of chemical regulation, DEFRA is leading cross-departmental co-ordination jointly with the HSE<sup>63</sup>. On the food side in particular, there are joint governance arrangements for all EU Exit projects between FSA and DEFRA and the department brings in DH and BEIS where needed<sup>64</sup>.



## Food Standards Agency

The Food Standards Agency (FSA) is a non-ministerial department, accountable to Parliament through the Secretary of State for Health and Social Care<sup>65</sup>. Scotland has its own agency, Food Standards Scotland<sup>66</sup>.

### Goals

The agency’s goal is that ‘people can trust that the food they buy and eat is safe and honest’ and it has a pledge:

*‘to put consumers first in everything we do, so that food is safe and what it says it is, that we have access to an affordable healthy diet, and can make informed choices about what we eat, now and in the future’<sup>67</sup>.*

It aims to do this by:

*‘using science, evidence and information both to tackle the challenges of today, and to identify and contribute to addressing emerging risks for the future; using legislative and non-legislative tools*

*highly effectively to protect consumer interests and deliver consumer benefits – influencing business behaviour in the interests of consumers; being genuinely open and engaging, finding ways to empower consumers both in our policy-making and delivery, and in their relationship with the food industry’<sup>68</sup>.*

### Policy responsibilities

All the FSA’s policy responsibilities are related to food. The main ones are:

- Food Safety
- Food Hygiene
- Feed Safety
- Animal Welfare Enforcement
- Labelling and Allergens
- Food Crime
- Antimicrobial resistance (AMR)
- Food Surveillance
- Scientific Advice.



The Food Standards Agency’s history provides important context for its current role, and indeed the way responsibilities for food governance are currently shared, both across Whitehall and across the UK. The FSA was created in 2000, with the main statutory objective to ‘protect public health from risks that may arise in connection with the consumption of food (including risks caused by the way in which it is produced or supplied), and otherwise to protect the interests of consumers in all matters connected with food’<sup>69</sup>. The agency took over a number of functions formerly carried out by the Department of Health and the Ministry for Agriculture, Fisheries and Food (now DEFRA) following a series of food safety scares which undermined trust in the agriculture ministry to protect public interests around food<sup>70</sup>. A report announcing the new agency noted how the division of responsibilities between different departments of government was confusing, meaning a better co-ordinated and more rational approach to food safety policy was essential:

*‘By giving central responsibility to a single body, whose essential aim is the protection of public health and which has the right to make its advice to ministers public, the government will ensure that the effectiveness of controls on food is*

*not undermined by overlaps, conflicting objectives or incoherence’<sup>71</sup>.*

Along with food safety, the agency initially also had responsibilities for nutrition. However, its remit was narrowed in 2010 – reportedly in part because it was considered to be overextending its reach<sup>72</sup>.

Today, the FSA’s former remit in England is shared with other departments: DEFRA has responsibility for ensuring food meets composition standards (for example on minimum meat content) and for food labelling other than on safety and nutrition, while DHSC is responsible for nutrition standards (including health claims and nutrition labelling). The agency also slimmed down over time (though it has been recruiting in response to Brexit, see below). The FSA’s budget was reportedly cut by ‘nearly 23% in the period from 2011-12 to 2016-17, and the number of samples taken for testing by EHOs in the UK fell by 22%, and in England by almost 25%.’<sup>73</sup>.

## Main food-related policy areas and activities

The FSA is unusual in that it sets out, on its website, the pieces of legislation which underpin its work, as outlined in Table 4.

**Table 4. Legislation underpinning the FSA’s work**

Legislation	Details
Food Standards Act 1999	Establishes the Food Standards Agency; sets out its goal to protect public health in relation to food; and gives it power ‘to act in the consumer’s interest at any stage in the food production and supply chain’ <sup>74</sup>
Food Safety Act (1990)	Provides the framework for all food legislation in England, Wales and Scotland. The main responsibilities for all food businesses under the Act are to ensure that: <ul style="list-style-type: none"> <li>- businesses do not include anything in food, remove anything from food or treat food in any way which means it would be damaging to the health of people eating it</li> <li>- the food businesses serve or sell is of the nature, substance or quality which consumers would expect</li> <li>- the food is labelled, advertised and presented in a way that is not false or misleading<sup>75</sup></li> </ul> The equivalent legislation in Northern Ireland is The Food Safety Order 1991 <sup>76</sup>
General Food Law Regulation (EC) No 178/2002/ Food Safety and Hygiene (England) Regulations 2013	<ul style="list-style-type: none"> <li>- Creates general principles and requirements of food law across Europe.</li> <li>- The Food Safety and Hygiene (England) Regulations 2013 provide for the enforcement, including penalties, of certain provisions of the General Food Law<sup>77</sup>.</li> <li>- Food businesses are required to comply with the legislation, which relates to the safety of food, traceability, notification of food safety incidents and withdrawal and recall of unsafe food, and are supported to do this by the FSA<sup>78</sup>.</li> </ul>

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European Food Information to Consumers Regulation No 1169-2011/Food Information Regulations 2014	<ul style="list-style-type: none"> <li>- Details the information which must be provided to consumers when they buy food and how that information must be presented<sup>79</sup></li> <li>- The Food Information Regulations 2014 enable Local Authorities to enforce the EU Food Information to Consumers Regulation<sup>80</sup></li> </ul>
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Source: Author from cited references

**Table 5. FSA: Main food-related policy activities**

Policy Activity	Details
Implementing the principles and requirements outlined in legislation (Table 4)	<p>The FSA is the ‘Central Competent Authority responsible for oversight and assurance that the regulatory system is effective’ and supports Local Authorities to meet their responsibilities, for example on food safety, labelling and advertising, under key food safety and standards legislation, including the Food Safety Act and General Food Law</p> <p>Food safety refers to the potential for harm, such as ‘risks from microbiological, chemical, physical, radiological or allergen contamination that could render the food unsafe for human consumption’<sup>81</sup></p> <p>Food standards refers to the potential for consumers to be misled, for example on the composition or nutritional quality of foods<sup>82</sup></p> <p>Local Authorities are responsible for enforcement of food safety and standards regulations (individual businesses themselves being responsible for safety), working with food business operators that may include food producers, food processors, catering establishments, takeaway and food delivery, retailers and approved dairy establishments.<sup>83</sup></p> <p>The FSA provides statutory guidance – the ‘Food Law Code of Practice’ – for LAs on how to implement the law, which, for example, ‘requires them to take a risk-based approach to delivering food controls, targeting their resources at the food businesses that represent the highest risk to consumers’. It also provides non-statutory Practice Guidance, with more general advice<sup>84</sup></p>
Food and Feed Safety Controls (including hygiene)	<ul style="list-style-type: none"> <li>- The FSA is directly responsible for food and feed safety controls at producers of meat, dairy products and wine</li> <li>- Responsible for ensuring that food controls are delivered by environmental health and trading standards officers within LAs and port health authorities<sup>85</sup></li> <li>- Responsible for food safety incidents</li> </ul>
Regulating Our Future	<ul style="list-style-type: none"> <li>- New model for food regulation involving digital registration of food businesses, and the use of single ‘primary authority’ oversight of multi-site food businesses (see below for more details)</li> </ul>
Labelling and Allergens	<ul style="list-style-type: none"> <li>- In Wales and Northern Ireland, the FSA is responsible for policy on food labelling and food compositional standards which are safety and non-safety related. In Northern Ireland, this includes nutrition policy and labelling. The Welsh Government is responsible for nutrition policy and labelling in Wales</li> <li>- In England the FSA is responsible for food safety related labelling including allergens. (DEFRA is responsible for policy on food labelling and food compositional standards which are non-safety related only; DHSC is responsible for nutrition policy and labelling)<sup>86</sup></li> </ul>
National Food Crime Unit	<ul style="list-style-type: none"> <li>- Established in 2015 as a result of recommendations made in the Elliot Review of the horse meat incident in 2013</li> <li>- Dedicated law enforcement capability focused on improving understanding of the food crime threat at a strategic level, identifying specific instances of dishonesty within food supply chains, and instigating action by others capable of addressing it<sup>87</sup></li> </ul>
Food Hygiene Rating Scheme	<ul style="list-style-type: none"> <li>- Provides information on the standards of hygiene in businesses from results of official food hygiene inspections</li> <li>- Unlike Wales and Northern Ireland, not mandatory to display in food businesses in England<sup>88</sup>. Scotland’s Food Hygiene Information Scheme is also not mandatory<sup>89</sup></li> </ul>

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Antimicrobial Resistance	<ul style="list-style-type: none"> <li>- Contributing to the delivery of strategy and progress reports with DHSC, PHE, DEFRA and the Veterinary Medicines Directorate</li> <li>- Role is to contribute to reducing the risk posed by AMR, improving the evidence base concerning AMR and the food chain, for example by monitoring the levels of AMR in food, and working to better understand the impact of interventions aimed at tackling AMR in food production<sup>90</sup></li> </ul>
The UK Food Surveillance System (UKFSS)	<ul style="list-style-type: none"> <li>- Management of national database for the central storage of analytical results from food and feed samples from LAs (and Port Authorities)</li> <li>- Surveillance and policy development, identifying local, regional and national trends in food and feed sampling, to help define and target future sampling programmes and to meet statutory obligations on reporting monitoring results for chemicals and residues in food and feed to European Food Safety Authority<sup>91</sup></li> </ul>
Food and You	<ul style="list-style-type: none"> <li>- Flagship consumer survey which provides key data on people’s behaviours, attitudes and knowledge on food safety and food-related issues<sup>92</sup></li> </ul>
Scientific Advice	Draws on technical expertise of several ‘FSA-owned’ Scientific Advisory Committees, and two independent committees: the Science Council (established 2017) and the Advisory Committee for Social Science (established 2018)
Codex Alimentarius Commission	DEFRA is the UK overall Department lead for Codex, the large international body which provides food standards, guidelines and codes of practice in the international trade of food and agricultural products, but the FSA leads in many vertical committees dealing with food hygiene, food additives and food contaminants <sup>93</sup>
Understanding Complexity in the food System	<ul style="list-style-type: none"> <li>- The FSA and the Economic and Social Research Council co-funded a series of five projects on challenges to the UK agri-food system, food safety, food fraud/ crime and consumer trust. Part of the multi-agency Global Food Security programme</li> <li>- Explored the effects on safety and confidence of different approaches to food provision, supply chain management and organisation, and how these insights might lead to policy interventions and influence consumer, regulator and industry behaviours<sup>94</sup></li> </ul>

Source: Author from cited references

One of the agency’s most significant recent activities has been its new model for food regulation. The Regulating our Future programme includes the following key elements, as outlined by the National Audit Office:

- Online business registration: The FSA aims for digitally enabled registration of food businesses, to provide LAs with a clearer view of information obtained from food businesses and to give the FSA oversight and a comprehensive understanding of the food industry.
- Risk segmentation of food businesses: Currently, LAs must inspect all food businesses within 28 days of registration to make an initial risk assessment. The FSA aims to develop a more data-driven risk segmentation approach, which will be used to categorise businesses and determine the

frequency of interventions.

- Primary Authority National Inspection Strategies: Under a national inspection strategy, one local authority – the primary authority – will work with a multi-site food business or group of businesses. The aim is to recognise compliant businesses and enable LAs to direct their resources at new businesses and those businesses that are performing poorly<sup>95</sup>.

### Size and structure

The total number of staff at the agency was around 1,500 (across Westminster and the devolved regions), as of the 2017-18 accounting period<sup>96</sup>. It is run by a Chief Executive, supported by a number of directors. The agency’s staff and budget experienced cuts over the past 10 years<sup>97</sup>, though it has been recruiting in response to Brexit, by

expanding its pool of Scientific Advisory Committee members, recruiting the support of approximately 40 additional independent expert advisers<sup>98</sup>, and an increase in risk management capacity by 30% and its science capacity by 30%<sup>99</sup>.

The FSA works with a number of advisory bodies:

- Advisory Committee on Animal Feeding stuffs (ACAF)
- Advisory Committee on Novel Foods and Processes (ACNFP)
- Advisory Committee on the Microbiological Safety of Food (ACMSF)
- Science Council (replaced the former General Advisory Committee on Science (GACS))
- Advisory Committee for Social Science (ACSS)
- General Advisory Committee on Science
- Advisory Committee for Social Science<sup>100</sup>.

The FSA also draws on other independent advisory structures, including its shared access to the Committee of Committee on Carcinogenicity of Chemicals in Food, Consumer Products and the Environment (COC) and the Committee on Mutagenicity (COM).

### *Division of Responsibility*

Directors include a Director of Science, a Director of Policy, and a Chief Scientific Advisor<sup>101</sup>. The FSA also has a Local Delivery Division, responsible for working with LAs.

### *Board*

Because it is a non-ministerial government department, the agency is governed by its board, rather than directly by ministers. The board consists of a chair and between eight and 12 other members – one appointed by the Welsh health minister and one by the Northern Ireland health minister – who are responsible for the overall strategic direction of the organisation, and mainly appointed by the Secretary of State for Health and Social Care. One unusual characteristic is that the FSA board holds its meetings in public and publishes agendas, papers and decisions<sup>102</sup>. There are also advisory committees from Wales and Northern Ireland,

which advise the board about food policy in those countries<sup>103</sup>.

## **Links with Devolved Administrations and Local Government**

The FSA's policy responsibilities require a significant amount of joint working with both the devolved and local levels of government. 'Official controls' – including inspection, verification and audit – are delivered by a range of enforcement authorities in the UK: 'in GB these include the FSA and Local Authorities, whereas in Northern Ireland controls are delivered by FSA, district councils and the Department of Agriculture, Environment and Rural Affairs (DAERA)<sup>104</sup>. Enforcement of UK feed and food law relating to feed and food safety, hygiene, composition, labelling, and imported food and feeding stuffs is largely the responsibility of LAs, principally delivered through environmental health and trading standards services<sup>105</sup>.

Feed and food safety and standards are devolved matters. The FSA has responsibility at central government level for the main body of feed and food safety law in England, Wales and Northern Ireland, with dedicated offices working to the relevant parliaments in England and Wales and the Northern Ireland Assembly. In Scotland a separate national body, Food Standards Scotland (FSS) exists, having been set up in 2015 and taking responsibility for central government functions previously carried out by the FSA in Scotland. In addition, as already mentioned, following changes introduced in 2010, FSA responsibilities for food law across England Wales and Northern Ireland are no longer harmonised. For example, whereas in England, the FSA is only responsible for labelling matters of food safety such as 'Use By' dates and allergens labelling, in Wales, the FSA retains responsibility for general food labelling, with the Welsh government responsible for nutrition-related food legislation, and in Northern Ireland the FSA retains responsibility for general food labelling and nutrition related to food legislation<sup>106</sup>. The Northern Ireland picture is further complicated by the existence of Safefood, a food safety campaigning

body, government-funded by not just Northern Ireland but the Republic of Ireland as well<sup>107</sup>. This division of responsibilities means frequent meetings are held between the various agencies. Several formal arrangements underpin the links between these organisation, including:

- A Memorandum of Understanding (a statement of intent as to the working relationship between the two bodies, not a legally binding document) between the FSA and FSS, ‘which encourages and supports collaboration between the two agencies and the sharing of information, science and evidence’. There are also more detailed cross-working arrangements set out in various Working Level Agreements<sup>108</sup>.
- A Concordat setting out an agreed framework for co-operation between the Executive of the Food Standards Agency in NI and Safefood, the Food Safety Promotion Board<sup>109</sup>.

The FSA says it works closely with LAs in the UK, with ‘agreements and protocols in place to support Local Authorities in their work and give guidance to explain the regulations and how they can be applied to food businesses’<sup>110</sup>. One method is through the FSA Smarter Communications platform, a communicators forum for regulators and professionals ‘to ask questions, discuss technicalities, and collaborate in a single, shared space’.<sup>111</sup> There is a specific directorate – the Local Delivery Division<sup>112</sup> – responsible for liaising with LAs on implementation, and involving regional coordination teams. The level of funding LAs allocate to food controls has been declining, falling by an estimated 19% between 2012-13 and 2017-18. Food hygiene staff (measured as the number of staff employed per 1000 food businesses), declined by 13% and food standards staff by 45% over the same period<sup>113</sup>. According to former FSA chair Tim Smith, the numbers of ‘boots on the ground’ in LAs has deteriorated since the early 2000s to the point that they are not making sufficient day-to-day inspections of the premises under their control<sup>114</sup>.

## Brexit

Because around ‘95% of food and feed law in the UK is actually EU law that needs to be repatriated’<sup>115</sup> the impacts of Brexit on the policy responsibilities of the FSA will be significant – including the creation of ‘an equivalent regulatory regime, one that can be evidenced to the public, to industry and in the face of international scrutiny’<sup>116</sup>. This is because:

*‘Under the current system of largely harmonised EU food and feed law, a considerable amount of risk analysis is undertaken by the European institutions, including the European Food Safety Authority (EFSA) (risk assessment) and the European Commission (EC) (risk management), with involvement of the Member States throughout the process, e.g. through EC Standing Committees’<sup>117</sup>.*

These increased responsibilities, and ‘increased workload for the food safety bodies within the UK, and greater scrutiny of the evidence and governance procedures used in decision making’<sup>118</sup> have raised questions about capacity<sup>119</sup>.

There is also uncertainty about the future remit of the agency, including its arm’s-length status and ultimately ‘who will take responsibility for food safety management decisions after Brexit day’<sup>120</sup>. As a consumer representative said in evidence to a Select Committee, Brexit ‘raises some real capacity issues’ about scientific risk assessment, but also about ‘decision-making for risk management, particularly as some of the issues that consumers would see as related just to food may split between different responsibilities across different government departments’<sup>121</sup>.

Discussions on how to share responsibility between the FSA and other key departments working on food have highlighted a possibility that the agency’s responsibilities could be expanded or contracted<sup>122</sup>.



# Department of Health and Social Care

## Goals

None of the goals of the Department of Health and Social Care (DHSC) specifically mentions food, though it is implicit in its primary goal to ‘keep people healthy’<sup>123</sup>.

## Policy responsibilities

DHSC has many responsibilities to which diet is relevant, such as cancer treatment, children’s health, dementia, end of life care and mental health, but the only one explicitly focusing on food concerns ‘obesity and healthy eating’<sup>124</sup>.

## Main food-related policy areas and activities

The DHSC’s main policy areas related to food, which all come under the broader responsibility for

‘obesity and healthy eating’, are:

- Public Health
- Diet and Nutrition (including obesity)
- Labelling
- AMR
- Public Food Procurement.

Food and nutrition-related issues are located in the DHSC’s Population Health Department, which covers the childhood obesity strategy plus ‘all functions around food and nutrition’<sup>125</sup>. The goals of the Population Health Department include promoting a healthy balanced diet and preventing health harms that could emerge from poor quality of food, on which it works jointly with the FSA and DEFRA. There is also a nutrition legislation team, much of whose work is linked to activities at EU level<sup>126</sup>.

**Table 6. DHSC: Main food-related policy activities**

Policy Activity	Details
Childhood Obesity Plan (COP) – Chapter I	The government’s flagship policy to reduce childhood obesity. Proposals in the COP included: Soft Drinks Industry Levy; reformulation programme to take out 20% of sugar in specified products; supporting innovation to help businesses make their products healthier; updating the nutrient profiling model (a tool used by the Office of Communications, a DCMS body, to underpin advertising restrictions by assessing foods according to their nutrient content); making healthy options available in the public sector; a healthy rating scheme for primary schools; a campaign to encourage all schools to commit to School Food Standards; possible changes to food labelling to improve clarity (post-Brexit) <sup>127</sup>
Childhood Obesity Plan – Chapter II	New proposals in Part 2 of the COP included: Calorie Reduction Programme challenge to food industry; ban on specified price promotions; trailblazer programme with LAs on food environments; update of School Food Standards to reduce sugar consumption; consultation on strengthening the nutrition standards in the Government Buying Standards for Food and Catering Services <sup>128</sup>
(COP) Soft Drinks Industry Levy (with HMT)	The Soft Drinks Industry Levy (SDIL) is designed to tackle the largest contributor of sugar in children’s diets by instructing soft drink manufacturers to reduce the sugar in their drinks or pay the Levy – with the drinks highest in sugar being taxed at a higher rate <sup>129</sup>
(COP) Reformulation	Industry was challenged to take 20% of sugar out of the foods most commonly eaten by children, by 2020, with a 5% reduction target for the first year <sup>130</sup>

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(COP) Price Promotions	An intention has been announced, and a consultation conducted, on a policy to ‘ban price promotions, such as buy one get one free and multi-buy offers or unlimited refills of unhealthy foods and drinks in the retail and out-of-home sector through legislation’, including promotion of unhealthy food and drink by location (at checkouts, the end of aisles and store entrances) <sup>131</sup>
(COP) Labelling	A consultation has been run (and results are being analysed) on the introduction of ‘legislation to mandate consistent calorie labelling for the out-of-home sector (e.g. restaurants, cafes and takeaways) in England, with a consultation before the end of 2018’ <sup>132</sup> . DHSC has also announced an intention to explore ‘what additional opportunities leaving the European Union presents for food labelling in England that displays world-leading, simple nutritional information as well as information on origin and welfare standards’ <sup>133</sup>
(COP) Energy Drinks	A consultation was conducted in late 2018 (and results are being analysed) on an intention to introduce legislation to end the sale of energy drinks to children by all retailers <sup>134</sup>
(COP) Advertising	A consultation has been run (and results are being analysed) on introducing a 9pm watershed on TV advertising of High Fat, Sugar and Salt (HFSS) products, and similar protection for children viewing adverts online, with the aim of limiting children’s exposure to HFSS advertising and driving further reformulation <sup>135</sup> . DHSC is also reviewing governance arrangements for online advertising – which is overseen by the Committee of Advertising Practice, working alongside the Advertising Standards Authority (ASA), on a self-regulatory basis – and considering whether this continues to be the right approach for protecting children from the advertising of unhealthy food and drinks, or whether legislation is necessary <sup>136</sup>
(COP) Calorie Reduction Programme	Challenges all food and drink companies to reduce the calories by 20% in a range of everyday foods consumed by children, by 2024 <sup>137</sup>
Healthy Food Programme	Includes schemes like Nursery Milk, Healthy Start Vouchers and Vitamins and School Fruit and Vegetables <sup>138</sup> . COP II included a commitment to consult on plans to use Healthy Start Vouchers to provide additional support to children from lower income families, who are at greater risk of obesity <sup>139</sup>
UK Antimicrobial Resistance Strategy	The Government launched its first five-year UK strategy to tackle antimicrobial resistance in September 2013. The strategy takes a ‘one health’ approach, addressing AMR in humans, animals and the environment. A number of government departments and agencies are involved in steering and delivering the strategy, which is led by PHE, DHSC and DEFRA <sup>140</sup> . A second five-year strategy was launched in 2019 <sup>141</sup>
Government Buying Standards	DHSC is responsible for the nutritional part of Government Buying Standards (interviewee 029). The department is currently running a consultation on strengthening the nutrition standards in the Government Buying Standards for Food and Catering Services, to bring them into line with the latest scientific dietary advice <sup>142</sup> . In COP I it committed to encouraging LAs to adopt the GBSF, particularly in leisure centre vending machines, and ensuring there is full uptake of the GBSF in central government departments <sup>143</sup>

Source: Author from cited references

## Size and structure

DHSC is a ministerial department, headed by a Secretary of State, and is supported by 15 arm’s-length bodies and a number of other agencies and public bodies. It employs 2,160 staff<sup>144</sup>. The arm’s-length body most relevant to food policy is Public Health England (discussed below). DHSC has reportedly ‘scaled down quite significantly and re-structured itself so that it is less duplicating in

areas where it can commission PHE to do things’, making it ‘leaner and tighter’<sup>145</sup>.

### *Division of responsibility*

The division of responsibility for health policy is complex, and many of the bodies involved are not directly relevant to food policy. The most significant responsibilities as relevant to food are shared between the DHSC – which is responsible for health overall – and bodies such as PHE (discussed

below), NHS England and the National Institute for Health and Care Excellence (NICE).

The body NHS England is responsible for NHS commissioning (the process of planning, agreeing and monitoring health services, undertaken by NHS England and local ‘clinical commissioning groups’). NHS England is relevant to food policy due to its role in addressing unhealthy food on NHS premises, and implementing food standards<sup>146</sup>, making it a lever for addressing hospital food. It is also responsible for primary care services such as general practitioners and dentists<sup>147</sup>, which have a front line role in food-related public health.

NICE is an advisory body responsible for providing ‘robust evidence-based guidance and advice’ to healthcare providers and commissioners<sup>148</sup>. Its advice has covered obesity, maternal and child nutrition, and food allergies<sup>149</sup>.

### **Board**

The DHSC board includes ministers and senior civil servants from the department, and a number of non-executive directors. It is supported by an audit and risk committee, an executive committee, a management committee and a number of advisory groups. The main food-related advisory group, the Obesity Review Group, is now defunct. It included academics, civil society groups covering health and consumer issues, and food industry trade associations<sup>150</sup>.

## **Links with Devolved Administrations and Local Government**

With health a devolved responsibility, the nations have their own health policies, including on food-related health, ‘although the devolved administrations currently retain substantially the same legislative framework’<sup>151</sup>. For example Scotland introduced its own ‘diet and healthy weight delivery plan’ in 2018<sup>152</sup> and Wales conducted an obesity policy consultation in 2019<sup>153</sup>. There are certain high-level mechanisms to connect health-related policy activity across the UK, but nothing specifically on food-related health could be identified. There is very little publicly available

information about how the four countries work together or communicate on their different policy approaches.

Local Authorities have, since 1 April 2013, been responsible for improving the health of their local population and for public health services, though the Secretary of State continues to have overall responsibility for improving health – with national public health functions delegated to Public Health England (discussed below)<sup>154</sup>. PHE is responsible for providing ‘evidence, advice and support to Local Authorities about fulfilling their new public health responsibilities’<sup>155</sup>. DHSC works with LAs through the Local Government Association and through MHCLG (which is responsible for local authority funding). There is a suggestion, raised in a Select Committee report in 2018, that national-local connections on obesity policy have not been working particularly well, with many LAs reporting to national government that ‘their influence can only go so far’ and ‘national government must give them the levers they need to be able to tackle the obesogenic environment and to provide an effective range of support services’ to reduce health inequality at local level<sup>156</sup>.

## **Brexit**

The main Brexit implications are around labelling and the potential freedom to make labelling and nutrition claims policy more effective<sup>157</sup>.





# Public Health England

Public Health England (PHE) is an executive agency of the Department of Health and Social Care, and a distinct delivery organisation with operational autonomy<sup>158</sup>. As laid out in a Framework Agreement with DHSC, this autonomy means PHE is ‘free to speak to the evidence and its professional judgement’<sup>159</sup>.

## Goals

The goals of PHE are to protect and improve the nation’s health and wellbeing, and reduce health inequalities.

## Policy responsibilities

PHE provides government, local government, the NHS, parliament, industry and the public with evidence-based professional, scientific and delivery expertise and support<sup>160</sup>. PHE works closely with DHSC, as the agency provides the department’s ‘advice on nutrition, basically’<sup>161</sup> along with the Scientific Advisory Committee on Nutrition, which is a UK-wide Advisory Committee<sup>162</sup>. PHE is responsible for the following, many of which are underpinned by food and diet, though these are not specifically mentioned:

- Making the public healthier and reducing

differences between the health of different groups by promoting healthier lifestyles, advising government and supporting action by local government, the NHS and the public

- Protecting the nation from public health hazards
- Preparing for and responding to public health emergencies
- Improving the health of the whole population by sharing information and expertise, and identifying and preparing for future public health challenges
- Supporting LAs and the NHS to plan and provide health and social care services such as immunisation and screening programmes, and to develop the public health system and its specialist workforce
- Researching, collecting and analysing data to improve our understanding of public health challenges, and come up with answers to public health problems<sup>163</sup>.

## Main food-related policy areas and activities

PHE’s main policy area related to food is:

- Public Health Nutrition (including obesity).

**Table 7. PHE: Main food-related policy activities**

Policy Activity	Details
Assisting national government on delivery of Childhood Obesity Plan	Including by providing support to: <ul style="list-style-type: none"> <li>- HMT on soft drinks levy (which was a recommendation in PHE’s evidence review of 2015)</li> <li>- DCMS on advertising and promotions<sup>164</sup></li> <li>- DfE on food schools including the school food standards<sup>165</sup></li> </ul>
Sugar Reduction Programme (Part of COP)	<ul style="list-style-type: none"> <li>- To support industry to reach targets, PHE published guidance on the total sugar levels per 100g, and on the calorie content of products likely to be consumed on a single occasion, for the food categories included in the programme<sup>166</sup>.</li> <li>- Results from the programme so far have been mixed<sup>167</sup></li> </ul>

Nutrient Profiling Model	- PHE established an expert group and ran a consultation exercise to review the nutrient profiling model <sup>168</sup>
Producing major evidence reviews to guide health policy	- For example the 2015 ‘world-leading evidence review of how best to reduce the nation’s excessive sugar consumption’, which provided the foundations for the COP, and the levy on sugary drinks - More recently, a review of food and drinks aimed at infants and young children found ‘clear inconsistencies between national infant feeding advice and how some commercial baby food and drink products are presented’ <sup>169</sup>
Public health campaigns	- Such as the recent Change4Life campaign to help families cut back on sugar <sup>170</sup> - Provides campaign resources on this and other themes, such as taking a ‘whole-school approach to food’ <sup>171</sup> .
Eatwell Plate	- Produces the UK’s food based dietary guidelines, the Eatwell plate – ‘a visual representation of how different foods contribute towards a healthier balanced diet’ <sup>172</sup>

Source: Author from cited references

## Size and structure

PHE is a non-ministerial agency, and as such is headed by a chief executive<sup>173</sup>. It employs 5,500 staff (full-time equivalent), mostly scientists, researchers and public health professionals, across London and eight regional centres<sup>174</sup>.

### *Division of responsibility*

Within PHE, the Diet, Obesity and Physical Activity Division is responsible for work to improve diet and nutrition and combat obesity. According to the only public source that could be identified (a job advert) it consists of around 50 people and nine teams, covering: Nutrition Science (SACN); Dietary Surveys and Food Composition; Obesity and Healthy Weight; Dietary Improvement; Nutrition Advice; Physical Activity; UK Nutrition Health Claims Committee; International work; and Business Management<sup>175</sup>. The Dietary Improvement team (which includes a nutrition advice team)<sup>176</sup> leads ‘all the work with industry and with NGOs around the reduction and formulation agenda on sugar, on salt, on calories and on infant weaning foods’<sup>177</sup>.

### *Board*

The PHE Board is responsible for providing strategic advice on the running of PHE, assuring the effectiveness of PHE’s corporate governance arrangements, and advising the chief executive, and meets four times a year<sup>178</sup>. Members of the

public can attend the meetings by request<sup>179</sup>.

## Links with Devolved Administrations and Local Government

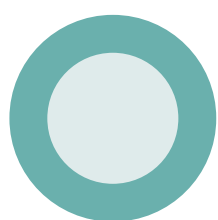
The government’s web page on PHE describes how it works ‘closely with public health professionals in Wales, Scotland and Northern Ireland, and internationally’<sup>180</sup>. This means the devolved authorities are kept ‘very close to all the development work, the evidence case, and usually throughout a lot of the processes there is a monthly call’<sup>181</sup>. The devolved representatives are also invited to set-piece meetings, such as the sugar reduction meetings, or on calories or salt. At the same time it is clear that Scotland, in particular, is developing its own policy and approach<sup>182</sup>.

When government reforms created PHE in 2013<sup>183</sup>, responsibility for commissioning many public health services moved from the NHS to LAs, with PHE responsible for supporting those LAs on public health<sup>184</sup>, mainly through provision of information and evidence<sup>185</sup>. PHE also funds LAs’ public health functions through a grant (made under Section 31 of the Local Government Act 2003), and LAs are accountable to the chief executive of PHE for their compliance with the conditions attached to it<sup>186</sup>. PHE works with LAs through its network of regional centres, and the regional directors are ‘briefed regularly’<sup>187</sup>. An example of how PHE is supporting LAs is the Whole Systems Approach (WSA) to Obesity project, where – in partnership

with the Local Government Association (LGA) and the Association of Directors of Public Health – it commissioned Leeds Beckett University to deliver a three-year ‘action research’ programme, launched in October 2015, to test theory and local practice about systems approaches and translate the learning into practical guidance to help councils set up a WSA in their local areas<sup>188</sup>.

## Brexit

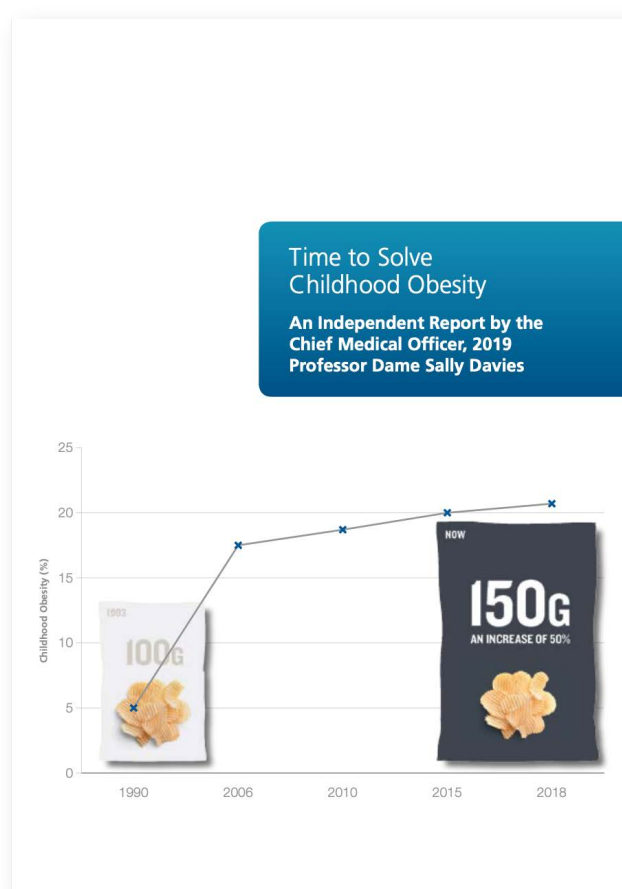
PHE’s main role regarding Brexit is to ‘support DHSC and the government on negotiations with the EU; and to ensure day one readiness for the continuity of health protection and security, and where appropriate, health improvement’<sup>189</sup>. One of its specific duties will be to establish ‘a nutritional claims committee funded by DHSC to manage relevant processes following EU Exit’<sup>190</sup>.



## Chief Medical Officer

Health policy, including in relation to food, is also influenced by a Chief Medical Officer (CMO), who is an independent advisor to government, providing recommendations, for example on extending the soft drinks levy to sweetened milk-based drinks, reviewing fiscal dis/incentives for un/healthy food, setting more ambitious reformulation targets, and strengthening the Healthy Start programme. The CMO’s 2018 set of recommendations makes specific proposals for new approaches to food governance, including supporting LAs ‘with legal powers and tool kits that allow them to improve the health environment for their populations, particularly in areas surrounding schools’, and suggesting that MHCLG ‘explore, with the LGA, how it can better support local government action to encourage healthier food options on the high street’<sup>191</sup>. A 2019 report by the outgoing CMO, Dame Sally Davies, went further, highlighting the role of legislation in changing societal norms, and arguing that government must ‘rebalance the food and drinks sold to favour healthy options through regulation’, such as a cap on calories per serving for all food and drink sold by the out-of-home sector, and ‘allow children to grow up free from marketing, signals and incentives to consume unhealthy food and drinks’, through interventions

such as using data analytics to turn off adverts of unhealthy food and drink <sup>192</sup>.



Time to Solve Childhood Obesity, Department of Health and Social Care 2019.



# Department for International Development

The Department for International Development (DFID) ‘leads the UK’s work to end extreme poverty, helps to deliver the Sustainable Development Goals (SDGs) overseas, and tackles global challenges in line with the government’s UK Aid Strategy’<sup>193</sup>. Although DFID is not directly responsible for food policy-making in England, it is relevant here because much of the support it provides to developing countries is in the areas of food aid and agriculture; and because food is also pivotal to its work on meeting the SDGs. There is scope for cross-government working, and DFID’s overseas focus also aims to bring secondary benefits for UK businesses and researchers<sup>194</sup>. The department’s annual report confirms that ‘eradicating poverty, ending instability and creating a safer and more prosperous world are firmly in the UK’s national interest’<sup>195</sup>.

## Goals

The department’s goals do not mention food, but food is often an element of the policies it develops in pursuit of its aims to strengthen global peace,

security, governance and resilience, and tackle global poverty<sup>196</sup>.

## Policy responsibilities

DFID’s remit spans many areas where food is relevant (for example as a driver of economic development and wealth creation, an agent of gender discrimination / redress, or a factor in climate change mitigation), but none of its policy responsibilities explicitly focuses on food.

## Main food-related policy areas and activities

DFID’s main food-related policy areas are:

- Research Funding
- Agricultural Development
- Agri-tech
- Humanitarian crises
- Climate change and environmental degradation
- Sustainable Development Goals.

**Table 8. DFID: Main food-related policy activities**

Policy Activity	Details
Development Research Funding	<p>DFID funds work in three areas:</p> <ul style="list-style-type: none"> <li>- to develop new technologies and products such as drought resistant crops</li> <li>- to help understand what development approaches work most effectively</li> <li>- to improve our understanding of key development questions, such as predicting the onset of the West African rains<sup>197</sup>.</li> </ul> <p>The department started scaling up nutrition work in 2010<sup>198</sup>, is a partner in the Global Food Security Programme<sup>199</sup> (the UK cross-government funding programme for food research), and funds nutrition and agriculture development programmes including in partnership with organisations like Unicef or Gates Foundation, such as Strategic Partnership on Agriculture and Food Systems for Nutrition<sup>200</sup>. Funding also goes to international research centres such as the CGIAR, and the International Centre of Insect Physiology and Ecology<sup>201</sup></p>
Agricultural Development	<p>DFID’s agriculture programmes support smallholder farmers in developing countries through improved inputs, access to markets and climate resilience. It supports the Global Agriculture Food Security Programme (a multilateral financing programme), and has a programme on land governance, LEGEND, to protect people’s property rights and facilitate investment<sup>202</sup></p>

## Food Research Collaboration - Rethinking Food Governance

### Who makes food policy in England?

Agri-tech Catalyst	The Agri-tech Catalyst is a funding programme set up by Innovate UK, DFID and BBSRC with £70m to help 'make the UK a world leader in agricultural technology, innovation and sustainability' <sup>203</sup> . Its scope covers: primary crop and livestock production including aquaculture; non-food uses of crops including ornamentals; food security and nutrition challenges in international development; and addressing challenges in downstream food processing, provided the solution lies in primary production <sup>204</sup>
Humanitarian Crises	Responding to crises, including famine <sup>205</sup>
Climate Change and Environmental Degradation	DFID is responsible for providing 'support to enable low carbon growth and to build greater country resilience, including by supporting sustainable use of natural resources and limiting future growth in harmful greenhouse gases'. This includes looking at food as a factor in environmental degradation and climate change <sup>206</sup> .
SDGs	DFID has policy oversight <sup>207</sup> and organises some interdepartmental co-ordination around the SDGs <sup>208</sup> . In 2017 the department published a policy statement, 'focused on the overarching SDG principle that no one should be left behind in the process to transform our future', which has been criticised for focusing too heavily on the department's international work and ignoring issues in the UK, for example around hunger <sup>209</sup>
Food Systems	DFID also has an emerging focus on 'food systems' as a lens through which to understand its role and work <sup>210</sup>

Source: Author from cited references

## Size and structure

The department is headed by a Secretary of State and employs around 2,700 staff<sup>211</sup>.

### *Division of responsibility*

DFID has several teams working on food-related matters, including a nutritional policy team<sup>212</sup>, an agricultural policy team and an agricultural research team<sup>213</sup>.

### *Board*

DFID's board is chaired by the Secretary of State for International Development and meets quarterly<sup>214</sup>.

## Links with Devolved Administrations and Local Government

Not applicable due to the nature of the department's overseas remit.

## Brexit

The UK currently channels a significant percentage of its aid budget through EU mechanisms, so one of the major impacts will be the possibility to decide how it spends the entirety of its foreign aid<sup>215</sup>. Also connected to funding, a major concern

for the department is the potential impact of Brexit (especially exit without a deal) on EU-funded programmes: a note on the DFID website explains that the EU intends to terminate funding to some programmes in the event of a no deal exit, but that 'DFID intends to ensure that vulnerable populations are not penalised'. It says that the UK will continue to fund the post-exit outputs of official development assistance programmes that were previously paid for by the EU<sup>216</sup>. Aside from funding, DFID's policy responsibilities relate to Brexit in terms of its aims to continue to provide 'duty-free access to the UK market for the least developed countries', and 'to offer generous tariff reductions to around 25 other developing countries', as well as to replicate the favourable trade terms of the EU's Economic Partnership Agreements<sup>217</sup>. The only staff changes related to Brexit identified in the research were staff from DFID being moved to other departments: around 60, with a possible 170 others, including 25 to DEFRA<sup>218</sup>.



# Department for Business, Energy and Industrial Strategy

The Department for Business, Energy and Industrial Strategy (BEIS) was created by a merger of the former Department for Business, Innovation and Skills (BIS) and the Department of Energy and Climate Change (DECC) in July 2016<sup>219</sup>, to create a ‘super-ministry’, with multiple policy domains within its remit. While none is explicitly food-focused, all can impact food policy-making, and several underpin it in important ways. For example, business and industrial strategies apply to food (which is the UK’s largest manufacturing sector<sup>220</sup>).

Domains cover:

- Business
- Industrial strategy
- Science, research and innovation
- Energy and clean growth
- Climate change<sup>221</sup>.

## Goals

The department lists its key aims (for 2019-2020) as to:

- Deliver an ambitious Industrial Strategy
- Maximise investment opportunities and bolster UK interests as we leave the EU

- Promote competitive markets and responsible business practices
- Ensure the UK has a reliable, low cost and clean energy system
- Build a flexible, innovative, collaborative and business-facing department.

## Policy responsibilities

As noted, food-related policy is a relatively small part of the wide-ranging BEIS remit, but the department nevertheless has responsibility for some important elements of food policy.

## Main food-related policy areas and activities

BEIS’s main policy areas related to food are:

- Climate Change
- Agricultural Technology
- Science, Research & Innovation
- Industry Strategy
- National Minimum Wage
- Groceries Code Adjudicator
- Competition
- Chemicals.

**Table 9. BEIS: Main food-related policy activities**

Policy area	Policy Activity	Details
Science, Research and Innovation	Agri-tech Strategy	Along with DEFRA, BEIS was the lead department on the Agri-tech Strategy, launched in 2013 with £160m to support the UK ‘to become a world leader in agricultural technology, innovation and sustainability; exploit opportunities to develop and adopt new and existing technologies, products and services to increase productivity; and contribute to global food security and international development’ <sup>222</sup>
	Agri-Food Technology Leadership Council	Previously the Agri-tech Leadership Council – amended to increase its coverage of the food supply chain <sup>223</sup> . Its aim is to ‘provide insight and leadership to improve the food and agriculture sectors’. Chaired by DEFRA and BEIS, and with members including Sainsbury’s, Syngenta, AHDB, Which?, the DEFRA Chief Scientific Advisor and Innovate UK <sup>224</sup> . No details could be identified on regularity or content of meetings

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Who makes food policy in England?

Science, Research and Innovation	Government Office for Science	A body which is situated within BEIS, is funded by BEIS, shares BEIS's offices and works closely with officials in BEIS. But 'GO-Science' is not an executive agency of BEIS: its head – the Government's Chief Scientific Advisor – reports to the Cabinet Secretary and the Prime Minister. GO-Science can 'be thought of as a Cabinet Office unit that is embedded within BEIS' because of its synergies with the work of the Minister for Universities, Science, Research and Innovation <sup>225</sup> . Most departments (including Defra) have their own chief scientific advisors, but they work 'together under the professional leadership of the Government Chief Scientific Advisor, mainly via the Chief Scientific Advisor network which meets weekly' <sup>226</sup> . Responsible for government 'Foresight' projects such as the 2011 Future of Food and Farming report <sup>227</sup>
	Research Funding	BEIS has responsibility for the majority of government investment in science, principally funding research (including food research) through its partner organisations, the research councils and Innovate UK. Other government departments fund research specific to their policy areas <sup>228</sup>
Industrial Strategy	Industrial Strategy White Paper (2017)	A 'long-term plan to boost the productivity and earning power of people throughout the UK' which makes small reference to food with an aim to 'put the UK at the forefront of the global move to high-efficiency agriculture' in response to 'rising global demand for food and water'. Introduces a 'Transforming food production: from farm to fork' programme to 'put the UK at the forefront of advanced sustainable agriculture' and 'increase the incentives for investment in sustainable agriculture, helping to grow the markets for innovative technologies and techniques ... over the coming years, as we replace the Common Agricultural Policy' <sup>229</sup> .
	Industrial Strategy Challenge Fund: Transforming Food Production	Aimed at helping support the agriculture sector by: <ul style="list-style-type: none"> <li>- bringing together businesses, farmers and academics to take forward priority research projects through new Challenge Platforms</li> <li>- supporting Innovation Accelerators which will be responsible for exploring the commercial potential of new tech ideas at pace</li> <li>- demonstrating innovative agri-tech projects and how they will work in practice</li> <li>- launching a new bilateral research programme that will identify and accelerate shared international priorities and help build export opportunities for pioneering agricultural-technologies and innovations overseas<sup>230</sup></li> </ul>
	Food and Drink Sector Council	Part of Industrial Strategy (2017), this partnership between government and the whole food chain is 'working with industry leaders from agriculture, food and drink manufacturing, retail, hospitality and logistics' to 'to secure the UK's position as a global leader in sustainable, affordable, safe and high-quality food and drink' <sup>231</sup>
	Sector Deal for Food and Drink Manufacturing	The Food and Drink Sector Council was tasked with building on emerging proposals for a sector deal in food and drink manufacturing, including support to transform exports and capitalise on innovation opportunities in sustainable agriculture and food manufacturing <sup>232</sup> . Sector deals are partnerships between the government and industry on sector-specific issues, aimed at boosting 'productivity, employment, innovation and skills' <sup>233</sup> . The trade association the Food & Drink Federation's (FDF) website states that its sector deal proposal has been submitted to BEIS and a period of negotiation will take place to define scope and co-investment <sup>234</sup> . The FDF's proposals for the deal include a Food and Drink Export Portal website; a Market Research Unit; and Market Access Assistance 'to put in place food and drink sector specialists in markets that offer the greatest opportunity for growth but are difficult markets for businesses to access'; and a network of demonstrator sites, based on existing Centres of Excellence for Food and Drink Manufacturing <sup>235</sup> . However, 'formal negotiations were paused to allow for EU Exit preparations, and a decision is soon to be taken on how to progress' <sup>236</sup>
	Local Enterprise Partnerships (with MHCLG)	<ul style="list-style-type: none"> <li>- Private sector-led partnerships between businesses and local public sector bodies</li> <li>- Originally created under the Department for Business Industry and Skills Local Growth White Paper 2010</li> <li>- Replaced the former Regional Development Agencies</li> <li>- The Industrial Strategy confirmed that the government remained firmly committed to Local Enterprise Partnerships<sup>237</sup></li> </ul>

Climate Change	Committee on Climate Change	<ul style="list-style-type: none"> <li>- Independent statutory body established under the Climate Change Act 2008</li> <li>- Comprises a Chairman and eight independent members</li> <li>- Jointly sponsored by BEIS, the Northern Ireland Executive, the Scottish government and the Welsh government</li> <li>- Published Net Zero: The UK's Contribution to Stopping Global Warming (May 2019) which noted that progress has been too slow on agriculture and land use, and includes demand-reduction measures on red meat and dairy</li> </ul>
	Clean Growth Strategy	<ul style="list-style-type: none"> <li>- Sets out action to cut emissions, increase efficiency across multiple sectors, including business and industry, homes, transport, power, natural resources (including agriculture), and the public sector<sup>238</sup></li> </ul>

Source: Author from cited references

BEIS is also the department responsible for the following, which are relevant to food policy:

- The Groceries Code Adjudicator (GCA), the independent regulator 'ensuring that regulated retailers treat their direct suppliers lawfully and fairly'<sup>239</sup>
- The Better Regulation Executive, which 'works with government departments to monitor the measurement of regulatory burdens and coordinate their reduction, and to ensure that the regulation which remains is smarter, better targeted and less costly to business'<sup>240</sup>
- The National Minimum Wage (which is enforced by the agency HMRC)<sup>241</sup>
- The Competition and Markets Authority, an independent non-ministerial department which investigates mergers and markets, and acts to protect consumers from unfair trading practices<sup>242</sup>
- UK Research & Innovation (UKRI), the national funding agency for science and research in the UK, which brings together the seven Research Councils, Innovate UK and Research England<sup>243</sup>.

## Size and structure

BEIS is led by a Secretary of State, supported by four ministers, and employs around 3,000 staff<sup>244</sup>.

### *Division of responsibility*

The policy areas are split as follows, with potential impacts on food in any of the areas:

- Minister of State for Energy and Clean Growth

- Minister of State for Universities, Science, Research & Innovation
- Minister for Small Business, Consumers and Corporate Responsibility
- Minister for Business and Industry

The policy teams are divided into: Business and Science (including Industrial Strategy, Cities and Local Growth, Science and Research, and Agri-tech); Energy and Security; Energy Transformation and Clean Growth (which includes international climate strategy and finance); Enterprise (Including Business Growth); EU Exit and Analysis; and Market Frameworks (which includes the Better Regulation Executive)<sup>245</sup>.

### *Board*

BEIS has a departmental board and an executive committee<sup>246</sup>.

## Links with Devolved Administrations and Local Government

BEIS is described by the NAO as consulting with the devolved administrations of Wales, Scotland and Northern Ireland 'on a range of workstreams, including on energy issues'<sup>247</sup>. No examples of food-related policy links between BEIS and local government were identified.

## Brexit

Food-related issues are not mentioned specifically in BEIS's Brexit preparations<sup>248</sup>.





## Department for Education

### Goals

Food is not mentioned in the goals of the Department for Education (DfE). However, DfE is responsible for children’s welfare, which entails some specific food-related responsibilities and activities<sup>249</sup>.

### Policy responsibilities

The department is responsible for ‘for children’s

services and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England’<sup>250</sup>.

### Main food-related policy areas and activities

The DfE’s main policy areas related to food are:

- School Food (including childhood obesity)

**Table 10. DfE: Main food-related policy activities**

Policy Activity	Details
Healthy Schools Rating Scheme	A commitment under the COP, the healthy schools rating scheme is a self-assessment tool designed to help schools improve the health and wellbeing of their pupils <sup>251</sup> . Under this voluntary scheme, primary and secondary schools complete a self-assessment exercise and then receive a rating based on their responses around food education, compliance with the School Food Standards, time spent on physical education and the promotion of active travel. Each participating school receives a report based on their survey answers, and those achieving Gold, Silver or Bronze awards receive a certificate <sup>252</sup>
School Food Plan	A plan, published in 2013, setting out ‘17 actions to transform what children eat in schools and how they learn about food’ including: putting cooking into the curriculum; food-based standards for all schools; increasing take-up of school meals; financially self-sufficient breakfast clubs; flagship boroughs; extending free school meal entitlement; training head teachers and Ofsted inspectors concerning behaviour and culture in the dining hall and the way a school promotes healthy lifestyles <sup>253</sup>
Free School Meals	Following a recommendation in the School Food Plan, in September 2014, a Universal Infant Free School Meals policy was introduced, stipulating that all children in England’s state-funded schools in reception, year 1 and year 2 should be provided with a free school lunch <sup>254</sup>
School Food Standards	As part of the School Food Plan, a new set of standards for all food served in schools was launched by DfE, set out in the School Food Regulations 2014 <sup>255</sup> . They became mandatory in all maintained schools, and new academies and free schools from January 2015 <sup>256</sup> . The standards are currently being updated in light of subsequent SACN recommendations on carbohydrates, including sugar and fibre <sup>257</sup>
Healthy Food Programme	Includes schemes like Nursery Milk, School Fruit and Vegetables, and Healthy Start Vouchers and Vitamins <sup>258</sup>
National Curriculum	The National Curriculum is a set of subjects and standards used by primary and secondary schools, which schools are required to follow ‘so children learn the same things’ <sup>259</sup> . The ‘Cooking and Nutrition’ part of the curriculum specifies that ‘as part of their work with food, pupils should be taught how to cook and apply the principles of nutrition and healthy eating’. The curriculum specifies in more detail what children should be taught on cooking and nutrition at the various ‘key stages’ of education <sup>260</sup>

Source: Author from cited references

## Size and structure

The Department for Education has 4,580 full-time equivalent employees, not including its agencies<sup>261</sup>.

### *Division of responsibility*

The childhood obesity and school food teams are based in the Special Educational Needs and Disadvantage division of the department<sup>262</sup>. The department formerly had an Office for School Food which is now closed<sup>263</sup>.

### *Board*

No details could be identified.

## Links with Devolved Administrations and Local Government

Education is a devolved matter, so there are separate policies on school food in Scotland<sup>264</sup>, Wales<sup>265</sup> and Northern Ireland<sup>266</sup>. There is some

informal information-sharing on monitoring standards, but no formal mechanism to connect work on this policy area<sup>267</sup>.

The department says it works closely with LAs<sup>268</sup>, but adoption of School Food Standards, for example, is not mandatory – just ‘strongly encouraged’ – and there is no large-scale auditing of local implementation, just responses to any reported breaches<sup>269</sup>.

## Brexit

The main implications of Brexit for the department’s work on food are around the school milk and fruit and vegetables schemes, which are EU policy. Stakeholders – including the National Farmers’ Union<sup>270</sup>, and the School and Nursery Milk Alliance<sup>271</sup> – have been pressing DfE to continue the policy with a domestic replacement post-Brexit.



## Other Departments

The seven departments covered so far are the main departments identified as having a role in making food policy. There are several other departments which have a lesser role (Table 11).

Of these, the Treasury – the government’s economic and finance ministry<sup>272</sup> – is the most significant because of its overall control of spending and more specifically, because of its role in nutrition policy through the Soft Drinks Industry Levy (SDIL), and agriculture policy, in terms of the budgets for the current Common Agricultural Policy and its post-Brexit replacement. The department’s role in the SDIL was, for example, described as a ‘game changer’, because ‘having the Treasury involved in a fiscal measure that is designed to make a positive contribution to public health, or to reverse a negative, is huge’<sup>273</sup>. The Department

for International Trade is working on Brexit-related food trade, and will have a more prominent role in food policy after Brexit, when the UK will assume greater responsibility for negotiating trade deals<sup>274</sup>. The Department for Transport has a role to play in supporting food distribution infrastructure, and also in supporting access to public transport by food workers and consumers. The Ministry for Housing, Communities and Local Government has a role in planning and in the regeneration of high streets, as well as in liaising with Local Authorities, for example on resilience and emergencies. The Department for Digital, Culture, Media and Sport has a role in the Childhood Obesity Plan through its regulation of advertising, and also in supporting the digital economy (important to food businesses and consumers, especially those in rural areas).

Other departments active on food are the Home Office<sup>275</sup> (on labour and skills) and the Department of Work and Pensions (on the Health and Safety Executive<sup>276</sup>). The Ministry of Justice was mentioned (by interviewees) in relation to prison catering

contracts<sup>277</sup>, and the Cabinet Office in terms of its projects on resource and national security, and the links to food security<sup>278</sup>. The Cabinet Office also plays an important role in overall policy coordination.

**Table 11. Other departments with a role in food policy-making**

Department	Role in Food Policy
Her Majesty's Treasury	<ul style="list-style-type: none"> <li>- Subsidies, including CAP</li> <li>- Taxes, including Soft Drinks Industry Levy; VAT</li> <li>- Trade Tariffs (e.g. Excise Duty)</li> <li>- Departmental Spending</li> </ul>
Department for International Trade	<ul style="list-style-type: none"> <li>- Post-Brexit Trade</li> <li>- Trade for Development</li> <li>- Industrial Strategy</li> <li>- Agri-tech</li> <li>- Food and Drink Sector Council</li> </ul>
Home Office	<ul style="list-style-type: none"> <li>- Labour and Skills (including migrant labour)</li> </ul>
Department for Work and Pensions	<ul style="list-style-type: none"> <li>- Health and Safety (Health and Safety Executive)</li> <li>- Social Security Payments</li> </ul>
Cabinet Office	<ul style="list-style-type: none"> <li>- Policy Oversight and Coordination (e.g. of Childhood Obesity Plan)</li> <li>- National Security and Resilience (e.g. National Security Capability Review and food security)</li> </ul>
Ministry of Justice	<ul style="list-style-type: none"> <li>- Enforcement</li> <li>- Prison Catering</li> </ul>
Ministry of Housing, Communities and Local Government	<ul style="list-style-type: none"> <li>- National Planning</li> <li>- Local Industrial Strategy</li> <li>- Urban Regeneration/High Streets</li> </ul>
Department for Culture, Media and Sport	<ul style="list-style-type: none"> <li>- Childhood Obesity Plan</li> <li>- OFCOM (UK independent communications regulator)</li> <li>- Rural Connectivity</li> </ul>
Department for Transport	<ul style="list-style-type: none"> <li>- Commercial distribution</li> <li>- Passenger Transport</li> <li>- Biofuels</li> </ul>

Source: Author



## Conclusions

This report presents the first detailed map of the government's involvement in food policy-making in England. It is based on information gathered by trawling through a wide range of public documents and interviewing experienced stakeholders, who have either been involved with policy-making directly or have observed it at first hand. The research has identified the key departments, listed which of their responsibilities are relevant to food, and described their main policy activities.

A map like this is an essential first step in understanding how food policy is 'done' by governments. It is also critical to developing the more systemic approaches to policy-making demanded by the food system's complex and interlinked challenges. The departmental structures and policy agendas mapped here show how food problems are being framed and tackled.

The map also shows how responsibilities for different aspects of food policy can arise or end up in different bits of government. Without this information it is hard for people inside or outside government to view the full range of policies, or take stock of achievements, gaps and duplications. It is hoped that in addition to providing useful information to policy makers, researchers and civil society actors, the mapping exercise will provide a template for others to follow.

But mapping policy activity is just the beginning. Next comes the process of assessing policy coherence: identifying how policies interact, where they support each other to produce multiple benefits, and where a lack of consistency undermines policy effectiveness. These topics will be covered in forthcoming reports in the Rethinking Food Governance series.

## Acknowledgments

Thanks are due to the interviewees who very generously gave their time and ideas for the FRC Rethinking Food Governance project. These included senior officials in key departments in Westminster, plus representatives from the food industry, civil society organisations working on food, and academia.

The project was supported by a group of advisors, from civil society and academia, who provided valuable guidance and reviewed findings: Dr Philip Baker, Deakin University; Assistant Professor Jessica Duncan, Wageningen University; Sue Davies, Chief Policy Advisor, Which?; Dr Modi Mwatsama, Senior Science Lead (Food Systems, Nutrition and Health), Wellcome Trust; and Duncan Williamson, independent food systems, biodiversity and sustainable diets expert, and director and trustee at Eating Better.

Professor Corinna Hawkes, Director of the Centre for Food Policy at City, University of London, has also supported this project and reviewed findings.

Finally, thank you to the anonymous civil servants who reviewed a draft of the report and provided helpful feedback.

The Rethinking Food Governance reports are designed and produced by Gavin Wren.

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- 278 Interviewee 021

# Rethinking Food Governance

The Rethinking Food Governance series aims to show how the government makes food policy, so that researchers and civil society organisations can understand the process better and spot opportunities to lever improvements. It applies to England but could be replicated for other areas.

Membership of the Food Research Collaboration is open to academics and civil society representatives working on food matters; futher information:  
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The Food Research Collaboration is an initiative of the [Centre for Food Policy](#), facilitating joint working between academics and civil society organisations to improve the UK food system



**FOOD RESEARCH  
COLLABORATION**

an initiative of the

**Centre for  
Food Policy**

Educating, researching & influencing  
for integrated and inclusive food policy

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ISBN: 978-1-903957-56-1

Kelly Parsons 2020.  
Who makes food policy in England? A map of government  
actors and activities.  
Rethinking Food Governance Report 1  
London: Food Research Collaboration

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