Rethinking Food Governance 2

How connected is national food policy in England?

Mapping cross-government work on food system issues

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February 2021

Series Editor
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FOOD RESEARCH
COLLABORATION

an initiative of

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Contents

Tables

Figures

Abbreviations

AMR	Antimicrobial Resistance
ATS	Agri-Tech Strategy
BEIS	Department for Business, Energy and Industrial Strategy
BIS	Department for Business, Innovation and Skills
CAP	Common Agricultural Policy
CCC	Committee on Climate Change
CEFAS	Centre for Environment, Fisheries and Aquaculture Science
CMO	Chief Medical Officer
CO	Cabinet Office
COP	Childhood Obesity Plan
CSA	Chief Scientific Advisor
CSO	Civil Society Organisation
DA	Devolved Administration
DCMS	Department for Digital, Culture, Media and Sport
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
DWP	Department of Work and Pensions

EA	Environment Agency
EAC	Environmental Audit Committee
EFRA	Environment Food and Rural Affairs (Select Committee)
EU	European Union
FCDO	Foreign, Commonwealth and Development 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
GCSA	Government Chief Scientific Advisor
GO-Science	Government Office for Science
HFSS	High Fat Sugar and Salt
HMT	HM Treasury
HMRC	Her Majesty's Revenue and Customs
HO	Home Office
HOC	House of Commons
HSE	Health and Safety Executive
IMG-EFRA	Inter-Ministerial Group for Environment, Food and Rural Affairs
IT	Information Technology
LA	Local Authority
MHCLG	Ministry of Housing, Communities and Local Government
NAO	National Audit Office
NAP	National Adaptation Programme
NCD	Non-Communicable Disease
NGO	Non-Governmental Organisation
OECD	Organisation for Economic Cooperation and Development
PHE	Public Health England
RSPB	Royal Society for the Protection of Birds
SDGs	Sustainable Development Goals
SoS	Secretary of State
UK	United Kingdom
UKFSA	UK Food Security Assessment
UKRI	UK Research and Innovation
UKSSD	UK Stakeholders for Sustainable Development

Key Points

- Policy connections are important because many urgent food system issues – such as obesity or food-related climate impacts – are multi-faceted and do not easily fit the institutional structures of government, which tend to be organised by responsibility for individual policy sectors, such as health, agriculture or trade.

- Major food-related challenges are seen to be systemic in that their causes and outcomes are complex and connected, spanning several policy areas. To tackle complex, systemic problems effectively, policy-making needs to be connected across departments, so the resulting polices work together and achieve benefits across the system.

- Connected policy-making (also referred to as 'coordinated' or 'joined-up' policy-making) helps to produce policies that tackle complex and systemic problems in a holistic way, while disconnected policy-making - where different part of government work separately on different aspects of the same issue - cannot tackle multi-faceted problems effectively. Disconnected policy-making risks producing policies that:

  - Address some aspects of a problem but not others;
  - Have unforeseen impacts on other parts of the system;
  - Waste effort and resources by duplicating each other;
  - Make it hard to identify who has overall responsibility for an issue;
  - Allow some problems to fall through the cracks between policies;
  - Contradict or undermine each other.

- Disconnected policy-making can therefore create policy incoherence. The term 'policy coherence' is used to describe how well policies work synergistically to tackle complex problems. It means that policies arising in one part of government, implemented by certain officials, take account of the goals, processes and lessons of other policies and implementation processes[1]. To create coherent policy, objectives and activities need to be connected during the process of policy-making.

- This report presents the results of a 'screening', or 'bottom-up' survey of how national food policy is working, and where it could be organised more effectively.

- The screening identified nine important food policy issues being tackled in a connected way (or where the approach aspired to be connected).

  - Agricultural Technology
  - Animal and Plant Health
  - Antimicrobial Resistance
  - Brexit
  - Childhood Obesity
  - Climate Change
  - Food Labelling
  - Public Food Procurement
  - Rural Issues

- The screening identified 14 examples of 'disconnects', where food issues were not being connected across government.

  - Agriculture and Public Health
  - Agri-tech and Rural Connectivity
  - Children's Food Interventions
  - Climate Change
  - Dietary Guidelines
  - Food Supply Chain Policy
  - Food Labelling and Composition
  - Hunger
  - Innovation and Nutrition
  - Interests of different client groups

- International Development
- Land Use
- Nutrition, Obesity and Income
- Trade

- The lists in this report should be viewed as a starting point for exploring how future food governance might be better connected: the examples of connected working are a foundation on which to build, and help provide some nuance to the long-standing blanket criticism that there is a failure to join up food policy in England.

- The screening method, and the lists of connections and disconnects it resulted in, offers a guide for other countries – and potentially cities – to screen their own policies for how well they connect food systems issues, actors and activities. Building such an evidence base encompassing food policy in multiple jurisdictions will help to clarify where connections are most needed, for the benefit of all.

- Along with these policy disconnects, there were disconnected perspectives on where connections were needed, with those working inside government (as civil servants or other officials) tending to think that food policy was already fairly well connected, and those working on food policy from outside government (in business, civil society, or academia) thinking it was not. Fixing connections is therefore not a neutral exercise, and while some disconnects are logistical, some arise from ideological or political differences, which require open acknowledgement and continuous negotiation.

- Recommendations include the need for improved communication and transparency of what is happening in government, a more connected approach by civil society and a 'de-siloing' of their access to policymaking, increased participation from outside stakeholders, and one or more governance mechanisms to bring actors and activities together to make connections where they are required.

Introduction

This report presents the first detailed analysis of how connected food policy is in England. By this we mean how effectively different parts of the national government are working together on issues that cut across departmental boundaries. It builds on the previous publication in the Food Research Collaboration's (FRC) Rethinking Food Governance series, *Who makes food policy in England?* That report showed how, in England, responsibility for policy-making that affects the food system involves 16 key government departments and public bodies, and described their food-related activities (summarised in Figure 1)[2]. This report moves on to look at where these departments are working together to take connected action to tackle food system issues, with the aim of producing coherent policies that deliver multiple benefits; and where they are doing so less effectively than they could be, leading to contradictions or omissions.

The report presents nine examples of good practice, where policy is working (or aspiring to work) in a connected way, and 14 disconnections, where issues are addressed in a fragmented or overlapping way.

Why policy connections are important

Policy connections are important because many urgent food system issues – such as obesity or climate change – are multi-faceted and do not easily fit the institutional structures of government, which tend to be organised by responsibility for individual policy sectors, such as health, agriculture or trade. 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'[3]. The food system involves economic, environmental, health, social and political dimensions, with impacts that ripple out to affect all these domains. Major food-related challenges are seen to be

systemic in that their causes and outcomes are complex and connected, spanning several policy areas.

To tackle these complex, systemic problems effectively, policy-making needs to be connected across departments, so the resulting polices work together and achieve benefits across the system. Connected policy-making (also referred to as 'coordinated' or 'joined-up' policy-making) helps to produce policies that tackle complex and systemic problems in a holistic way.

Disconnected policy-making, on the other hand, where different parts of government work separately on different aspects of the same issue, cannot tackle multi-faceted problems effectively. It risks producing policies that:

- Address some aspects of a problem but not others;
- Have unforeseen impacts on other parts of the system;
- Waste effort and resources by duplicating each other;
- Make it hard to identify who has overall responsibility for an issue;
- Allow some problems to fall through the cracks between policies;
- Contradict or undermine each other.

Disconnected policy-making leads, in other words, to policy *incoherence*.

The term 'policy coherence' is used to describe how well policies work synergistically to tackle complex problems. It means that policies arising in one part of government, implemented by certain officials, take account of the goals, processes and lessons of other policies and implementation processes[4]. To create coherent policy, objectives and activities need to be connected during the process of policy-making.

Figure 1.

National government responsibilities for food policy-making in England

Source: Parsons, K., Sharpe, R. and Hawkes, C. (2020) Who is making food policy in England. London: Centre for Food Policy, City, University of London.

International Trade
- Post-Brexit trade, potentially affecting food standards, production and prices

Foreign, Commonwealth & Development Office
- Food-related research and agricultural support for developing countries
- Support for export of UK agri-tech innovation
- Assistance in humanitarian crises, including famine
- Building overseas food system resilience
- Support for Sustainable Development Goals

Environment, Food & Rural Affairs
- Development of agriculture, fisheries and environment policies
- Food and agriculture-related climate change policy
- Natural resources relevant to food system
- Farm animal welfare
- Food and food packaging waste
- Aspects of food labelling
- Oversight of Public Procurement of food and catering services
- Support for school milk and fruit-and-veg schemes
- Leads on National Food Strategy, food in Security and Resilience planning, UK input to Codex Alimentarius

Food Standards Agency
- Oversight of food and feed safety regulation
- Support for Local Authority enforcement of food regulations
- Direct responsibility for safety of meat, dairy, wine
- Guidance for stakeholders on food safety and hygiene
- Scientific advice to government on food
- Aspects of food labelling
- Oversight of National Food Crime Unit
- Food surveillance (alerts on contamination, etc)

Justice
- Administration of the rule of law (including food safety, animal welfare and employment law) through courts and penalty system
- Prison catering

HM Treasury
- Overall control of government and departmental spending
- Imposition of taxes, including on foods and food businesses
- Imposition of trade tariffs (export and import taxes)

Housing, Communities & Local Government
- Planning policy, including development and housing provision (affecting food access)
- Urban regeneration / revitalisation of high streets (affecting food access)
- Liaison with Local Authorities on resilience and emergencies, including food supply

Cabinet Office
- Overall strategy and policy oversight
- Policy coordination (e.g. Childhood Obesity Plan)
- Coordination of Sector Security and Resilience Plans (include food as part of Critical National Infrastructure)

Education
- Standards for school food
- Free School Meals
- Healthy Schools ratings scheme
- Support for school milk and fruit-and-veg schemes
- Food in National Curriculum

Business, Energy & Industrial Strategy
- Climate change, including agriculture and food-related aspects
- UK strategy to develop agricultural technology
- Support for food system science, research & innovation
- Industrial Strategy, including ambitions on food
- National Minimum Wage, relevant to food workers
- Groceries Code Adjudicator (regulates major retailers' direct supply chains)
- Competition policy, including in the food industry

Public Health England
- Nutritional aspects of public health
- Support for Childhood Obesity Plan
- Advice to government and stakeholders on diet-related health
- Production of UK's Eatwell dietary guidelines
- (PHE soon to be replaced by the National Institute for Health Protection)

Health & Social Care
- Diet-related public health
- Obesity, including Childhood Obesity Plan
- Food assistance (Healthy Start Vouchers, free vitamins)
- Some aspects of food labelling
- Anti-microbial resistance (AMR) (linked to intensive livestock production)
- Nutritional standards for Public Food Procurement

Transport
- Strategic policy for / investment in transport infrastructure (road, rail, aviation, maritime), relevant to food transportation, worker transport and food access
- Driver licensing, including for food haulage drivers

Home Office
- Labour, including migrant labour relevant to food production, hospitality, etc
- Licensing of food chain labour via Gangmasters and Labour Abuse Authority
- Exposure of 'modern slavery' in food supply chains

Work & Pensions
- Regulation and administration of social security payments relevant to tackling food insecurity and diet-related ill-health
- Regulation of health and safety at work, including for food workers

Digital, Culture, Media & Sport
- Advertising, including restrictions on promotion of certain foods
- Role in Childhood Obesity Plan through regulation of advertising
- Digital infrastructure (important to food businesses and consumers, especially in rural areas)

ENG

Types of disconnection: Redundancy, Gaps, and Incoherence

Investigating how issues are being linked in government can reveal different types of policy (dis)connections, referred to here as 'Redundancy'; 'Gaps'; and 'Incoherence'[5].

Policy disconnects may be characterised by **redundancy** - inefficiency due to overlaps in policy responsibilities and activities, leading to duplication when different parts of government are working on the same problem from different angles (though there may also be legitimate reasons for overlap). An example in England might be the way the pre- and post-farm gate food supply chain is overseen by multiple departments.

Policy disconnects can be characterised as governance **gaps** – where policies could be better aligned to support government goals. For example, obesity policies that rely on dietary advice may be undermined if they ignore the influence of food advertising. Another type of gap is when issues 'fall through the cracks' because policy responsibilities for particular issues are unclear (hunger is an example of a governance gap which has been raised in England), or different departments are acting on different aspects of an issue - such as land use - in a disconnected way*.

Policy disconnects can result in **incoherence** if there are inconsistencies between the goals or plans of parallel departments acting on similar problems, or one policy is inadvertently undermining another, meaning tackling one food system problem creates others elsewhere. Agriculture policy that subsidises the kind of farming that causes high greenhouse gas emissions will contradict climate policy that is trying to reduce the same emissions. Incoherent policies can thus cancel each other out, perpetuating the problem they are trying to tackle. They will also miss opportunities to achieve multiple policy goals. For example, connecting agriculture and climate policy could potentially achieve coherence across several policy agendas, and benefit the environment, climate, health and the economy.

* Parsons, K.(2019) Brief 3. *Integrated Food Policy. What is it and how can it help transform food systems?* In: Rethinking Food Policy: A Fresh Approach to Policy and Practice. London: Centre for Food Policy.

Policy disconnections may be down to (remediable) departmental demarcations, historic working practices or failures in communication. However, the research for this report also discovered several deeper disconnections -- situations where there are underlying (potentially ideological) tensions between food policy goals, or where important food system impacts are absent (or excluded) from the food policy agenda. In proposing policy change, it is important to be clear whether policy incoherence arises from practical or ideological causes. Approaches to policy change will differ depending on whether it is practices or ideas that need to be influenced.

Mapping policy connections

Mapping where policies are connected or disconnected is an important step towards achieving coherent policy. To date, there have been few attempts to understand how connected an entire government's approach to food is. The limited body of existing analysis tends either to discuss food policy connections in a generic way, with little granularity in terms of where the links exist or are required; or to analyse policy coherence by comparing the objectives of one sector with those of another, for example trade policy with health policy[6]. The mapping in this report is different. Rather than selecting two policy areas and examining the coherence between them,

it takes as a starting point food policy activities across government as a whole, and screens it for policy connections and disconnections. It draws on existing 'policy coherence analysis' methods[7] and a recommendation by the Organisation for Economic Cooperation and Development (OECD)[8] to screen policies for potential 'interactions' (or connections), which should then be scrutinised to ascertain how important they are from a policy perspective and whether they warrant adjustment.

For this report, the mapping process used expert interviews and documentary analysis to probe:

- Where food policy connections are already being made;
- Where connections which could be beneficial are weak or missing;
- Where underlying tensions mitigate against policy coherence.

Mapping policy *connections* through documentary analysis and interviews is relatively straightforward. Link-ups are often identifiable from documents and websites, or will be familiar to interviewees who have heard about or been involved with them. Mapping *disconnections* is harder. What is not happening is rarely discussed in websites or documents – though Select Committee reports (which draw together evidence from a range of witnesses in the food system) can provide a helpful source. Judgements about what is missing are therefore more subjective, and may be grounded in perceptions of how the food system 'should' be working, or which issues or objectives should be prioritised. The disconnections discussed in this report were primarily identified by asking interviewees inside and outside government where they saw potential for better connecting food-related issues. The examples raised are, therefore, not exhaustive and should be regarded as a starting point for further analysis and debate. Identifying potential disconnects and tensions through qualitative screening in this way has been recommended as a starting point to help governments initiate cross-government, or cross-stakeholder, dialogue and begin to address the consistency and effectiveness of their policies[9].

Methods, timeframe and sources

The report uses the same methods as were used in the FRC report *Who makes food policy in England?*, specifically extensive documentary research supplemented by in-depth interviews.

The data was collected in 2019, so the report provides a snapshot of the governance arrangements in place at that time. Governance is dynamic, so it is likely that some of the connections discussed here will have mutated or lapsed, and new ones may have been forged. The fact that Covid-19 happened after the data for this research was collected means that its hugely disruptive impacts on the food system are not captured here. Its lasting effects on food governance structures will take time to become visible, but clearly, like Brexit, Covid-19 is an example of how, in times of crisis, closer departmental working may be required, as outlined in the Food Research Collaboration's May 2020 report on food policy coordination and Covid-19[10]. Covid-19 has also magnified existing disconnects, many of which are identified in this report, for example those around hunger, and dietary guidelines[11].

While the issue of (dis)connected working on Covid-19 and food is not included in the report, one important, recent change to food governance since the data was collected has been added. In September 2020, the Department for International Development (DFID) was merged into the newly created Foreign, Commonwealth and Development Office (FCDO), and DFID's responsibilities for food policy transferred to the new department[12]. References to what was DFID at the time of the research have therefore been updated to FCDO. But while it was announced in August 2020 that Public Health England (PHE) would be replaced in 2021 by a new body, the National Institute for Health Protection[13], at the time of publication (January 2021) it was unclear where diet-related health responsibilities would reside after this change. References to PHE therefore remain unchanged.

Documentary sources used for the research included departmental websites; annual reports;

strategic plans; press releases; Parliamentary Select Committee reports and evidence submissions; National Audit Office (NAO) reports; consultation responses; and reports from external organisations. The research also drew on media coverage. Semi-structured interviews were conducted with 23 senior stakeholders from the civil service, civil society organisations, the industrial sector, consultancy and academia. Throughout this report, government departments, departmental bodies and other agencies are referred to mainly by their initials, explained in the list of abbreviations on page 4.
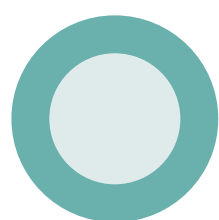
Part 1: Policy Connections

The nine connected issues

The research for this report identified nine important food policy issues which were being tackled in a connected way (or where the approach aspired to be connected). The issues (in alphabetical order) are:

- Agricultural Technology
- Animal and Plant Health
- Antimicrobial Resistance
- Brexit
- Childhood Obesity
- Climate Change
- Food Labelling
- Public Food Procurement
- Rural Issues.

The issues, departments involved and (where possible) examples of specific policies are summarised in Table 1, represented graphically in Figures 2 and 3, and discussed in more detail, with commentary from the interviewees, in the following sections. The list is not presented as exhaustive, but rather highlights the main examples of connected food policy-making identified by the mapping process.

Figure 2 shows clearly how some departments (notably DEFRA, DHSC and PHE) are interconnected on several policy issues; whereas some departments - found in Report 1 to be involved in making decisions on food policy - are not connected on the issues discussed here. Figure 3 shows the issues, and the departments working on them, in the form of a chart.

Table 1: Selected examples of connected food policy-making in England

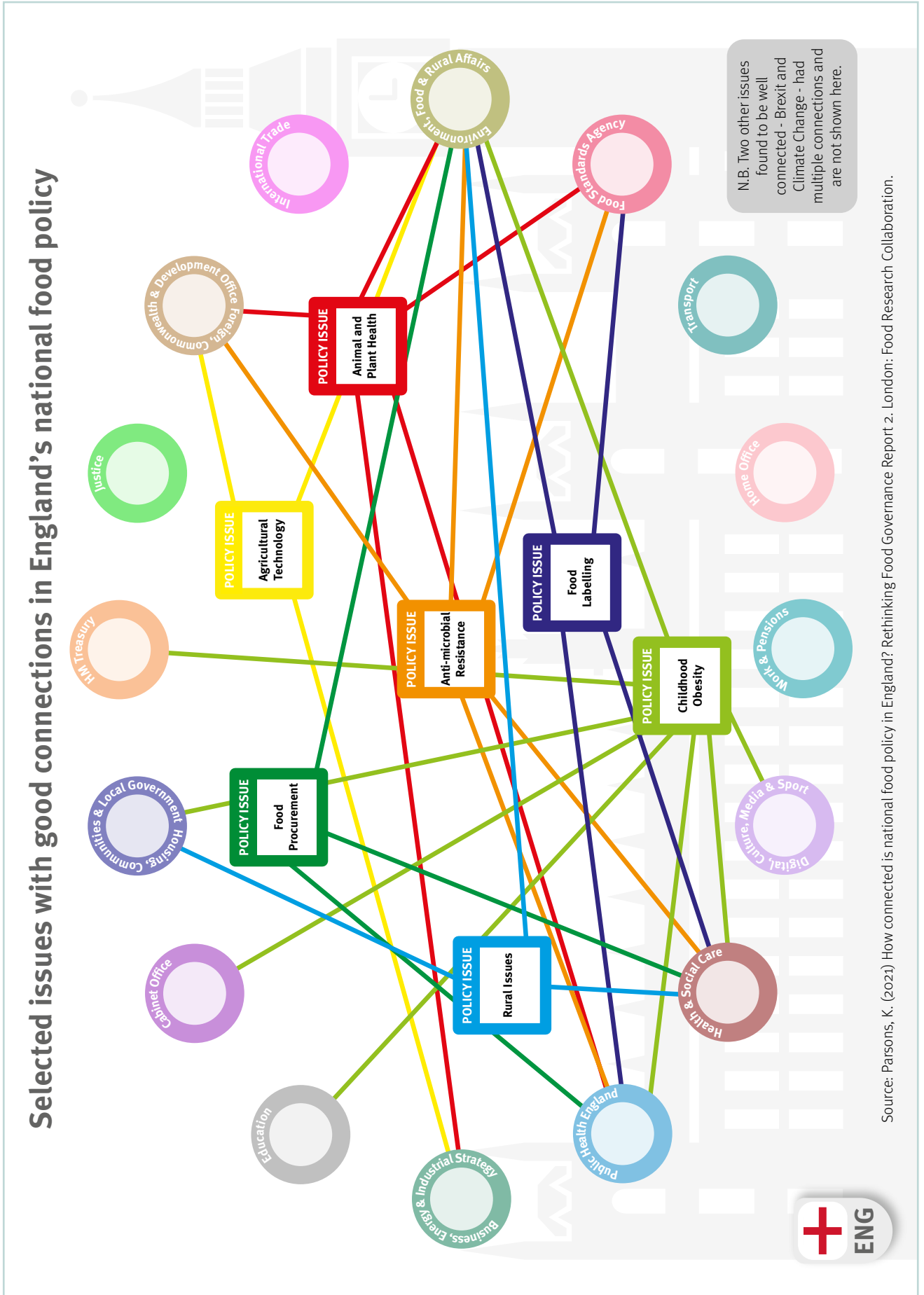| Policy issue	Examples of specific policies	Objectives	Key departments involved
Agricultural Technology	Agri-tech Strategy	To promote agricultural technology, innovation and sustainability	BEIS DEFRA FCDO
Animal and Plant Health	UK Partnership for Animal and Plant Health	To bring together government, public research funders and wider research stakeholders on animal and plant health	BEIS DEFRA FCDO FSA PHE

Antimicrobial Resistance (AMR)	AMR National Action Plan UK One Health Report Global AMR Innovation Fund	To address adverse impacts of the rise in pathogens resistant to antibiotics, linked to use of antibiotics in animal husbandry	DEFRA DHSC FCDO FSA PHE
Brexit	Various	Various measures to replace EU food law with UK law, or embed EU food regulation into UK law; also trade measures to address UK's changing status as importer and exporter of food and feed	Multiple
Childhood[14] Obesity	Childhood Obesity Plan (COP)	To reduce childhood obesity in England. Various elements (see separate items in this table)	CO DCMS DEFRA DfE DHSC HMT MHCLG PHE
	Soft Drinks Industry Levy (COP)	To reduce children's sugar intake from sweetened beverages	DEFRA DHSC HMT
	National Planning Policy Framework (COP)	To create healthy food environments through planning policy	DHSC MHCLG
	Nutrient Profiling Model (COP)	To restrict children's exposure to promotion of unhealthy foods	DCMS DEFRA DHSC PHE
	Natural Environment and Health (no specific policy) (COP)	To explore links between access to the natural environment and higher levels of physical activity	DEFRA DHSC
Climate Change	National Adaptation Programme	To reduce the UK's contribution to global greenhouse gas emissions, including from food production, distribution and consumption	Multiple
Food Labelling	Enforcement of EU Labelling Requirements Allergen Labelling Review	To signal different attributes of food products to consumers	DEFRA DHSC FSA PHE (plus Local Authorities)
Public Food Procurement	Government Buying Standards for Food and Catering Services	To specify standards, e.g. for nutrition, food quality and environmental care, required in food purchased by government departments and some other public bodies	DEFRA DHSC PHE
Rural Issues	Rural Proofing	To monitor impacts of policy on rural areas, including access to food	DEFRA DHSC MHCLG

Source: Author

Figure 2.

Selected issues with good connections in England's national food policy

N.B. Two other issues found to be well connected - Brexit and Climate Change - had multiple connections and are not shown here.

Source: Parsons, K. (2021) How connected is national food policy in England? Rethinking Food Governance Report 2. London: Food Research Collaboration.

Figure 3. Policy issues and government departments working on connected policy-making in England

POLICY ISSUE	Departments
Agricultural Technology	Business, Energy & Industrial Strategy; Environment, Food & Rural Affairs; Commonwealth & Development Office Foreign
Animal and Plant Health	Business, Energy & Industrial Strategy; Environment, Food & Rural Affairs; Commonwealth & Development Office Foreign; Food Standards Agency; Public Health England
Anti-microbial Resistance	Environment, Food & Rural Affairs; Health & Social Care; Commonwealth & Development Office Foreign; Food Standards Agency; Public Health England
Brexit	Multiple Departments
Childhood Obesity	Cabinet Office; Digital, Culture, Media & Sport; Environment, Food & Rural Affairs; Education; Health & Social Care; HM Treasury; Housing, Communities & Local Government; Public Health England
Climate Change	Multiple Departments
Food Labelling	Environment, Food & Rural Affairs; Health & Social Care; Food Standards Agency; Public Health England
Public Food Procurement	Environment, Food & Rural Affairs; Health & Social Care; Public Health England
Rural Issues	Environment, Food & Rural Affairs; Health & Social Care; Housing, Communities & Local Government

DEFRA's examples of connected working on food policy issues

England's main food policy-making department, the Department for Environment, Food and Rural Affairs (DEFRA), is unusual in that it has specifically identified in reports where it works on food issues with other departments. These are summarised in Table 2. DEFRA describes its portfolio as 'large and complex, with multiple interdependencies within DEFRA and with the work of other government departments'[15]. However, as the FRC report *Who makes food policy in England*[16] showed, food-related policy-making spans at least 16 departments as well as numerous public bodies, so DEFRA's list is not exhaustive.

Table 2: Food policy issues on which DEFRA has said it works jointly with other departments

Policy issue	Department(s) DEFRA works with
Some trade issues	DIT
Aspects of oceans policy	FCDO (and Devolved Administrations)
Climate Change (reduction of greenhouse gas emissions across DEFRA's sectors - agriculture, waste, fluorinated gases, forestry and land use) Greening Government Commitments (which set out the actions UK government departments and their agencies will take to reduce their impacts on the environment)[17]	BEIS
Antimicrobial resistance	DHSC, Medicines and Healthcare Products Regulatory Agency, FCDO
Consumer interests on food safety, compositional standards and labelling	DHSC; FSA
Labour requirements for DEFRA's sectors Skills relevant to DEFRA's sectors	Home Office, DfE (and industry)
Industrial Strategy (ensuring Industrial Strategy Challenge Fund 'Transforming Food' programme meets sector needs)	BEIS
Rural communities	'Other government departments'

Source: Author from DEFRA Annual Report 2017-18 and Single Departmental Plan (2018)

Policy issue 1: Agricultural Technology

Example of connected policy-making: Agri-tech Strategy (ATS)

The application of technology to agriculture, to improve productivity or sustainability, covers a range of types of technology, including those addressing: nutrition, genetics, informatics, satellite imaging, remote sensing, meteorology, precision farming and low impact agriculture[18]. Because this issue crosses several departmental remits, including DEFRA for agriculture, and BEIS for
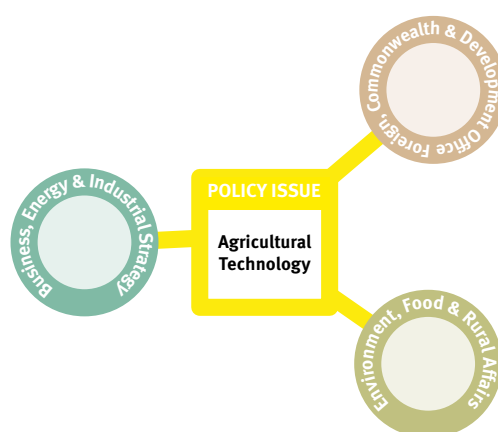
industry and innovation, as well as different types of stakeholder, an Agri-tech Strategy was developed in 2013 to bring together UK Government, scientists, and the food and farming industry, and 'identify and develop the opportunities and strengths of the UK agricultural technologies' sector as a whole. The policy's aim is to promote agricultural technology, innovation and sustainability, and to boost the economic potential of the UK agricultural technology sector (for example by developing technology to improve yield or efficiency). DEFRA and BEIS (then BIS) began working together on the ATS in 2013, on the following components:

- A 'Catalyst' proof-of-concept fund of £70m, with a focus on international development objectives;
- A £90m investment to establish a small number of 'Centres for Agricultural Innovation' to support advances in sustainable intensification – for example The Centre for Innovation Excellence in Livestock;
- 'Internationalisation actions' on exports (for example to support UK agri-tech companies seeking to export to target markets overseas, and including working with foreign governments to help them deliver their food security programmes);
- Investment advice and support to potential inward investors in the agri-tech sector[19].

The ATS created a joint team between BEIS and DEFRA on delivery[20], while FCDO's involvement is due to Catalyst funding for projects overseas.

Policy issue 2: Animal and Plant Health

Example of connected policy-making: UK Partnership for Animal and Plant Health

Diseases in animals and plants can have impacts across the economy, environment and society (including on the health of people), so policy efforts have been made to build resilience to threats from animal and plant disease through connecting a wide range of bodies from the public, private
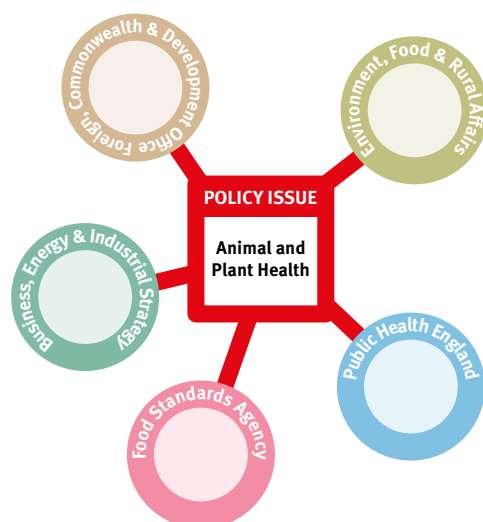
and charitable sectors. Issues around animal and plant health span: 'understanding public concerns, ensuring a discovery pipeline of new diagnostics, treatments and vaccines, through to the real-time epidemiology used to respond to disease outbreaks, disease response planning, and risk-based cross-border surveillance'[21]. The UK Partnership for Animal and Plant health was created to build more effective and coordinated systems of prevention, surveillance and response. The Partnership was born out of a 2014 joint DEFRA and Government Office for Science (GO-Science) report on the topic[22], and brings together public research funders and wider research stakeholders[23]. The *Vision and High-level Strategy for UK Animal and Plant Health Research To 2020 and Beyond* provides the rationale for connected working, asserting that 'the UK needs to develop a more integrated, whole-system approach to animal and plant health science'[24].

Policy issue 3: Anti-microbial Resistance (AMR)

Examples of connected policy-making: AMR National Action Plan; UK One Health Report; Global AMR Innovation Fund

AMR – the resistance of disease-causing microbes to the drugs, such as antibiotics, used to treat them – poses an escalating threat to human health. It is relevant to food because the overuse of antibiotics in animal husbandry has contributed
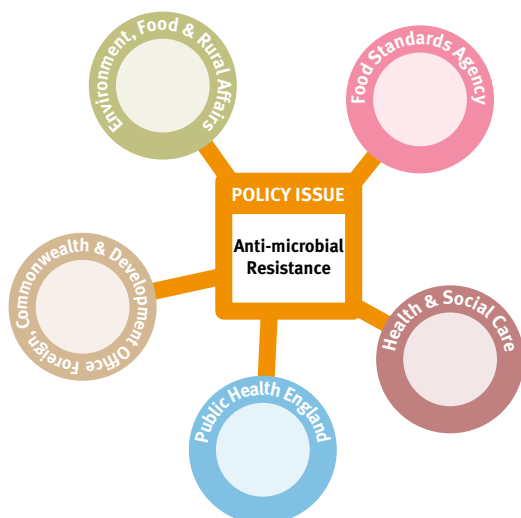
to the problem, and also because antibiotics are needed to treat food-borne illnesses. Policies have therefore been developed which aim to limit the use of antibiotics in all settings, to halt the rise of AMR. It is an issue which cuts across several departmental remits, including health (implications of resistance for treating human illness), agriculture (use of antibiotics in animal husbandry), the environment (pollution of waterways with antibiotic residues) and international development (tackling AMR in low and middle income countries). It also has trade implications, in terms of the standards relating to antibiotic use applied to any meat and dairy produce imported into the UK[25].

The need for a connected approach to tackling AMR was championed in 2011 by the Chief Medical Officer (CMO), who called AMR a 'ticking time bomb' and a 'threat arguably as important as climate change for the world' in her Annual Report[26]. The report recommended that the national approach should be managed jointly between DH [now DHSC] and DEFRA[27]. The five-year UK AMR strategy was launched in 2013, tackling AMR in humans, animals and the environment, and with a number of departments and agencies involved in steering and delivering the strategy, led by PHE, DHSC and DEFRA[28]. The latest progress report highlights 'continuing close collaboration between the animal and human health domains'[29]. One specific example is how, since 2014, PHE has worked with the Veterinary Medicines Directorate (an agency of DEFRA) on an 'Antibiotic Guardian'

campaign[30].

However, while cross-government work on AMR has increased since the 2011 report, there is evidence that policy connections on this issue could still be improved. In 2018, during a Select Committee inquiry, the then CMO underlined the need for 'more visible and active government leadership' not just from DHSC, but also from DEFRA and FCDO, arguing for 'Treasury funding rather than funding from the Department of Health and Social Care'[31], implying this would give the issue higher priority. The committee itself raised concerns that the DHSC minister with responsibility for AMR had reported having 'no official inter-ministerial meetings on the subject of AMR with his opposite number in DEFRA, FCDO or with the Prime Minister during the 15 months he has held the portfolio for this issue'[32].

Policy issue 4: Brexit

Example of connected policy-making: various

The UK's exit from the European Union involves the repatriation of responsibilities for multiple aspects of food policy which have previously been dealt with at the EU level. This has necessitated a significant amount of connected working between government departments, often involving DEFRA. For example, the NAO has highlighted how DEFRA's 'cross-government co-ordination on EU Exit' includes working with:

- HMRC and Border Force on customs and border controls issues;
- HO on migrant EU labour issues;
- DIT on trade relations;
- BEIS on chemical regulation, Euratom and the Emissions Trading System;
- DHSC on veterinary medicines, food safety and public health protection; and
- HSE on chemical and pesticide regulation'[33].

According to the NAO, 'in complex areas of policy where responsibility sits across a number of
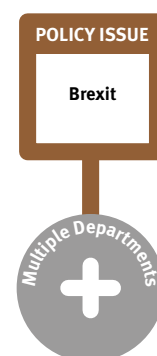
government departments, cross-departmental boards have been created to facilitate co-ordination'. Examples include boards for borders, devolution and legislation[34]. For these reasons, some interviewees pointed to Brexit as a catalyst for cross-government working on food. One interviewee commented that for DEFRA, one of Brexit's biggest impacts had been to bring food policy back onto the department's agenda, whereas previously, 'the FSA was pretty much delivering against all of the food policy requirements through its partnership with DH'. Now, the interviewee said, on food there were 'joint governance arrangements for all EU Exit projects between FSA and DEFRA', and DHSC and BEIS were brought in when needed.

Policy issue 5: Childhood Obesity

Example of connected policy-making: The Childhood Obesity Plan (COP)
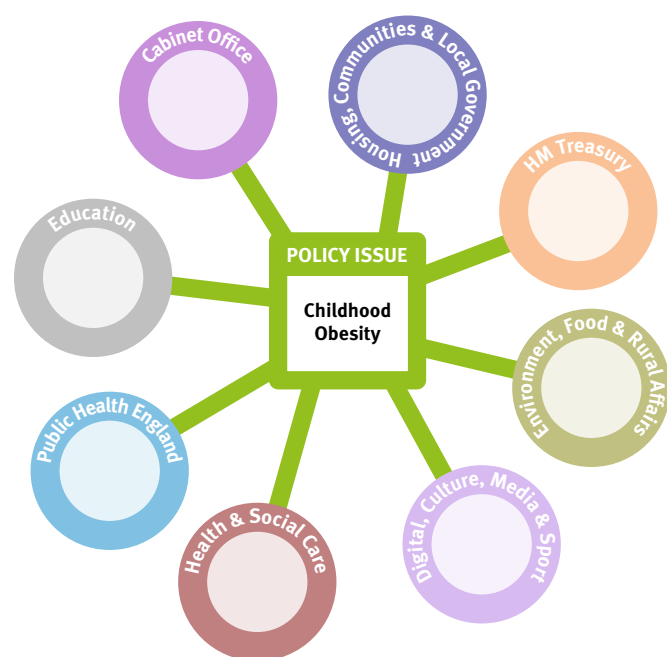
The rising level of obesity in children is one of society's most significant problems. Tackling obesity is increasingly understood as requiring the involvement of a much wider number of policy domains than health alone[35], because there are many influences on body weight, including the 'food environments' where people buy and eat food.

The Childhood Obesity Plan is designed to achieve this aim, and was the most significant piece of joined-up working on food identified in the mapping work, hailed as such by several interviewees, and described in a policy document as a 'joined-up, whole systems approach'[36]. The COP has several strands, to tackle different aspects of the problem, but these all involve more than one department, and the COP overall involves cross-departmental coordination.

In fact the first phase of the COP was criticised for being fragmented, despite its aims to be joined-up. A House of Commons Select Committee report commented that the policy remained 'primarily within the remit of the Department for Health' with 'little evidence that departments such as DCMS, DEFRA or DExEU/Trade are integrating public health or the Obesity Plan appropriately with their own strategies and plans'; there was also criticism of the DfE's failure to establish a Healthy Ratings Scheme for schools[37]. However, the second phase of the COP contains more evidence of a cross-government approach, and commentators were positive about its improved connectivity. In a 2019 report, DHSC described how 'government departments work very closely on tackling childhood obesity', and said that 'officials from across government meet regularly to drive progress' and ensure a coordinated approach[38].

Civil servant interviewees supported this, one noting that 'every department is contributing', with 'seven or eight departments working on it quite closely', making it, in the words of another interviewee, a 'completely cross-government strategy'. The COP was described as a 'game changer' in terms of connected policymaking, with one civil servant (who has been working on food for almost twenty years) praising 'a much greater and deeper join-up across government than I think I've ever seen … and not just at working level, at senior level, "perm sec" level, ministerial level'. Another said that 'as someone who's worked in policy for the last eight or nine years, this is the first time that I have seen an ambition to work across government actually be quite productive'. Usually,

this interviewee said, 'they put out intentions, we're going to work with so-and-so, and it just never tends to come through for one reason or another, whether that's logistics or conflicting agendas and ambitions'. (This highlights the fact that policy incoherence can have both practical and ideological causes).

However, this enthusiasm was not always matched in interviews with external stakeholders, with few proposing the plan as an example of policy 'connected-ness', and some expressing scepticism about how cross-government the COP is in reality. The efforts to connect do not, for example, appear to have extended as far as Health Select Committee recommendations for a 'Cabinet-level committee to review implementation of the plan, with mandatory reporting across all departments'[39].

The COP has several strands:

The Soft Drinks Industry Levy

One aim of the COP is to reduce children's consumption of sugar in soft drinks (one of the biggest sources of sugar in children's diets). The Soft Drinks Industry Levy requires soft drinks manufacturers to reduce sugar in their drinks or pay a levy, with the drinks highest in sugar being taxed at a higher rate. The programme is led by two departments – DHSC and HMT – with input from DEFRA.

The National Planning Policy Framework
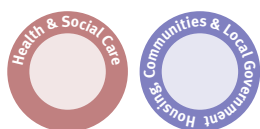
An aim of COP is to support the development of healthy food environments (meaning places where people buy food), to make it easier for people to choose healthy foods. This involves work between DHSC (health policy) and MHCLG

(planning policy) on the National Planning Policy Framework (the overarching document which sets out the government's planning policies for England), which specifies that planning decisions should support access to healthy food[40]. As part of this work, DHSC has committed to provide resources for Local Authorities and 'guidance and training to planning inspectors to ensure there is a shared understanding of the types of evidence that are required to support local policies to limit fast food outlets'. MHCLG will 'ensure these resources interact positively with existing planning policy and guidance to allow planners to utilise the most effective evidence with maximum impact'[41].

The Nutrient Profiling Model
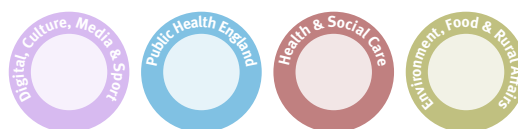
An aim of the COP is to restrict children's exposure to the promotion of unhealthy foods and snacks, crossing health and media policy remits. The Nutrient Profiling Model is the tool used to define what products can and cannot be advertised during children's programming. Work on the model is led by PHE, and involves (for example on the Nutrient Profiling Expert Group) DHSC, DCMS, DEFRA, and the devolved administrations according to an interviewee.

Natural Environment and Health
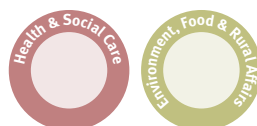
While it is not clear if any concrete action has been taken to connect these issues, the COP does highlight how 'exposure to the natural environment and green space is associated with lower levels of obesity and higher levels of physical activity', and flags up DEFRA's 25-Year Environment Plan as a piece of policy which addresses this. In line with this idea, the government's response to a Select Committee inquiry on childhood obesity policy

notes that links between health and the natural environment are being explored by DHSC and DEFRA and one of the commitments in the COP is to 'define a set of standards to demonstrate what "good" green infrastructure looks like'[42].

Policy issue 6: Climate Change

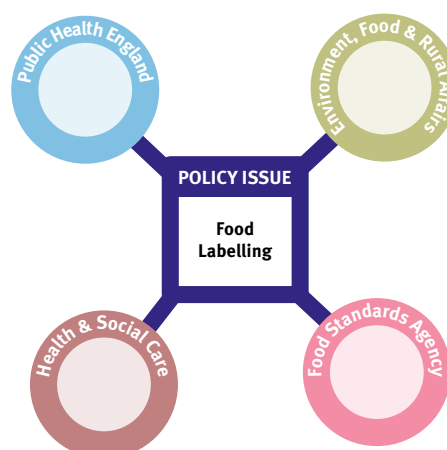### Example of connected policy-making: National Adaptation Programme

Climate change is a fundamentally cross-cutting issue, and there is now substantial evidence on the food system's contributions to greenhouse gas emissions and its potential for mitigating these impacts[43]. In response, there is some evidence of connected working, at least on adaptation (as distinct from mitigation, which is addressed below under disconnections). The government's National Adaptation Programme (NAP), which sets out what government, businesses and society are doing in response to the top risks identified in the government's Climate Change Risk Assessments, cites examples of cross-departmental working which involve or impact food. An example is joint work through the Marine Climate Change Impacts Partnership between DEFRA's executive agency CEFAS (Centre for Environment, Fisheries and Aquaculture Science), the Environment Agency (EA), PHE (public health) and the FSA (food safety) 'to improve understanding of and responses to climate change impacts on water-borne pathogens and harmful algal blooms'[44]. The NAP also highlights links between climate change adaptation policy and agriculture policy, such as those contained in the 25-year Environment Plan[45].

Policy issue 7: Food Labelling

Example of connected policy-making: Enforcement of EU Labelling Requirements; Allergen Labelling Review

Food labelling – an important part of the process by which food information is communicated to

POLICY ISSUE

Climate Change

Multiple Departments

POLICY ISSUE

Food Labelling

Public Health England

Environment, Food & Rural Affairs

Health & Social Care

Food Standards Agency

consumers – necessitates connected working because responsibilities for different aspects of labelling (such as on safety, nutrition and composition) are split between several different departments, primarily DEFRA (food composition and authenticity), FSA (safety) and DHSC (health)[46]. A recent example of connected work on labelling is the allergen labelling review and consultation, which involved the FSA in England, Northern Ireland and Wales, DEFRA, Food Standards Scotland and DHSC[47]. An interviewee described how DHSC and DEFRA work 'closely on all food labelling issues', including when providing input to the labelling committee of the international food standard-setting body Codex. However – as discussed in the next section – the division of responsibility for food labelling in this way can also be seen as an example of disconnected policy.

Policy issue 8: Public Food Procurement

Example of connected policy-making: Government Buying Standards for Food and Catering Services (GBSF)

Public procurement refers to the purchasing of supplies, services and works for the public sector, with government spend on food-related procurement (across schools, prisons, hospitals and other public bodies) estimated at over £2 billion each year[48]. Public procurement is relevant to several food issues, including nutrition, sustainability and production, crossing multiple departmental remits.
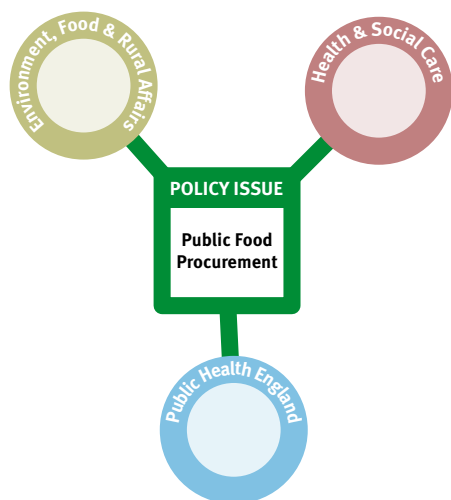
The Government Buying Standards are part of public procurement policy, and comprise a set of standards to guide the purchase of different categories of products [49]. The Government Buying Standards for Food and Catering Services (GBSF) were introduced in 2011 as a means of meeting the 'Greening Government Commitments'. Overall policy responsibility for the GBSF rests with DEFRA, while the DHSC has responsibility for the nutrition standards, taking into account advice from its public health agency, PHE[50]. In 2014, DEFRA introduced a Plan for Public Procurement which included a 'Balanced Scorecard'[51] approach to the procurement of food and catering services, aiming to balance considerations of: Production (at farm level); Health & Wellbeing; Resource Efficiency; Social & Economic Value; and Quality of Service Provision[52]. As a result, the GBSF require work between the departments dealing with environmental sustainability and nutrition, among others[53]. One interviewee described public procurement as 'a rare example of joined-up food policy', and said that cross-government working on it was 'better than it's ever been'.

Policy issue 9: Rural Issues

Example of connected policy-making: Rural Proofing

Rural areas – where much food production takes place – face particular challenges around distance,

population sparsity and demography, but rural needs can be overlooked in the development of policies. 'Rural proofing' refers to the process of assessing the effects of government policies on rural areas, and ensuring rural considerations are included. The 2015 independent 'Cameron' review emphasised that all government policies should make rural issues a routine consideration, and noted that while there was more work to be done to ensure rural issues were 'mainstreamed' in this way, there were arrangements in place which could help ensure policy is connected effectively: 'DEFRA already has several cross-departmental strategic relationships with, for example, the Department for Communities and Local Government, the Department for Transport and the Department of Health', whereby 'meetings occur at Director level on a quarterly basis and are attended by policy teams ... to ensure alignment of government-wide objectives and to foster closer and coordinated working'[54]. A specific example of where rural proofing is important for food policy is access to food retail outlets, 'which could be impacted indirectly by government policy[55].
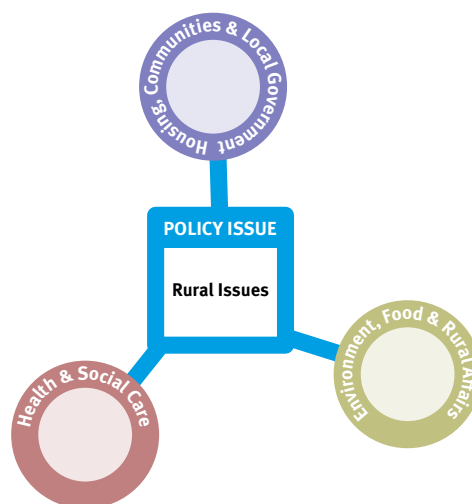
Part Two: Food Policy Disconnects

The 14 disconnected issues

Part One looked at examples of connected food policy-making. This section describes some examples of disconnections – situations where there was evidence of 'redundancy' (duplication, or unnecessary activity) because of overlapping responsibilities, or gaps where potentially constructive links appeared to be missing. Fourteen examples of food policy disconnects are summarised in Table 3 and Figure 4, and discussed in more detail in the subsequent sections.

In many cases, the disconnects reflect departmental demarcations, historic working practices, ad-hoc arrangements or failures in communication. However, some of the disconnects identified by interviewees involve more fundamental tensions, which were perceived as undermining a coherent, food-systems approach to policy-making. These examples go beyond a failure to connect policies to one another. They describe situations where there are underlying (potentially ideological) tensions between food policy goals, or where important food system impacts are absent (or excluded) from the food policy agenda. They raise questions about priorities, the power of different interests, and the reality that addressing food holistically will involve political choices. Efforts to achieve food system change must take account of these ideological and political challenges as much as the practical ones. Interviewees' comments show how this leads to a process of compromise.

It will be seen that some policy issues – such as labelling and the involvement of food in climate-change policy – appear in both Table 1 and Table 3. In other words, they are examples of BOTH connected and disconnected policy-making. This apparent paradox is due to the fact that in many situations, cross-government efforts to connect policy did exist, but were reported by stakeholders to be inadequate, or less effective than they could be. Figure 3 shows the selected issues, with broken chains representing the potential for connections.

Table 3: Selected food policy disconnects in England

Policy Disconnect	Details
Agriculture and Public Health	'Health in all policies' approach not extended to agriculture policy, despite arguments that public health should be a goal of agriculture policy, and classed as a 'public good'
	Incoherence of providing subsidies which support production of foods, such as red meat (feed and animals) or sugar, where dietary and /or environmental advice urges reduced consumption
	Prioritising economic growth over health
	Health policies focused on reducing consumption of unhealthy foods not production of healthier foods
	Public health policy being made without the involvement of agricultural stakeholders
Agri-tech and Rural Connectivity	Inconsistency between objectives to utilise agricultural technology and persistence of poor rural digital connectivity
Children's Food Interventions	Programmes such as Healthy Start Vouchers and Free School Meals spread across multiple departments

Climate Change	Failure to sufficiently integrate ambitions laid out by Committee on Climate Change into agriculture policy
	Support for high-impact forms of agriculture, e.g. livestock production (and aims to expand UK exports of high-impact products to other markets)
	Impacts of climate change on food security not sufficiently recognised
	Failure to balance agricultural production priorities and environmental priorities
Dietary Guidelines	Failure to include environmental impacts in official dietary guidance
	Failure to underpin other food policy with national dietary guidelines
	Failure to connect DEFRA's sustainable consumption recommendations to reduce meat intake to official dietary guidelines
Food Supply Chain Policy	Fragmented approach to the food chain by different government departments
Food Labelling and Composition	Responsibilities fragmented across multiple departments: resulting complexity and confusion highlighted in recent reviews of food allergen policy, and recommendations following the horsemeat scandal
Hunger	No department assigned responsibility for hunger
Innovation and Nutrition	Multiple activities involving different departments which could be better brought together
	Failure to prioritise nutrition in innovation objectives
Interests of different client groups	Different departments have links with different sectors (e.g. DEFRA to farmers, DHSC to healthcare providers), which can cause tensions
International Development	Failure to take into account coherence of domestic policy (in particular agriculture policy) with objectives (economic, environmental) of other (developing) countries
	Failure to recognise importance of supporting better production in developing countries, including tackling pests and diseases which may ultimately impact domestic interests
Land Use	Diverging interests across energy, transport, agriculture and environmental policy – and competition for land
Nutrition, Obesity and Income	Failure to include food poverty as a consideration in obesity policy
Trade	High domestic food production standards incoherent with a trade policy which permits lower standard food from elsewhere
	Failure to connect with health objectives around nutrition or food safety

Source: Author

Disconnect 1: Agriculture and Public Health

The disconnect between agriculture policy (perceived to focus on the production end of the food supply chain) and health policy (perceived to focus on the consumption end) was raised by several interviewees (predominantly from outside government). Their point was that agriculture policy seems not to take account of public health goals, despite the fact that agriculture consists largely of producing foods, and foods are the basis of health. One interviewee pointed to the need for 'an agriculture policy…that starts with what kind of things we need to be eating to improve the health of our population'. This interviewee commented that 'it doesn't seem like our dietary guidelines inform our food production policy in any way'. As a concrete example, the interviewee claimed that there had been an increase in production of

pulses in response to farm greening policies (which recommended incorporating pulses in a rotation system), but a missed opportunity to support healthier diets, because these were used to feed animals not people.

The failure to connect agriculture to health was also raised in the EFRA Select Committee's (2018) *Future for food, farming and the environment* report, which noted that the the DEFRA Health and Harmony discussion paper on agriculture policy lacked 'discussion of wider food policy and has failed to link agricultural policy to wider public health goals and reducing diet-related diseases'[56].

One of the most commonly cited examples of the policy disconnect between agriculture and health concerns sugar. For one civil society interviewee, this was a clear example of disconnected policy-making resulting in policy incoherence, because it was 'bonkers' that farmers were supported to grow sugar beet (via the CAP Basic Payments Scheme), when sugar beet production led to both soil erosion and water pollution, which in turn led to clean-up operations by water companies which were paid for by customers. And then, 'at the same time as all that's going on, we enact a sugar tax' (as a health policy) which seems like 'disconnected policy-making at its worst'. DEFRA itself has acknowledged the fragmentation, a result, it says, of the fact that 'sugar engages a wide range of interests in the UK and worldwide'. It explains that 'DEFRA leads on sugar as an agricultural product, but there is strong interest from DIT and FCDO, because of the importance of UK sugar cane imports to the economies of a number of developing countries. DHSC also has a strong interest because UK sugar consumption exceeds recommended levels and has been linked to childhood obesity'[57].

This disconnect was often positioned as part of a wider tension between health goals and economic goals, summed up by the interviewee who said, 'there are huge benefits of getting environment, health and the production of food aligned [but] the bottom line is you need farmers to do this stuff ... and they've got to be able to turn a profit'. A civil service interviewee said incoherence was inevitable

if the function of one department was 'to promote a healthy balanced diet and improve the health of the population' while the function of other departments was 'to support and grow the UK food industry'. To illustrate this tension, one interviewee cited the example of obesity ('You've got a department that is driven by what the industry wants, which is DEFRA, which [might] not necessarily tie in with what the Public Health Minister wants') and another mentioned meat (there are arguments that red meat consumption should go down, for health and environmental reasons, yet 'DEFRA is still trying to find a fix that will keep beef farmers onside'). DEFRA and the government more broadly were seen by several interviewees to champion economic rather than health interests. One said, 'given a choice between economic growth...and health, government would always go with economic increase, unless there was a really strong argument not to').

Civil society interviewees argued that the disconnect was exacerbated by public health policy being made without the involvement of agricultural stakeholders. One interviewee commented that whereas stakeholders from the food manufacturers' and retailers' trade associations would always be 'in the room' while policy was being made on, say, reformulation or marketing restrictions on unhealthy foods, health officials would be much less likely to have 'stakeholders like the pulses growers or the sustainable fish producers or the fruit and vegetable growers in the room' while setting policy.

Brexit had been seen by some as an opportunity to fix this disconnect. They noted that the consultation document on post-Brexit agriculture policy was titled *Health and Harmony: the future for food, farming and the environment in a Green Brexit.* But many stakeholders were disappointed to discover human health did not feature in the policy. An interviewee's comment sums up the sense of frustration: 'When you hear what DEFRA are saying, they don't mention health. They don't mention food. It's all about agriculture. It's all about increasing brand Britain'.

Figure 4.

Selected issues with scope for better connections in England's national food policy

Environment, Food & Rural Affairs

International Trade

Food Standards Agency

Commonwealth & Development Office Foreign,

Transport

Justice

HM Treasury

Housing, Communities & Local Government

Cabinet Office

Education

Business, Energy & Industrial Strategy

Public Health England

Home Office

Work & Pensions

Digital, Culture, Media & Sport

Health & Social Care

POLICY ISSUE Children's Food Interventions

POLICY ISSUE Interests of different client groups

POLICY ISSUE Agriculture and Public Health

POLICY ISSUE Food Supply Chain Policy

POLICY ISSUE International Development

POLICY ISSUE Climate Change

POLICY ISSUE Innovation and Nutrition

POLICY ISSUE Land Use

POLICY ISSUE Nutrition, Obesity and Income

POLICY ISSUE Agri-tech and Rural Connectivity

POLICY ISSUE Food Labelling and Composition

POLICY ISSUE Hunger

POLICY ISSUE Dietary Guidelines

POLICY ISSUE Trade

ENG

Source: Parsons, K. (2021) How connected is national food policy in England? Rethinking Food Governance Report 2. London: Food Research Collaboration.

Disconnect 2: Agri-tech and Rural Connectivity

While rural proofing is listed in this report as an example of connected working, it is also raised as the site of a disconnect between departmental objectives and activities around rural issues. One interviewee pointed to the disconnect between the slow rollout of 5G connectivity in rural areas (led by DCMS) and work on agri-tech (led by BEIS and DEFRA): 'You've got part of government saying agricultural technology is really great, investing all this money, and then you've got another [part] saying you can't have rural connectivity'.

This disconnect has been raised by, among others, the National Farmers Union, which has argued that though a wide range of farming businesses could benefit from these technologies, farmers in particular are in need of better connectivity and higher speed broadband, to be able to improve their performance in ways being encouraged by policy (for example on environmental impacts, where data collection is important)[58]. It is estimated that '13% of farmers still don't have reliable access to the internet and 60% of those with a connection only have speeds of 2Mbps, insufficient to deal with the data-heavy maps drones and sensors will generate'[59].

Disconnect 3: Children's Food Interventions

The disconnect here is between different departments involved in tackling poor diet among children. The state provides free food for children in some circumstances, and regulates the provision of food to children in some settings, but these activities are split between departments. DfE is currently responsible for overseeing school food, which includes Free School Meals and Breakfast Clubs, while DHSC has responsibility for Healthy Start vouchers (which entitle low-income and young parents to some free milk, fruit and vegetables), and DEFRA leads on the School Milk and Fruit and Vegetable scheme. This fragmented approach has been criticised, for example, by

the Food Foundation think tank, which described public policy in this area as being developed and implemented in an 'uncoordinated manner across multiple departments and agencies' with 'no structure currently in place to ensure policy coherence'[60]. An interviewee summed it up as 'a bit of a mess' and commented that 'if you were re-designing the approach to this area of food policy you wouldn't start with this, you'd start with some other kind of more coordinated offer'.

Disconnect 4: Climate Change

There is some evidence of connected working on climate change, as noted in Part 1. However, there is also a perception that current food policy fails to take sufficient account of the UK's climate goals. The disconnect was raised by the government's advisory body, the Climate Change Committee (CCC), which stated that the Common Agricultural Policy (which until Brexit was the primary agricultural policy in England) and its predecessors had caused 'significant environmental damage'. The Committee concluded that DEFRA and Devolved Administration policies were insufficient to meet climate targets, and urged policy-makers to integrate environment and climate policy goals into agriculture policy[61]. The need for greater coherence between agriculture and climate policy was given fresh impetus in January 2020 with the publication of the CCC's *Land Use Policies for a Net Zero UK* report, which reported that current land use policy measures 'would not deliver the required ambition'[62]. The report recommended a range of new policy measures affecting both production and consumption – and requiring connected working across government for implementation. For one civil society interviewee, there was a 'huge tension' between agricultural policy and climate issues, with government subsidies primarily targeted at high-impact types of farming, mainly livestock: 'This is the direct opposite of the policy that is coming out of the Climate Change Committee and the Climate Change Act. It makes absolutely no sense … We're pulling in very different directions'.

A parallel disconnect has been identified in the failure of agriculture policy to take into account the predicted impacts of climate change on agriculture. The Environmental Audit Committee's (EAC) 2019 *Our Planet Our Health* inquiry concluded that 'the UK Government [had] ignored advice on food security from the Committee on Climate Change', and was 'complacent about the risks to food security posed by climate breakdown'.[63]

This disconnect is part of a wider tension between agricultural production priorities and environmental priorities to protect biodiversity, soils and water quality. This tension has been recognised for many years, and successive policy initiatives have attempted to link the issues, such as the CAP-related agri-environment schemes, the 2002 *Strategy for Sustainable Farming and Food*, the 2006 *Food Industry Sustainability Strategy* and the 2012-13 Green Food Project[64]. Nevertheless, there is a persistent criticism that the two policy agendas are not well enough connected to be mutually reinforcing. On one hand, some commentators continue to argue that food policy neglects the ecological impacts of food production and consumption[65]; on the other, there is criticism that environment policy can overshadow food and farming. Several interviewees raised this, with one commenting, 'the classic thing that happens is the Environment Secretary is reminded by a stakeholder a few weeks into the job [that] you're food and farming, you know, as well as environment'. The tension continues to be apparent in the arrangements being put in place for post-Brexit agricultural and environmental policy. For example, it is proposed that subsidy payments to farmers and landowners (replacing CAP payments) will be paid for 'public goods', most of which are environmental. This has rekindled arguments that DEFRA is neglecting its responsibility for (sustainable) food production[66]

Disconnect 5: Dietary Guidelines

Two disconnects were identified around dietary advice: the failure to connect the nutritional aspects of dietary advice with the environmental impacts of dietary choices; and a broader disconnect between the national dietary guidelines and other food policy. These were seen to lead to policy incoherence in relation to the aim to achieve a healthy and sustainable food system.

England's dietary advice is embodied in the Eatwell Guide, 'a policy tool used to define government recommendations on eating healthily'[67], produced by PHE. Until recently, government dietary advice concerned itself solely with the nutritional aspects of diet, but there was growing criticism that it was incoherent to recommend consumption of certain foods where production of those foods might be driving environmental damage and climate change. Consequently, there have been tentative steps towards connecting these policy areas, and recognising the environmental impacts of diet in the Eatwell Guide. For example, foods that are considered to be environmentally sustainable – such as beans and pulses –- are given greater emphasis[68].

But for some this step towards improving policy coherence has not gone far enough. Two examples of persistent incoherence concern meat and fish consumption. On meat, civil society groups have pointed out that there is no recommendation in the Eatwell Guide to eat less meat overall, even though meat production and consumption are widely seen as a major source of diet-related greenhouse gas emissions. On fish, there is an emphasis on eating at least two portions a week, 'but experts have observed that if the global population did so, there would be insufficient fish stocks'[69].

The need to better connect food sustainability issues with health was a conclusion of a 2019 EAC inquiry, which recommended that 'Public Health England's Eatwell Guide should be revised to emphasise foods with lower environmental footprints and make clear recommendations to help the public choose healthy and sustainable diets'[70]. An underlying cause of this example of policy incoherence was highlighted by the interviewee who commented that departments could disclaim responsibility where a policy was perceived to be 'owned' by another department.

Although there were representatives from DEFRA on the group updating the Eatwell Guide, the interviewee said, it was published by PHE, 'which [was] a shame, because then it's hard to go and speak to DEFRA about it because they're like, oh well, that's the Department of Health and its agency's responsibility, nothing to do with us'.

The issue of cross-departmental ownership for dietary advice overlaps with the second disconnect identified – that food policy across the board should be underpinned by the Eatwell Guide, and all policy interventions should be assessed for coherence with the guidelines. For example a Chief Scientific Advisor to DEFRA, Professor Ian Boyd, noted that 'if we all ate the Eatwell Guide diet we would do a lot more good to the environment[71]', and went on to ask how this could be achieved in ways that were 'congruent' with the needs and processes of the food industry. Similarly, trade policies, new product development by food manufacturers, or food poverty interventions could be connected by tailoring them to cohere with health objectives as enshrined in the Eatwell Guide[72].

Disconnect 6: Food Supply Chain Policy

On the food industry (as distinct from agriculture), interviewees highlighted a disconnect between the food-related policy activities taking place in DEFRA and BEIS. DEFRA was described by one interviewee as 'wanting to do their food sector deal for manufacturing separate to what the broader government plan is on manufacturing'. The two departments were said by interviewees to have inconsistent approaches to supporting change in the food sector, in terms of which method of working with stakeholders is most effective, with 'DEFRA looking after all farmers', whatever their size or potential, and BEIS directing its resources to businesses which are likely to have most significant results. These comments were made by civil servants, but policy fragmentation is a problem also raised by the food industry itself. For example, a consultation submission by the manufacturers'

trade association the FDF states that individual initiatives are not being 'properly coordinated across government to provide joined-up support for industry's own efforts'.

The same FDF document criticises how 'support for agriculture and fisheries has tended to focus on securing returns for those directly engaged in those sectors, rather than helping to orient production and output to match market needs'. This points to another disconnect – between production and markets. The FDF document says policy 'has lacked a whole chain approach' compared to competitor countries'[73]. Examples provided include The Netherlands, which reportedly has a Sustainable Food Alliance, sponsored by the Ministry of Economic Affairs, to address the needs of the whole agri-food chain. In the UK, by contrast, 'and in England specifically, many of these issues are shared between local and central government and between a number of different lead departments, where policies are developed in isolation, without taking specific account of the needs of individual sectors or interactions with other policy aims'[74].

Disconnect 7: Food Labelling (and Composition)

Food labelling is a good example of where there is already some connected working (as outlined in Part 1), but potential for more. This was clearly illustrated during the 2013 'horsemeat scandal', when items on sale in the UK labelled as containing beef were found to contain undeclared horsemeat. The splitting of the food labelling and composition policy remit across departments – presented in Table 4 – was criticised by the National Audit Office in its review of the horsemeat episode, for creating confusion which impeded appropriate responses[75].

Stakeholders reported 'confusion over which government department or agency should be their point of contact', and in reality, while responsibilities for food safety, composition and authenticity issues are divided institutionally, they intertwine, as 'the horsemeat incident turned out to be primarily authenticity (substitution of beef with

horse) but the possibility of phenylbutazone (bute) contamination meant it could have been a safety issue'[76]. The report of the Elliott Review into the Integrity and Assurance of Food Supply Networks (prompted by the horsemeat scandal) underlined the need for a 'co-ordinated, joined-up approach across many government departments'[77]. The Elliott review also criticised 'a lack of arrangements 'for regular, high-level, round-table meetings' between relevant departments'[78].

An interviewee reported similar difficulties arising from the fragmented responsibilities for labelling in the context of dealings with the Codex Committee on food labelling, whose broad remit meant that officials from different UK departments needed to be involved.

Table 4 Policy responsibility split on food labelling in England

Department	Aspects of policy for which department is responsible
FSA	Food safety; investigation of labelling-related incidents in the UK, including misleading labelling and food fraud
DEFRA	Food composition and authenticity in England, where this does not relate to food safety or nutrition
DHSC	Nutrition and health claims
PHE	Identifying and investigating outbreaks of food-borne infection
LAs	Delivery and enforcement of food safety and food authenticity, tasked by and submitting results to FSA

Source: National Audit Office, 2013[79]

Disconnect 8: Hunger

While there is no single measurement for hunger in the UK, a 2018 report by the Food and Agriculture Organisation estimated that 2.2 million people in the UK were severely food insecure[80]. The issue of hunger has been identified as one which 'falls between the cracks' of current food policy because it crosses departmental remits but no department is assigned lead responsibility. The Food Foundation think tank has been vocal about this lack of accountability, in particular criticising the lack of a designated lead[81]. The disconnect was a focus of a recent EAC inquiry into hunger and food insecurity in the UK. The Committee questioned ministers from FCDO, CO, DWP and DEFRA about who had responsibility for tackling these problems, and was told it was a 'a cross-cutting government responsibility' on which DEFRA was taking the lead. However, the Committee noted that 'tackling hunger does not feature in DEFRA's Single Departmental Plan'; and while Single Departmental Plans show 'quite a strong response on childhood obesity and quite a strong response on directions of travel on sustainable agriculture ... food insecurity and food poverty [are] absent in terms of laying out what the government is going to do in this area'[82]. The Committee's report concluded that 'despite the need for joined-up cross-government action, hunger and food insecurity [have] fallen between the cracks in government plans'. The report noted that the government 'continues to see hunger and food insecurity as overseas issues, with FCDO the only department to include them in its Single Departmental Plan'[83].

Disconnect 9: Innovation and Nutrition

Innovation refers to the continuous process of developing new products and solutions, and can be seen as a driver of growth or change. In the food sector, although some work is taking place to direct innovation towards products and processes that meet nutrition goals, these efforts are patchy, and there are arguments from the food industry that more could be done to put the power

of innovation behind efforts to achieve nutrition and health policy goals. The food manufacturers' trade association the FDF has highlighted the opportunity for the food and drink sector to make manufactured foods healthier, but says 'this is an area that requires government support and commitment'. Possible innovations could include 'high-value, nutritious food ingredients' made from UK agricultural and food-processing by-products[84]. The Childhood Obesity Plan also contains an aim to 'encourage the next generation of innovation in science and technology to allow industry to create healthier, more sustainable products' and mentions a £10 million collaborative research and development competition – run by the UK innovation agency Innovate UK, now part of UKRI – 'to stimulate new processes and products to increase the availability of healthier food choices for consumers and open up new markets'[85]. However, the impacts of these activities, particularly in relation to childhood obesity objectives, are not clear, leading academics to brand this aim of the Childhood Obesity Plan as having failed to fulfil its potential[86].

The disconnect is also manifest in the food industry's claim that nutrition policy can undermine innovation. The FDF argues that 'several health regulations currently act as barriers to innovation: consumer acceptance is said to require gradual reformulation, but legal reduction claims may call for a swifter change. This discourages innovation as it fails to incentivise the industry to invest in gradual reformulation[87]. The FDF argues that cross-government work is needed: DEFRA could help by 'lobbying … other government departments to help make innovation a reality in areas which do not fall under its direct area of responsibility', for example, lobbying DHSC to show how health policy could influence innovation in the food and drink industry[88].

Disconnect 10: Interests of Different Client-groups

This disconnect arises from the fact that different departments have different 'client groups'. Each

department is connected to a set of interest groups: DEFRA to farmers; DCMS to media companies; DHSC to healthcare providers; DfE to education professionals. These obligations create tensions when issues span multiple interests. Interviewees explained how 'competing interests' could cause difficulties – for example, as one said, when 'DCMS is looking at the interests of the advertising industry' when considering policy restricting the promotion of products deemed harmful to health, which meant the reaction could be, 'that'll be the end of ITV', rather than considering whether it would be good for public health. These tensions were a political reality that had to be continually negotiated. For one interviewee, the tension becomes critical once you move from civil servant to ministerial level, because compromise may be more difficult: 'When you have [an agriculture] minister who says, I'm going to be judged on whether I keep the farmers happy, and a minister of health who has a completely different set of interests, it's difficult to see how they would work together to [satisfy] both of their interests simultaneously'. According to another interviewee, the same tension runs through policy relating to food company sponsorship (where company branding is used on goods, or at activities or events) which is dominated by global brands with financial motives, so 'trying to instil good dietary habits [is] not their primary interest'. Another example concerned school food standards, where an interviewee said that DHSC and PHE pushed for them to be made mandatory, because of their focus on health outcomes, but DfE resisted because schools were 'already overburdened with policy'.

Disconnect 11: International Development

The term 'Policy Coherence for Development'[89] refers to the aim to prevent negative side effects, or 'spillover effects', of domestic policies on development policies – a type of policy incoherence[90]. A 2014 OECD policy coherence review found the UK government lacked 'a comprehensive approach to ensuring its development efforts are not undermined

by other government policies' and called for expanded cross-government working[91]. Similar issues were raised in a more recent report by a UK stakeholder network, UKSSD, reviewing progress on the global Sustainable Development Goals[92]. The lack of UK policy interest in overseas agriculture was also noted by an interviewee, who suggested the disconnect between domestic and overseas agriculture undermined a more coherent food systems approach to policy. The interviewee highlighted the potentially damaging consequences, especially in relation to animal and plant health issues in developing countries, because so many of the risks associated with agriculture 'are no longer constrained by national boundaries', so a more coherent approach would involve better recognising the implications for domestic agricultural objectives.

Disconnect 12: Land Use

The wide range of competing uses of land, including competition between using land for food production or for other purposes such as housing, has been recognised in a number of reports as a source of policy incoherence, as different departments try to manage the claims of different sectors. A recent report on land use pressures by civil society group Sustain argued that 'a new and coherent approach to land use' is needed[93]. There have been calls for a framework to coordinate land use policy, including in the GO-Science 2010 Foresight report on land use. This noted how 'responsibilities for energy, transport, agriculture and environmental policy, and the land use implications involved, are divided between different government departments and involve different institutional arrangements' and found that 'mechanisms for ensuring that a coherent and consistent approach to policy-making is taken, across these different sectors, are needed'[94]. An interviewee said that addressing the tensions over land use: 'would mean actually linking your housing plans with your urban development plans with your rural plans with your farming policy. And those are departments which don't speak to each other'.

Disconnect 13: Nutrition, Obesity and Income

There are increasing calls for food policy to better connect the cost of food with nutrition goals, in recognition of the fact that healthier diets tend to be more expensive than less healthy ones[95]. Analysis of the costs of the Eatwell Guide recommended diet found that 'on average, the poorest half of households in the UK would need to spend close to 30% of their disposable income to meet the government's dietary recommendations', compared to 12% for the richest half of households. The authors concluded the findings were a 'stark indication of the challenges low-income households face in affording the government's recommendations for a healthy diet', noting that the 'unaffordability of a healthy diet for low-income households in the UK is clearly evidenced in childhood obesity statistics', with childhood obesity in the most deprived areas double the rate in the least deprived areas in England[96].

This points to a need to connect policy on nutrition, and policy objectives around reducing obesity, with policy on food access, and welfare policy more broadly – specifically, people's ability to afford the food recommended for healthy weight. The EAC 2019 inquiry into hunger and food insecurity noted that 'while government is aware of the scale of obesity, it has not yet contextualised it within the framework of hunger, food insecurity and malnutrition in the UK'[97]. The Committee recommended 'that the government update its obesity strategy to take account of the close relationship between obesity, hunger, food insecurity and malnutrition in the UK'[98]. The disconnect is also about how welfare payments are disconnected from food prices, and a failure to account for the need to be able to access, and afford, food under the current benefits system[99].

Disconnect 14: Trade

A disconnect which has been magnified by Brexit is the one between agriculture policy and trade policy – strongly affected by the UK's withdrawal from

EU rules governing both. Tensions between policy on domestic food and feed production and policy on trade (in other words, food and feed imports) are also at the heart of debates over the most effective food security policy for the UK at country level. Incoherence between these two policy areas arises from the desire on one hand to protect high domestic animal welfare, environmental and safety standards and the desire on the other hand to be free to import products which might not meet the same standards. One interviewee contrasted the political objectives of the ministers for agriculture and trade, noting that if the minister for agriculture 'drives farming to be high welfare, high environmental standards, high price, low volumes' the minister for trade 'is going to drive trade deals which produce crap food cheaply'.

Trade policy was also regarded as being problematically disconnected from health objectives, again particularly as a result of Brexit, and specifically with regard to food standards. One interviewee remarked that 'trade, obviously, certainly in this world of Brexit, sees food as a tradeable commodity, but [is] not interested in food from a nutritional perspective'. This, the interviewee said, risked a situation where some of the food in the shops would be expensive and high-quality, while some would be 'cheap and really horrible but widely available'[100]. Interviewees inside government worried that trade policy may not be connected to nutritional or food safety objectives, meaning standards might not be protected, or might be sacrificed in order to secure overseas markets for UK services, telecommunications, IT or finance. One said: 'the reality is, if we're doing different sorts of deals, with bigger players, who's going to set the conditions or the terms or the quality standards?'

Interviewees also highlighted another disconnect between trade and health policy, this time in terms of international impacts. The concern here was that UK trade policy was not connected to development objectives in support of the SDGs and the UN declaration on non-communicable diseases[101] (NCDs). A civil society interviewee commented that currently the UK's leading food and drink exports include meat, soft drinks, biscuits, cakes and chocolate: 'This is just contributing to NCDs in other parts of the world. I don't think our strategy of growth in this country should be predicated on making other populations unhealthy and increase their consumption of these unhealthy products'.

Since the fieldwork for this report was conducted, a new Agriculture and Trade Commission[102] has been established, to represent farmers, retailers and consumers in the UK, 'advising Government on trade policies to adopt to secure opportunities for UK farmers'. However it has been criticised for failing to prioritise public and planetary health objectives, leading to the creation of an alternative commission to represent the public's interests[103].

Vertical Disconnects

This report focuses on the connects and disconnects in food policy issues across 'siloed' departments at the *same level of governance*, namely England. This is about 'horizontal' connections. But the need to better connect work going on at *different levels of governance* also emerged from the research – in other words, there need to be better 'vertical' connections in policy making, to produce coherence between policies at the levels of UK, England, the Devolved Administrations (Scotland, Wales and Northern Ireland) and Local Authorities (LAs).

This was raised in respect to several policy issues, including food safety, public procurement and obesity. On **food safety**, the disconnect arises between the FSA at national level and enforcement at Local Authority level, where, according to one interviewee, LAs 'could have a slightly different interpretation of central FSA rules and regulations'. This means neighbouring counties may do things

slightly differently, 'so if you've got a farm that crosses borders you'll get different advice from the FSA. On **public procurement**, there was a view that national-level policy was being hampered by poor connections to local implementation, which is 'massively fragmented', an interviewee said, with decision-making powers nominally held by LAs but in practice delegated to contract caterers, leading to variations in standards between LAs or even between schools within LAs, with poor coordinating powers at central government level.

Similarly on **obesity** policy, a disconnect has been raised between the ambitions of national policy and the powers available for implementation at local level. For example, it has been argued that national government could make it easier for LAs to limit the proliferation of unhealthy food outlets in their areas and limit the prevalence of HFSS food and drink billboard advertising near schools[1]. Evidence submitted to the Health and Social Care Committee inquiry on childhood obesity pointed out that while LAs 'have levers available that can change how the local system functions – including how to create a healthier local environment', their powers are limited by geographical and political boundaries, and they 'cannot change all elements of their local systems, [which] require action and support from national government'. As part of a larger, whole-systems approach, the submission argued, 'national government could bring their stakeholders together – from across sectors and governmental departments (e.g. DHSC, DfE, DFT, DEFRA, DWP, MHCLG, etc.) – to drive a national agenda which guides parts of the system that lie outside of the LA control (e.g. media advertising, food packaging, food re-formulation, food trade agreements, etc.) [2].

There is also a perception, articulated for example in the 2017 UK grassroots People's Food Policy, that the growing number of local-level food policy activities requires better mechanisms to link them in to national level. It found that 'local policies do not currently feed into central government food policy development. There is consequently **no mechanism for food-related policies at local and national levels of government to be linked together to create clarity and co-operation**'[3].

Finally, there is fragmentation between the different food-related objectives and activities taking place at national level in England and in the **Devolved Administrations**. While a review of how food policy activities are being connected between the different nations was beyond the scope of this research, there was a general suggestion from the interview and documentary data that the multiple approaches to agriculture policy, health policy and food standards across the devolved regions and at Westminster added to the fragmentation of food policy. For example, Scotland has its own national food policy in development – the Good Food Nation policy – as does England (the National Food Strategy), Northern Ireland has announced it will be developing a national integrated food policy, and Wales is currently developing its latest plan. Along with these different strategic approaches, there are inherent tensions around the balance of power on food policy, with some food-related responsibilities devolved and other issues centralised in Westminster. These tensions have been magnified by Brexit, with agriculture and trade being particular points of difficulty in terms of different approaches in the different nations. Food and feed safety and standards are also devolved matters, and responsibilities are shared between the Food Standards Agency and Food Standards Scotland. This is reported to lead to disconnections; for example, in Wales, it has been argued that delivering joined-up policies and services is undermined by an FSA primarily driven by an English perspective [4].

An Inter-Ministerial Group for Environment, Food and Rural Affairs (IMG-EFRA), does exist to connect

the devolved administrations with DEFRA; it was established in 2016 to co-ordinate and promote greater collaboration in areas of shared interest. A revised, more formalised set of terms of reference was agreed in February 2019 and the group is said to meet approximately every six to eight weeks, supported by a senior official level structure[5]. However, the albeit brief minutes of the group underline weaknesses in collaboration: for example on the government's Internal Market Bill, where Scottish and Welsh Ministers stressed their deep concerns and continued opposition to the Bill as 'breaking international law and undermining existing devolved settlements'[6] and the absence of any meaningful consultation on border proposals between Great Britain and the EU [7].

1 HOC Health Committee (2018) Childhood Obesity: Time for Action (Accessed May 2020)

2. http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/health-and-social-care-committee/childhood-obesity/written/81272.pdf (Accessed May 2020)

3. https://www.globaljustice.org.uk/sites/default/files/files/news_article/a_peoples_food_policy_june_2017.pdf (Accessed May 2020)

4. Welsh local govt association submission to National Assembly for Wales Consultation – rethinking food in wales Sept 2018

5. https://senedd.assembly.wales/documents/s93278/Letter%20from%20the%20Minister%20for%20Environment%20Energy%20and%20Rural%20Affairs.pdf (Accessed November 2020)

6. https://www.gov.uk/government/publications/communique-from-the-inter-ministerial-group-for-environment-food-and-rural-affairs (Accessed October 2020)

7. https://www.gov.uk/government/publications/communique-from-the-inter-ministerial-group-for-environment-food-and-rural-affairs/inter-ministerial-group-for-environment-food-and-rural-affairs-img-efra (Accessed November 2020)

Part 3: Disconnected Perspectives

The previous section looked at how disconnects between actors and activities can undermine a holistic and coherent approach to food policy-making. This section looks at the importance of *ideational* disconnects, which can act as a powerful barrier to coherence.

It became clear during the research that interviewees who worked inside government (as civil servants or other officials) tended to think that food policy was *already* fairly well connected, while interviewees who worked on food policy from outside government (in business, civil society, or academia) tended to think it was not.

A common perspective from interviewees working inside government was that it was not problematic for food to be dealt with by several different departments, and that food issues were being effectively connected across government. One civil service interviewee said, 'stakeholders have this perception that we work in a very siloed way. Whereas inside, when you're part of the civil service, you think this is crazy. Of course, I talk to other departments. We don't do anything in isolation'. Although it was acknowledged that connections didn't always work perfectly (for example it was recognised there was a problem

with 'pockets of knowledge on different parts of food policy in different government departments', by and large the view was that officials know how to 'make the complexity work'. One civil servant described an 'ongoing processes of dialogue' with 'individual departments more or less involved depending on [their] precise degree of interest'. The 'default always [is] that things get agreed by ministers across Whitehall' and it is normal practice for officials to talk across Whitehall to 'work through any wrinkles'. Another 'would be very surprised if anyone is not in regular conversation with their opposite number', saying officials in parallel posts meet 'every month for coffee, whether we've got anything to catch up on or not', in addition to regular departmental meetings. They 'pick up the phone to each other and know who [they] should be putting people in touch with'. Every effort was made, this interviewee said, 'because not joining up becomes a reputational risk'. Another said it was a 'normal' state of affairs to 'end up with six or seven different organisations on one brief'. If there was a question about work going on elsewhere and an official didn't know who the responsible person was, 'it's very easy to find out'. However, it was acknowledged that those personal networks tended to operate between 'clusters' of departments with clearly overlapping mandates; one civil servant noted how they might 'struggle to reach out' to a department outside their cluster.

But for those *outside* government, the food policy-making process – and the resulting policies – were viewed for the most part as not being well connected. As evidence, they mentioned some of the examples of disconnects and tensions discussed in the preceding sections, such as the disconnect between agriculture policy and public health policy goals, or the tension between food production and environmental protection. One interviewee said, 'we genuinely don't think there are examples of the government working together on food issues'. The approach in Westminster was compared negatively to the Devolved Administrations and to city level, where policy-making was seen to be better connected.

However, it was noted that there was also a lack of connection on food policy *outside* government, with, as an interviewee said, 'the whole set of separate issue-group interests not coordinating'. One interviewee acknowledged that 'you can see politicians roll their eyes, literally roll their eyes, if you say joined-up governance'. If civil society groups are advocating more connections, this interviewee argued, 'it's incumbent on [them] to demonstrate what some joining up would actually look like. And maybe do the joining up for them in some ways … [by] making projects that are joined-up ourselves'.

Part of the explanation for these differing perspectives may simply be poor communication between people working on food policy issues inside and outside government: 'from the outside it probably looks less joined up than it actually is', one civil servant said. Another referred to the Health Select Committee enquiry into childhood obesity, where there was significant criticism of the lack of connected working on obesity, 'and yet we are joined up…we meet regularly, we all chat on email, there is a sharing of information and we all know what each other's plans are and ambitions are. And we're working towards a collective outcome. But there is still that wider perception from the outside that government is not joined up on this'. Another civil servant agreed that policy can often look less joined up than it actually is, a misperception which in part may be due to external individuals having tried to engage on an issue but gone to the wrong place, and not having been redirected successfully. The same civil servant pointed to how fragmentation is not necessarily all bad, because it can assure diversity of thought, and allow, for example, consumer interests to be represented independently of producer interests.

However, this is only part of the picture. There is a lack of effective communication on issues which are currently seen by government as requiring links, and where civil servants see themselves as working in a connected way but have not made this clear to stakeholders. But there is also a perception from outside government that connections across

a bigger range of food policy issues are needed to create a coherent and holistic strategy across the food system.

The different perspectives suggest not only a need for increased transparency about who in government is connecting on policy-making, but also a need to bridge policy realities and big ideas about the future of food systems. There is a sense from inside government that external stakeholders with ideas about how food system issues fit together don't understand the realities of policy-making – that they are looking for 'utopia'. Conversely, there is a view from civil society groups, for example, that current efforts to coordinate policy-making are just tinkering around the edges. The implication here is that unless there can be

agreement on *which issues need to be connected*, there is a considerable risk of different groups talking past each-other.

The different perspectives show that policy connections and disconnections are not neutral facts: perceptions of their existence are rooted in the vision for the food system that is being applied, including whether it should prioritise health, environmental, economic or social objectives. The clear implication is that – because it involves ideology and values – the search for policy connectedness and coherence is not an objective process which governments can pursue free of interests, and should not be envisioned as merely a technical exercise in adjusting policies.

Part 4. Conclusions

This report has mapped out a range of connections and disconnects in England's national food policy. The examples in this report should be viewed as a starting point for exploring how future food governance might be better connected. The examples represent the results of a 'bottom-up' survey of how national food policy is working, and where it could be organised more effectively. The many examples of connected working represent a foundation on which to build, and help provide some nuance to the long-standing blanket criticism that there is a failure to join up food policy in England. They also provide examples of how issues can be addressed across government, and by which actors, which might inspire other countries looking to work in a more connected way on food.

At the same time, the list of disconnects – several of which are grounded in tensions between different objectives for the food system, potentially involving hard governance choices – suggest where further exploration into a more holistic policy

approach should be directed. Though the screening was undertaken in the English context, many of the food systems issues it covers are pertinent to other countries. The screening method, and the list of disconnects it resulted in, offers a guide for other countries – and potentially cities – to screen their own policies for how well they connect food systems issues, actors and activities. Building an evidence base encompassing food policy in multiple jurisdictions will help to clarify where connections are most needed, for the benefit of all.

The following considerations are offered to support better connected food policy-making in future:

1. **There should be consensus about which issues require connection.** A set of results from a bottom-up qualitative screening for policy connections is the starting point for further evaluation and debate, rather than an end point. As the OECD recommends, examples should be subjected to a process

of further analysis to establish whether they limit or adversely affects outcomes, and if so, whether this warrants more connection[104].

2. **Fixing connections is not a neutral exercise.** Disconnects cannot always be 'fixed' by simply adjusting policies or existing working patterns. The potential for better connections is informed by views of how the food system should be operating, and what should be prioritised. There needs to be recognition that while some disconnects are logistical, some arise from ideological or political differences, which require open acknowledgement and continuous negotiation.

3. **Increased transparency and better communication are prerequisites.** Report 1 from the Rethinking Food Governance project – *Who makes food policy in England?* – noted that food policy-making is both dispersed and opaque. The streamlining of departmental annual reports and the use of an aggregated government website (gov.uk) makes it difficult to identify cross-government working. Increased transparency and better communication about how food policy issues are being connected inside government could help bridge the conflicting perspectives between internal and external stakeholders identified here. It will also help civil society develop credible proposals for linking policies and reduce the risk of proposals being dismissed as 'utopia' because they are not grounded in a good understanding of policy realities (for example political priorities and organisational arrangements).

4. **Disconnects within departments must also be tackled.** Much attention is given to the need for better connections between government departments, but – as one civil servant expressed – disconnects *within* specific departments can be half of the challenge: how well do, for example, risk managers (policy) and risk assessors (science) talk to one another?

5. **Civil society must be connected too.** Civil society groups and other external stakeholders need to make their own proposals and agendas connected and coherent, to support and champion a holistic approach to food policy. Groups seeking to influence policy should situate their own interests within the wider food system, acknowledge the existence of issues which do not suit their agenda, and demonstrate that they too are working in a connected way by not asking for conflicting changes, or duplicating across organisations.

6. **Interest group involvement must be 'de-siloed'.** Problems of access to food policy-making reported by some civil society groups included being funnelled to particular departments because of traditional ideas about which issues are relevant to which policy areas. This funnelling within 'issue silos' – health interest groups to DHSC, environment to DEFRA – undermines opportunities to cross-fertilise, for example by including environmental issues in health policies. Another example was the separation of farming and environmental stakeholders in meetings during DEFRA's consultation on its post-Brexit farming policy. Creating better connections could therefore be supported by making better provision for cross-fertilising across different policy departments, stakeholder groups and issues.

7. **Policy-making should be more inclusive.** Increased transparency from government is one way to bridge conflicting perceptions. But opportunities are also needed for external stakeholders to flag to government when bigger issues – not currently being connected – could be addressed using a more systemic approach. This could include providing policy-makers with a window on, for example, projects which are connecting food system issues – such as hunger and nutrition, or climate and agriculture - on the ground. But more broadly, it has been

argued that inclusiveness and transparency in policy-making are integral to tackling hard governance choices and value conflicts, and reaching some kind of consensus on the problems and solutions to be addressed.

8. **Governance mechanisms must support connected working.** Part of the reason that food system issues are not as connected as they might be is the way policy-making is currently organised: across at least 16 departments, with no overarching mechanism to bring actors and activities together, or to scan for connections between them. Addressing some disconnections – for example where a single issue requires broader involvement by a number of departments – may be possible within current governance arrangements. But disconnections which involve incoherence between conflicting objectives will likely require some additional mechanisms to bring different actors together, through a process or forum for brokering trade-offs and exploring political prioritisation. Mechanisms which could be used include the ongoing National Food Strategy process; a cross-government body; or an independent body[105].

References

1   Parsons K., Hawkes C. (2019) Brief 5: Policy Coherence in Food Systems. In: Rethinking Food Policy: A Fresh Approach to Policy and Practice. London: Centre for Food Policy.

2   Parsons, K (2020) Who makes food policy in England? A map of government actors and activities. London: Food Research Collaboration. Available at: https://foodresearch.org.uk/publications/who-makes-food-policy-in-england-and-food-policy-coordination-under-covid19/

3   Parsons K., Hawkes C., Wells R. (2019) Brief 2. What is the food system? A Food policy perspective. In: Rethinking Food Policy: A Fresh Approach to Policy and Practice. London: Centre for Food Policy.

4   Parsons K., Hawkes C. (2019) Brief 5: Policy Coherence in Food Systems. In: Rethinking Food Policy: A Fresh Approach to Policy and Practice. London: Centre for Food Policy.

5   Drawing on ideas in Weitz, N., Strambo, C., Kemp-Benedict, E. and Nilsson, M., 2017. Closing the governance gaps in the water-energy-food nexus: Insights from integrative governance. Global Environmental Change, 45, pp.165-173.

6   https://www.city.ac.uk/__data/assets/pdf_file/0018/504621/7643_Brief 5_Policy_coherence_in_food_systems_WEB_SP.pdf (Accessed May 2020)

7   For example Nilsson, M., Zamparutti, T., Petersen, J.E., Nykvist, B., Rudberg, P. and McGuinn, J., 2012. Understanding policy coherence: analytical framework and examples of sector–environment policy interactions in the EU. Environmental Policy and Governance, 22(6), pp.395-423.

8   http://www.oecd.org/gov/pcsd/pcsd-framework.htm (Accessed May 2020)

9   https://www.oecd-ilibrary.org/agriculture-and-food/synergies-and-trade-offs-between-adaptation-mitigation-and-agricultural-productivity_07dcb05c-en

10   https://foodresearch.org.uk/publications/food-policy-coordination-under-covid-19/

11   https://committees.parliament.uk/writtenevidence/4100/html/ (Accessed October 2020)

12   https://www.gov.uk/government/organisations/foreign-commonwealth-office

13   https://www.gov.uk/government/news/government-creates-new-national-institute-for-health-protection

14   Issues tackled under the umbrella of childhood obesity may also be applicable to the wider population.

15   https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734352/defra-ara-2017-2018-web.pdf

16   Parsons, K (2020) Who makes food policy in England? A map of government actors and activities. London: Food Research Collaboration. Available at: https://foodresearch.org.uk/publications/who-makes-food-policy-in-england-and-food-policy-coordination-under-covid19/

17   https://www.gov.uk/government/collections/greening-government-commitments

18   https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/227259/9643-BIS-UK_Agri_Tech_Strategy_Accessible.pdf

19   https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/536388/bis-16-18-agri-tech-industrial-strategy-evaluation-and-baseline.pdf (Accessed December 2019)

20

21   https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/388571/14-1293-animal-plant-health-capability.pdf

22   https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/388571/14-1293-animal-plant-health-capability.pdf (Accessed May 2020)

23   https://bbsrc.ukri.org/news/policy/2016/160113-n-new-vision-for-uk-animal-and-plant-health-research-published/ (Accessed December 2019)

24   https://bbsrc.ukri.org/news/policy/2016/160113-n-new-vision-for-uk-animal-and-plant-health-research-published/ (Accessed December 2019)

25   https://publications.parliament.uk/pa/cm201719/

cmselect/cmhealth/962/962.pdf (Accessed December 2019)

26   Sentiments which were echoed by the subsequent 2016 O'Neill review - https://amr-review.org/sites/default/files/160525_Final%20paper_with%20cover.pdf (accessed October 2020)

27   https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/138331/CMO_Annual_Report_Volume_2_2011.pdf (Accessed December 2019)

28   https://publications.parliament.uk/pa/cm201719/cmselect/cmhealth/962/962.pdf (Accessed December 2019)

29   Veterinary Medicines Directorate (2019). UK One Health Report-Joint report on antibiotic use and antibiotic resistance, 2013–2017. New Haw, Addlestone: Veterinary Medicines Directorate. Available at: https://www.gov.uk/government/publications/uk-one-health-report-antibiotic-use-and-antibiotic-resistance-in-animals-and-humans (Accessed May 2020)

30   ibid

31   Ibid

32   Ibid

33   https://www.nao.org.uk/report/implementing-the-uks-exit-from-the-european-union-the-department-for-environment-food-rural-affairs/ (Accessed December 2019)

34   Ibid

35   Finegood D, Merth T, Rutter H (2010) Implications of the foresight obesity system map for solutions to childhood obesity. Obesity 18:S13–S15

36   Government Response (2019) to HOC Health Committee (2018) Childhood Obesity: Time for Action. Available at: https://www.parliament.uk/business/committees/committees-a-z/commons-select/health-and-social-care-committee/inquiries/parliament-2017/childhood-obesity-inquiry-17-19/ (Accessed May 2020)

37   https://publications.parliament.uk/pa/cm201719/cmselect/cmhealth/882/882.pdf (Accessed December 2019)

38   Government Response (2019) to HOC Health Committee (2018) Childhood Obesity: Time for Action. Available at: https://www.parliament.uk/business/

committees/committees-a-z/commons-select/health-and-social-care-committee/inquiries/parliament-2017/childhood-obesity-inquiry-17-19/ (Accessed December 2019)

39   https://publications.parliament.uk/pa/cm201719/cmselect/cmhealth/882/882.pdf (Accessed December 2019)

40   https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf (Accessed 30.06.20)

41   Government Response (2019) to HOC Health Committee (2018) Childhood Obesity: Time for Action. Available at: https://www.parliament.uk/business/committees/committees-a-z/commons-select/health-and-social-care-committee/inquiries/parliament-2017/childhood-obesity-inquiry-17-19/ (Accessed May 2020)

42   Government Response (2019) to HOC Health Committee (2018) Childhood Obesity: Time for Action. Available at: https://www.parliament.uk/business/committees/committees-a-z/commons-select/health-and-social-care-committee/inquiries/parliament-2017/childhood-obesity-inquiry-17-19/ (Accessed May 2020)

43   E.G. https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/ (Accessed 30.6.20)

44   https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf (Accessed December 2019)

45   ibid

46   https://www.gov.uk/guidance/food-standards-labelling-durability-and-composition (Accessed July 2020)

47   https://www.food.gov.uk/news-alerts/news/were-seeking-your-views-on-allergen-labelling (Accessed December 2019)

48   https://www.parliament.uk/business/committees/committees-a-z/commons-select/environment-food-and-rural-affairs-committee/news-parliament-2017/public-procurement-food-inquiry-launch-19-21/ (Accessed July 2020)

49   https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418072/gbs-food-catering-march2015.pdf (Accessed December 2019)

50   https://assets.publishing.service.gov.uk/
government/uploads/system/uploads/attachment_data/
file/802933/gbsf-nutrition-standards-consultation.pdf
(Accessed December 2019)

51   An evaluation approach where more straightforward
criteria, such as cost, are 'balanced' against more complex
criteria, such as health and wellbeing, resource efficiency and
quality of service

52   https://assets.publishing.service.gov.uk/
government/uploads/system/uploads/attachment_data/
file/419245/balanced-scorecard-annotated-march2015.pdf
(Accessed December 2019)

53   https://www.supplychain.nhs.uk/programmes/
government-buying-standards/ (Accessed December 2019)

54   https://assets.publishing.service.gov.uk/
government/uploads/system/uploads/attachment_data/
file/400695/rural-proofing-imp-review-2015.pdf (accessed
December 2019)

55   https://assets.publishing.service.gov.uk/
government/uploads/system/uploads/attachment_data/
file/600450/rural-proofing-guidance.pdf (Accessed December
2019)

56   https://publications.parliament.uk/pa/cm201719/
cmselect/cmenvfru/870/870.pdf (Accessed May 2020)

57   http://data.parliament.uk/writtenevidence/
committeeevidence.svc/evidencedocument/environment-
food-and-rural-affairs-committee/postbrexit-trade-in-sugar/
written/79064.pdf (Accessed December 2019)

58   https://www.nfuonline.com/news/latest-news/
game-changing-agri-technology-demands-better-broadband/
(Accessed July 2020)

59   https://www.nesta.org.uk/blog/precision-
agriculture-separating-the-wheat-from-the-chaff/ (Accessed
July 2020)

60   https://foodfoundation.org.uk/wp-content/
uploads/2016/09/Food-Foundation-SDG-15_09_2016.pdf
(Accessed December 2019)

61   https://www.theccc.org.uk/wp-content/
uploads/2018/11/Land-use-Reducing-emissions-and-
preparing-for-climate-change-CCC-2018.pdf (Accessed
December 2019)

62

63   https://publications.parliament.uk/pa/cm201719/
cmselect/cmenvaud/1803/1803.pdf (Accessed May 2020)

64   Parsons K, Barling D, Lang T. UK Policymaking
Institutions and their Implications for Integrated Food Policy.
Advances in Food Security and Sustainability. 2018 Nov
12;3:211 p233

65   https://foodresearch.org.uk/square-meal/ (p29)
(Accessed May 2020)

66   https://greenallianceblog.org.uk/2018/09/18/the-
new-agriculture-bill-has-no-vision-for-food/ (Accessed May
2020)

67   https://www.gov.uk/government/publications/the-
eatwell-guide (Accessed December 2019)

68   https://blogs.bmj.com/bmj/2016/03/21/elizabeth-
atherton-and-josephine-head-how-environmentally-
sustainable-are-the-new-dietary-guidelines/ (Accessed
December 2019)

69   Ibid

70   https://publications.parliament.uk/pa/cm201719/
cmselect/cmenvaud/1803/1803.pdf (Accessed May 2020)

71   https://publications.parliament.uk/pa/cm201719/
cmselect/cmenvaud/1803/180302.htm (Accessed May 2020)

72   https://apps.who.int/iris/bitstream/
handle/10665/325201/php-3-4-586-597-eng.pdf (Accessed
May 2020)

73   https://www.fdf.org.uk/responses/FDF-IS-
Response-v180317.pdf (Accessed December 2019)

74   Ibid

75   Where processed beef products were found to be
contaminated with horse meat

76   Parsons K, Barling D, Lang T. UK Policymaking
Institutions and their Implications for Integrated Food Policy.
Advances in Food Security and Sustainability. 2018 Nov
12;3:211 p233

77   https://www.gov.uk/government/publications/
elliott-review-into-the-integrity-and-assurance-of-food-supply-

networks-final-report p. 52 (Accessed December 2019)

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

79   National Audit Office, 2013. Food Safety and Authenticity in the Processed Meat Supply Chain. National Audit Office, London.

80   https://publications.parliament.uk/pa/cm201719/ cmselect/cmenvaud/1491/149105.htm (Accessed July 2020)

81   Ibid

82   https://publications.parliament.uk/pa/cm201719/ cmselect/cmenvaud/1491/149105.htm (Accessed December 2019)

83   Ibid

84   https://www.fdf.org.uk/responses/FDF-IS-Response-v180317.pdf (Accessed December 2019)

85   https://assets.publishing.service.gov.uk/ government/uploads/system/uploads/attachment_data/ file/546588/Childhood_obesity_2016__2__acc.pdf (Accessed December 2019)

86   https://www.cedar.iph.cam.ac.uk/wp-content/ uploads/2019/10/Childhood-Obesity-Plan-Progress-Report-Submission-by-CEDAR-MRC-Epidemiology-Unit-University-of-Cambridge.pdf

87   https://www.fdf.org.uk/responses/DEFRA-Innovation-Consultation.pdf (Accessed December 2019)

88   Ibid

89   More recently expanded to encompass sustainable development in light of the 2030 agenda

90   Parsons K, Hawkes C. Brief 5: Policy Coherence in Food Systems. In: Rethinking Food Policy: A Fresh Approach to Policy and Practice. London: Centre for Food Policy; 2019. Available at: https://www.city.ac.uk/__data/assets/pdf_ file/0018/504621/7643_Brief-5_Policy_coherence_in_food_ systems_WEB_SP.pdf

91   https://www.oecd.org/dac/peer-reviews/UK%20 peer%20review%202014.pdf (Accessed December 2019)

92   https://www.ukssd.co.uk/measuringup

93   Sustain (2020): A Green and Pressured land, available at: https://www.sustainweb.org/publications/a_ green_and_pressured_land/

94   https://assets.publishing.service.gov.uk/ government/uploads/system/uploads/attachment_data/ file/288845/10-634-land-use-futures-summary.pdf (Accessed December 2019)

95   https://foodfoundation.org.uk/wp-content/ uploads/2018/09/Affordability-of-the-Eatwell-Guide_Final_ Web-Version.pdf (Accessed December 2019)

96   Ibid

97   https://publications.parliament.uk/pa/cm201719/ cmselect/cmenvaud/1491/1491.pdf (Accessed December 2019)

98   Ibid

99   https://www.hrw.org/report/2019/05/20/nothing-left-cupboards/austerity-welfare-cuts-and-right-food-uk#

100   The research for this report was completed before the controversy over food standards and trade deals re-ignited during the passage of the Agriculture Bill in 2020.

101   https://digitallibrary.un.org/record/1648984?ln=en

102   https://www.gov.uk/government/news/trade-and-agriculture-commission-membership-announced

103   https://www.sustainweb.org/news/oct20-future-british-standards-coalition-interim-report/ (Accessed October 2020)

104   Parsons K., Hawkes C. (2019) Brief 5: Policy Coherence in Food Systems. In: Rethinking Food Policy: A Fresh Approach to Policy and Practice. London: Centre for Food Policy.

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.

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