Rethinking Food Governance 3

12 tools for connecting food policy

A typology of mechanisms

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Introduction

This report looks at how food policy-making in England – and in other countries – could be better connected, in ways that would lead to more coherent and effective policy. It is the third report in the Food Research Collaboration's Rethinking Food Governance series.

With food 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'[1], governments around the world are under pressure to approach food systems in a more holistic and coherent way. This is because policies targeting different parts of the food system are often made in isolation, with little attention paid to how a policy made in one part of the system has impacts elsewhere. Recognition of how food issues are connected has led to many calls, over the years, for a more connected or 'integrated' policy framework (Box 1)[2].

The Rethinking Food Governance project is a response to such calls for more connected food policy. The first report, *Who makes food policy in England?*[3], presented an overview of the actors and activities involved in food policy-making in England. It identified that governance arrangements currently fragment responsibilities for food policy across at least 16 departments and public bodies. The second report, *How connected is national food policy in England?*, highlighted examples of where food systems issues are being connected in policy-making, and where there are perceived disconnects.

This final report in the series moves from specific examples to look at the organisational arrangements, governance structures and practices in place for connecting food policy currently, and what measures could be taken to support a more connected approach. It focuses on governance issues around connecting policy, while acknowledging that other aspects of food governance have also been recommended for improvement (for example: improving the application of and transparency about evidence-use, and the participation of stakeholders in policymaking[4]).

Box 1: Calls for better-connected food policy in England

1918: Economist Walton H Hamilton advocated for a 'national food policy' in wartime given the 'baffling choices between conflicting interests'[5].

1930s: Professor and UK government advisor Sir John Boyd Orr campaigned for a 'food policy' to coordinate agricultural and nutritional policies, in the wake of both the first world war and scientific discoveries in nutrition. The Committee on the Medical Aspects of Food Policy was established in the UK and the President of the Royal Society asked, 'Is the time yet ripe for the initiation of a comprehensive National Food Policy; one that will endeavour to adjust production, in a qualitative as well as a quantitative sense, to right consumption, and at the same time organise all the details of distribution on national lines?'[6].

1935: The journal *Nature* published an article about the need for a national food policy, in light of 'the interdependence of problems of public health, agriculture and economics'[7].

1999: A paper by food policy professor Tim Lang noted: *'the challenge of how to balance seemingly contrary policy initiatives - health, environment, consumer aspirations, commerce … is formidable. To accord priority to the protection of the environment, health, consumers and social justice will require considerable adjustment in policy and food practices'*[8].

2008: A food strategy by the UK Government's Cabinet Office stated that *'a patchwork of strategies addresses different aspects of the food system and the market failures in each discrete area'*[9].

2011: The Foresight Future of Food & Farming report concluded that interconnected policy-making was of critical importance, noting *'other studies have stated that policy in all areas of the food system should consider the implications for volatility, sustainability, climate change and hunger. Here it is argued that policy in other sectors outside the food system also needs to be developed in much closer conjunction with that for food. These areas include energy, water supply, land use, the sea, ecosystem services and biodiversity. Achieving much closer coordination with all of these wider areas is a major challenge for policymakers'*[10].

2013: A review of food policy by consumer organisation Which? described *'food issues'* as '*currently dealt with in a fragmented way with no clear sense of overall direction and priorities. But the issues that are facing the food supply chain require much stronger Government leadership. Some food policies and strategies do exist, but only in some parts of the UK and only addressing part of the picture. There is no food policy for England. There are also no formal co-ordination mechanisms in place to ensure that a consistent approach is adopted across different government departments and agencies*'[11].

2017: The vision of the People's Food Policy for the UK was published, including a recommendation for a '*cross-departmental and integrated strategy able to address the complex and interconnected nature of our food system'*[12].

2019: The UK Government announced the development of a National Food Strategy, *'intended to be an overarching strategy for government',* to address multiple challenges around food[13].

2021: The Independent Review for the National Food Strategy described how *'a lack of joined-up thinking between government departments has led to particular incoherence in the areas of trade and health policy'*, and public dialogues run as part of the Strategy's development found support for *'a joined up system of governance, so national government can take strategic oversight over the food system',* with participants calling for high-level coordination, and more *'formal arrangements' f*or bringing government departments together to plan strategically for food issues on, for example environment, health and social support measures. Some participants suggested this take the form of an independent body or even a 'National Food Strategy board or department'[14].

Developing a typology of organisational arrangements to connect policy

As detailed in Rethinking Food Governance Report 1, responsibilities for food-related policies are fragmented across many government departments. This arrangement is not peculiar to food; indeed it is the most common organising arrangement for governments around the world. Departments of state are organised around separate issues or functions, to allow functional specialisation and efficiency, and facilitate accountability[15]. However, such arrangements are perceived to be challenging for issues which cut across a number of departments – often labelled as 'wicked problems'. When issues are relevant to multiple departments, new institutional arrangements may be created to coordinate the relevant organisations, or to provide a neutral 'safe space' beyond inter-departmental rivalries around policy issues which are proving difficult to make progress on[16]. Such arrangements have been a focus in the policy sciences for several decades, sometimes described as 'centralised instruments'[17], or 'procedural policy tools'[18]. This report adopts the terminology of 'mechanisms', as a broad descriptor which encompasses the informal ways (such as personal contacts) as well as purposefully-introduced formal methods (such as the creation of new bodies or ministries) in which connections can be made.

At present, although policy connection is widely advocated in major food systems reports, there is little guidance on how, in practice, food governance might be redesigned to support more connected policy. Discussion tends to remain at a general level. For example, one of the Organisation for Economic Cooperation and Development's (OECD) recommended 'Eight Building Blocks' for policy coherence is the creation of 'coordination mechanisms' – but often such coordination mechanisms are described in a broad way, and it is not clear how they might work in the context of food policy. There is also little empirical research available on what food governance mechanisms are utilised in different countries, though there are exceptions, including a 2020 report created to inform England's National Food Strategy, which details some of the governance arrangements behind policies in different countries[19], and a mapping of policy levers for food systems transformation which looked at governance levers currently in use[20].

This report fills a gap by drawing on evidence including:

- A desk review of policy connection mechanisms[21];
- An empirical mapping of England's current national-level public food governance arrangements (presented in Report 1);
- Data from 23 qualitative interviews with senior stakeholders from the civil service, civil society, the food industry and academia.

Using this data, a typology of possible mechanisms to connect food policy-making was devised, which is based on:

- A case study of food policymaking mechanisms currently, or previously utilised in England;
- Examples of food governance mechanisms in other countries, including Scotland and Australia, which were identified during the review;
- Mechanisms in non-food policy areas which could be used in food;
- Proposals for new mechanisms from stakeholders (which are as yet untested in England or elsewhere, but are consistently part of the conversation on 'how to do' food governance differently, in England and beyond).

The typology of mechanisms is organised into a scale from 'softer' or more informal mechanisms, to 'harder' or more formalised mechanisms, drawing on existing non-food typologies from the policy sciences literature[22]. At the 'business as usual' end of this scale are the ways that day-to-day policy-making can be, and is, connected on a *communicative* basis, through mechanisms such as 'clearance' and personal networks. Then comes a range of organisational tools which go a step further to embed *cross-cutting working within the current structures of government*, such as taskforces and advisory groups. Food Strategies and Plans also tend to fit this category. Further along the scale are more substantial mechanisms which *alter the structures or processes of government*, such as by introducing legislative requirements, or by means of procedural mechanisms like budgeting, or by changing ministerial portfolios or re-designing the responsibilities of ministries themselves[23]. The mechanisms are summarised in Table 1 and presented in Figure 1. The remainder of the report discusses the mechanisms in more detail.

It should be said that these categories, though grounded in the research findings, are not watertight: there is some overlap between functions. Labels, in particular (such as taskforce, unit, strategy), can be applied to different sorts of entities on different occasions, or used interchangeably.

Another caveat is that many of the mechanisms which have been in place previously, or which are being used in other countries, have not been evaluated for their effectiveness, or even written up in any detail. The typology presented is therefore based on the best available evidence at the time the research was conducted (2019). Where available, data from interviews helps to provide some evaluative perspectives from those with experience working in food policy-making in England. At the same time, it is important to note that while several civil service interviewees in England expressed the view that their work on food suffered from the lack of a 'focal point', strategy, or something or somebody to be accountable to, there was no clear view of what the appropriate mechanisms should be. They might include 'having some clearer ministerial leadership, or a standing committee or a sub-committee', as one interviewee said, adding 'there's lots of us who are keen to try and be more joined up'.

Further research is required to describe, understand and analyse how different types of mechanisms work in practice.

Table 1: Summary of mechanisms for connecting food policy

(Examples from national-level government in England unless otherwise stated)

Mechanism	Details	Examples
1. Day-to-day Connections	Connections between food policy activities made by individual civil servants in the course of day-to-day policy-making.	- Cross-government clearance: coordinating policy by notifying departments – via written correspondence – of any major new policy decisions. - Personal connections: refers to the interactions that take place between individual officials. - 'Central Government': responsible for making joint working between departments happen where it is needed.
2. Issue-Specific Projects and Supporting Groups	Mechanisms for coordinating different departments' input on a specific policy issue. Issue-specific projects are likely to be supported by a dedicated group/taskforce/ committee.	- Childhood Obesity Plan (supported by the Childhood Obesity Plan Delivery Group) (current)

3. Cross-government Food-themed Groups	Committees, taskforces or groups – with civil service or ministerial membership across multiple departments – created to coordinate activities on food policy (not just single issues) across government.	- Food and Other Essential Supplies for the Vulnerable Ministerial Task Force (2020-2021) - Food Policy Task Force (2010) (UK) - Government Cabinet Sub-Committee on Food (2010) (UK)
4. Multistakeholder Advisory Groups	Groups created to coordinate input from private-sector and / or civil society stakeholders, with officials from one or more departments, focused on food.	- Food Resilience Industry Forum (2020) - Food and Drink Sector Council (current) - Council of Food Policy Advisors (2008-10) - Food strand of UK Sustainable Development Commission (2000-2011)
5. Overarching Food Policy Projects/Strategies	Mechanisms which bring all (or several) aspects of policy related to food together in overarching cross-government or whole-of-government projects.	- National Food Strategy (current) - Food Matters/Food 2030 (2007-2010)
6. Food System Mapping, Monitoring and Reporting	Government-led initiatives to map and monitor the food system to provide baseline data to inform policy development and implementation.	- Australian National Food Plan (2013) 'State of the Food System' report - Food Matters: An Analysis of the Issues (2007) - Scottish Good Food Nation Bill proposals for reporting on food policy (current) - Independent Review for National Food Strategy proposals for reporting (2021)
7. Dedicated Units/ Agencies Within Government	Dedicated units of officials within government, focusing on food policy.	- DEFRA Food Policy Unit (2009-2016)
8. Parliamentary Committees	Collaborations between several parliamentary bodies which address aspects of the food system.	- Joint select committee on air quality - All Party Parliamentary Groups (APPGs) e.g. APPG on Cancer (UK)
9. Dedicated Food Policy Bodies	Bodies (or a single body) to coordinate work on food, which may be located internally or at arms-length/independent from government. May be used to connect inside and outside government stakeholders working on food system issues.	- Scottish Food Commission (independent) - Various proposals for a national food policy body or watchdog
10. Legislative Approaches	Mechanisms to enshrine food policy goals and implementation in law.	- Being explored in Scotland with Good Food Nation Bill - Right to Food legislation (India) - Independent Review for National Food Strategy proposal for Good Food Bill (2021)
11. Procedural Mechanisms	Sets of procedural instruments, such as shared budgets or indicators, which incentivise joint working.	- No food-specific examples identified
12. Machinery of Government Changes	Redesign of ministerial portfolios or re-allocation of departmental responsibilities, to connect issues within a particular role or organisation. May include creation of 'Super Ministries' which combine multiple policy sectors under one departmental roof.	- DEFRA as a 'super ministry' covering agriculture and environment (created 2001) - Creation of DEFRA 'Minister of Food'

Figure 1: Mechanisms for connecting food systems policies

Parsons, K. (2022) 12 tools for connecting food policy: A typology of mechanisms. Rethinking Food Governance Report 3. Food Research Collaboration.

The Mechanisms

This section provides a more detailed description of each mechanism, along with insights and perspectives from interviewees on the mechanism's current or potential effectiveness.

1 Day-to-day Connections

There are several ways that connections between food policy activities are made by individual civil servants in the course of day-to-day policy-making. These mechanisms have potential to improve communication between individual departments, and help to identify where different activities are related.

Clearance

Cross-government 'clearance' is a mechanism for coordinating policy by notifying departments – by written correspondence – of any major new policy decisions[24].

Several civil service interviewees described a process known as 'clearance', otherwise known as the 'write-round' collective agreement process[25], as an important mechanism for connecting work across government. Clearance is always needed for measures significantly affecting more than one department and/or the Devolved Administrations, and new or controversial policies/announcements or White Papers; and sometimes needed for the launch of consultations, responses to consultations, Select Committee or other reports or reviews, and for departmental strategy documents. It is not required for speeches/interviews/documents highlighting existing policy[26].

When clearance is requested, departments are given six to nine days to respond – either with a 'nil return' if there is nothing to amend, or 'the Cabinet secretariat will work with Departments to resolve any differences that emerge'[27]. Because significant policies need to pass cross-government clearance, an interviewee explained, 'it's impossible to do something without working with other departments'.

But there appear to be limits to how much the clearance process can facilitate a joined-up approach. The guidance states that 'letters requesting clearance should never be the first time other departments are aware of policies' and 'it is important to work at official level to agree policies wherever possible'[28]. An interviewee commented that 'it's quite late in the process, and not everybody is involved'. Interviewees also mentioned problems over who was included on the write-around: 'you have to try and make sure you get on the circulation [list]'. The fact that the write-round relied on the right people seeing the right information and understanding its relevance was said to make the process ad hoc and unreliable as a coordination mechanism. One interviewee commented that it mainly involved 'looking for things that [their department] might find offensive or difficult, rather than saying, actually that's not good enough, we should or should not do this'.

Personal Connections

'Personal connections' refers to the interactions that take place between individual officials. Though informal, they can constitute an important mechanism for cross-government working.

Personal connections are rarely delineated as an explicit mechanism in the literature, but the importance of joining up via personal connections came through from several civil service interviewees. For example, one remarked

that cross-departmental working should not 'be dependent on someone, on personality, but it can be an important part':

> *'You can have all the processes you like but if you can't work together and don't respect one another, forget it … often it's more to do with who you're dealing with and how you can build those relationships and what access they have to ministers'.*

Another interviewee went further, arguing that 'a good civil servant makes the connection. They are failing if they're not'. Forging personal connections was part of their 'role description' and could be more effective than 'committees for the sake of committees'. But the danger with relying on personal connections was raised by a civil society interviewee who noted that, in their experience, the officials involved could 'move on, or they don't have traction', and coordination could lapse.

One civil servant pointed to the use of the government intranet, 'The Knowledge', which could help link officials together. The intranet includes pages civil servants can visit if they need to find something out:

> *'You upload all of the essential information that somebody might need to know around a particular policy … you can do a quick search and it would pull up briefings, correspondence, Parliamentary questions we've done around it'.*

But another civil service interviewee acknowledged that 'a lot of it does rely on … having to talk to the right people'. Another said, 'a more formalised structure to link us up' would be helpful, to make the connections more widespread.

'Central Government'

'Central Government', primarily Cabinet Office (CO) and HM Treasury (HMT), is responsible for making joint working between departments happen where it is needed.

Central Government 'has responsibility for coordinating and overseeing the work of government, enabling it to achieve its strategic aims and ensuring there is a central view of the effective operation of government as a whole'[29]. Known as 'the corporate centre' for government, the CO is led by the Cabinet Secretary, whom the National Audit Office (NAO) describes as the Prime Minister's most senior policy advisor, and has historically encompassed the most senior positions in the civil service[30],

The CO has an important role in cross-government work, being responsible for 'leading on cross-government initiatives, providing strategic oversight of government as a whole and understanding the cross-government picture and, where appropriate, making the best decisions for government as a whole and incentivising the right behaviour, including promoting collaboration, integration and innovation'[31]. However, the department has been criticised by the NAO for needing to 'lead better integration across government '[32].

The CO played an important part in a piece of cross-cutting policy work on food – the analysis report and strategy produced in 2008-10, which was run centrally from a 'Strategy Unit' within the CO. The CO's involvement is perceived by those who were involved at the time to have enabled effective cross-government working because it was a neutral but high-status convener of the different departments involved[33]. Similarly, the importance of support from the centre of government was raised by interviewees in relation to the Childhood Obesity Plan (COP). The presence of a senior advisor 'from a health background' who had said, 'this is really important, let's just do it', and a Cabinet Secretary who saw obesity 'as a big issue for government', were both seen by interviewees as important facilitators of this cross-government project. The Economic and Domestic Affairs secretariat was also mentioned as influential in terms of aiding cross-government work on the COP. It was described by a civil service interviewee as the 'bit of machinery in government that bangs heads together'. The Economic and Domestic Affairs secretariat is one of four teams within the Cabinet Office secretariat that support the Prime Minister[34].

2 Issue-Specific Projects and Supporting Groups

Mechanisms for coordinating different departments' input on a specific policy issue. Issue-specific projects are likely to be supported by a dedicated group/taskforce/committee.

Beyond day-to-day connections, the most common mechanisms for cross-government working on food are projects set up to facilitate interdepartmental collaboration on specific policies or issues. These may be referred to as policy- or programme-based groups, taskforces, boards or committees. They are used to ensure particular policy issues are connected to some, or all, of the actors and levers needed to achieve policy outcomes, which may be spread across several departments.

One interviewee described how the government, 'especially in the food policy world' is good at identifying areas where there is potential to link a number of government stakeholders and recognising that 'so and so needs to be in on this'. Details of the membership of these specific-issue working groups are not publicly available. An interviewee described how each group would have its own terms of reference, but these would not usually be published.

Examples mentioned by interviewees included the delivery board for the Childhood Obesity Plan, which was said to involve senior officials who were reported to meet to discuss progress every three months, a working group of officials who met monthly, and sub-groups for the sugar-reduction and calorie-reduction programmes. (The Childhood Obesity Plan is often cited as a prime example of connected food policy-making, but was also said by interviewees to show signs of disconnection, as discussed in Rethinking Governance Publication 2). Other examples included the DEFRA-led Food Procurement Taskforce on Government Buying Standards, and the Agri-tech Council, later re-named the Agri-food Tech Leadership Council, on innovation and technology. Another is the DEFRA Systems Research Programme (DSRP), a mechanism which was created to facilitate connections across five of DEFRA's policy areas via six senior academic research fellows: Rural Land Use, Food, Air Quality, Marine, and Resources and Waste, with a view to ensuring 'the connections between environmental issues are properly considered'[35].

3 Cross-government Food-themed Groups

Committees, taskforces or groups – with civil service or ministerial membership across multiple departments – created to coordinate activities on food policy (not just single issues) across government.

Groups – which may be termed 'committees' or 'taskforces' – bringing together civil servants or ministers from various departments can be used to coordinate food policy activities across government. While no permanent mechanism of this kind could be identified, several (temporary) groups were created in response to the Covid-19 pandemic (including a Food and Other Essential Supplies for the Vulnerable Ministerial Task Force), though these focused predominantly on food supply rather than food issues across the board (for example food and public health[36]). Prior to this, a number of mechanisms (see below) were established during the national food policy projects of 2007-2010: Food Matters (2007) and Food 2030 (2010). However, only piecemeal information can be found on how these bodies operated, and there is no way to gauge what impact they had in practice. All were seemingly disbanded at the time the government changed (from Labour to the Conservative-Liberal-Democrat coalition) in 2010.

Policy integration was a specific objective behind the establishment in 2008 of a cross-government Food Strategy Task Force (FSTF): the then Prime

Minister asked the Cabinet Office to create the group 'to ensure that different parts of government work effectively together' to address food system challenges[37]. The FSTF was intended to have clout in government – it was to be chaired and supported by the Cabinet Office, and would involve 'senior officials' from several other departments. Its remit clearly promoted connected policy-making; it was to:

- Oversee and coordinate work on food issues across government;
- Drive forward delivery of the measures announced in the Food Matters report;
- Join up food policy through improved coordination and communication of relevant activities in different government departments; and
- Ensure that common positions were reached on issues relevant to supporting the delivery of low-impact, healthy, safe food and that those positions were properly disseminated[38].

The work of the FSTF was to be transparent, and updates on its work and impact would be published on an annual basis[39].

At the same time, a Cabinet Sub-Committee on Food (DAF – 'Domestic Affairs: Food') was established to provide secretaries and ministers of state from all the departments a 'dedicated opportunity to discuss and take decisions on food policy across the piece'[40]. No details of membership, meetings or attendance could be identified for this sub-committee. In a 2009 House of Commons debate an MP made reference to this lack of information, commenting:

> *'...apart from the Council of Food Policy Advisers, nobody has a clue what the rest of these good people have been doing. Nobody knows how many times the ministerial Sub-Committee on Food has met, let alone what it has been discussing*[41]

Similarly, in its 2009 *Securing Food Supplies up to 2050* report, the Environment, Food and Rural Affairs (EFRA) parliamentary Select Committee cautiously welcomed the new groups working on food policy, but argued 'the Task Force and the Sub-Committee must be used as a way of facilitating action, rather than a substitute for it', calling for 'as much information as possible about the groups' decisions and the work resulting from it' to be published on the internet[42].

More recently, academics have called for a reinstatement of such a mechanism for food policy, arguing that any new UK statutory framework post-Brexit:

> *'... will need cross-departmental and devolved authority support and commitment and not just be associated with DEFRA or any other single department. It should include the creation of a Standing Committee or Commission on Food and Agricultural Policy, consisting of MPs, Officials, and an inclusive representation from the civic, community, business and public service and devolved sectors. This body will need to agree action plans and to set sectoral targets and performance measures, as well as to hold ministers to account. These national targets will be aligned to the internationally agreed targets of the SDGs, COP 21 and higher performing nutritional and environmental targets. They will cut across and stimulate policy integration between a new and revised agricultural policy (following Brexit), energy, health, education and training, economic development, community regeneration, and creative green and circular procurement policies'*[43].

The Scottish government has established a ministerial working group on food, to help ensure joined-up working across government, with the aim of ensuring 'a coherent policy approach is taken on all aspects of food policy, including in achieving the Scottish Dietary Goals'[44]. It is said to involve engagement with a good number of

senior Ministers[45], though it is not clear how often it meets, or what its activities involve.

However, interviewees had mixed views about the usefulness of these sorts of groups. Several were keen to see a broader mechanism than the existing issue-specific groups. For example one suggested the creation of 'an easier, more formalised structure to link us up', broader in scope than groups like the Agri-Tech Leadership Council, which 'was pretty effective' but narrowly focused. Another interviewee's experience of programme-based groups led them to recommend that attendance should not be voluntary: 'they can't just dip in and out as they feel'. The interviewee added that 'it all comes down to leadership. Without some kind of food unit or food ministry, it just won't happen'.

There was also some scepticism about the creation of such a mechanism, full stop: one interviewee had 'seen lots of task forces come and go' and another hated 'committees for the sake of committees' and worried that 'in order to look better from outside we end up with a bureaucracy instead of getting on with the job … I'm not into what looks good. I'm into how we make a difference'. Another felt it would be 'unworkable', mainly because the membership would have to be unmanageably wide: 'with the best of intentions, it can get a bit complicated. It sounds good in principle, but the logistics of actually doing that get in the way'.

4 Multistakeholder Advisory Groups

Groups created to coordinate input from private-sector and / or civil society stakeholders, with officials from one or more departments, focused on food

There are many different advisory groups which provide a connecting mechanism between policy-makers and food system stakeholders – from the private sector, third sector or scientific expertise. Most departments have their own advisory boards or committees (many of which are listed in Rethinking Food Governance Report 1). Several advisory groups, consisting mainly of food industry representatives, were either created or utilised as part of the policy response to ensuring food supplies during the Covid-19 pandemic. These included a Food Industry Resilience Forum, a Food Vulnerability Stakeholder Group, a Food Chain Emergency Liaison Group, and the 'F4' group of food trade associations. These groups enable food companies, or their representative bodies, and sometimes civil society groups, to provide information and support policy delivery, to one or more government departments. Some groups met on a daily basis during the first months of the pandemic[46].

The most significant national-level food policy mechanism of this kind in England which was mentioned by interviewees was the Food and Drink Sector Council (FDSC). The FDSC was established in 2017 to act as a coordinating body for the entire farm-to-fork food chain, covering farming, manufacturing, retail, hospitality and logistics. It thus explicitly recognises the benefit of joined-up working – in this case not just across government but between government and industry. The Terms of Reference state that the 'partnership' will support various strands of government policy for food, including resilience, the supply of affordable products, improved nutrition and diet, reductions in emissions and waste, the development of a skilled workforce, and export growth[47]. The key objective is to 'to improve the productivity and sustainability of the industry'[48]. The Council is jointly chaired by industry and government, with the secretariat split between the DEFRA Industrial Strategy team and the food and drink industry[49] with representatives from government departments (DHSC, BEIS, DEFRA, DIT), the food industry and the sectoral association the British Nutrition Foundation.

Interviewees had mixed views on the FDSC's potential for connecting food policy. One noted that it was the most ambitious mechanism of its type to date, because although there have been similar councils in the past, 'there's never been

one that went right the way across the food chain'. Others, both inside and outside government, were concerned about whether the remit and membership of the group was broad enough to provide a mechanism for joining up all work and considerations around food. Questions were raised about the prominent role given to food industry executives, and how this might affect public health objectives. One interviewee commented that despite aspirations, the FDSC's membership was in reality 'a narrow group of people'.

An example of a broader multistakeholder advisory mechanism which previously operated in England is the Council of Food Policy Advisors (CFPA). The CFPA was established in 2008 to 'provide independent advice on a wide range of food policy issues'[50]. It was chaired by Dame Suzi Leather and supported by 15 members, with priorities to include: Sustainability metrics for a low-impact, healthy diet; Public sector food procurement; Increasing consumption of fruit and vegetables; and Sustainable meat and dairy consumption[51]. The activities of the CFPA were more transparent than those of the mechanisms discussed above, with minutes of meetings and reports available online. Select Committee oral evidence on DEFRA's Food 2030 strategy highlighted some of the group's work, including initiating the Fruit and Vegetable Task Force, and refining the Healthier Food Mark for public procurement[52].

However, civil servants interviewed about the CFPA in an earlier research project questioned its efficacy – due to its advisory nature, and the wide scope it attempted to cover. Their comments reveal important lessons for the design of any future mechanism of this type. They argued, for example, that it was only advisory and therefore toothless, didn't have a clear mandate, and 'tried to boil the ocean', meaning ministers lost interest because the group couldn't narrow its scope to recommendations which were actionable by government[53].

5 Overarching Food Policy Projects/Strategies

Mechanisms which bring all (or several) aspects of policy related to food together in overarching cross-government or whole-of-government projects

One key mechanism for connecting food policy is the creation of an overarching plan or strategy to bring all (or several) aspects of policy related to food together in a cross-government or whole-of-government project[54]. Such strategies include multiple policy objectives and activities across the economic, social and environmental dimensions of the food system. In theory, therefore, these instruments have the potential to improve food policy coordination and coherence by bringing together a government's many activities and goals around food, and addressing how these interact. However, although the idea of joining-up food policy has been raised for several decades, 'there are few good examples of a coordinated approach to food at the national level, and indeed few cross-cutting national food policies in place'[55].

Several countries – including Canada, Finland and Sweden – have published a 'national food policy', though little is known about their development or implementation[56]. Other countries, including the UK (see below) and Australia, have developed national food policies which failed to be implemented (due to changes in government)[57].

Plans to create a new National Food Strategy for England were announced in 2019. The then Environment Secretary, Michael Gove, appointed DEFRA non-executive director (and founder of the Leon restaurant chain) Henry Dimbleby 'to conduct [a] year-long review', and to then set out recommendations within six months of its completion. This would be followed by the government publishing 'an ambitious, multi-disciplinary National Food Strategy, the first of its kind for 75 years, in the form of a White Paper'[58]. Building on work underway in the post-Brexit

Agriculture Act, Environment Act and Fisheries Act, as well as the Industrial Strategy and the Childhood Obesity Plan, the government's stated ambition is to create 'an overarching strategy' for food[59]. *The Independent Review for the National Food Strategy* was published in July 2021 (See Box 2).

Interviewed before the plan to create a National Food Strategy for England was announced, interviewees inside government expressed some support for this type of mechanism. One commented that people might be surprised there wasn't already a food strategy, but pointed out that the fact there is currently no overarching strategy does not mean there are no connected policies: 'I think there is a system that works'. Others felt that a policy that brought all food-related work together in one place would help make clear 'what the top goals are', especially after Brexit, amid uncertainty over what path the UK would take, for example over food standards. But there was also scepticism from civil service interviewees about both the need for and the feasibility of a national food policy. They anticipated problems because of the scale and scope of the strategy, which would be 'huge and possibly quite messy', given the need to bring together farming, manufacturing, skills, health and safety, and international trade: 'It just would be so huge it would not be useful,' concluded one. Another felt that success would depend on the level of senior support it was given by government, but even though a unified strategy was 'a great idea', it would be 'unpractical because [it would be] so enormous'. Another view was that bringing so many issues together risked losing focus – and that the Childhood Obesity Plan, with its cross-cutting elements, in fact does the job of a food strategy. Others agreed that a new policy was either unnecessary or unworkable. One felt there was already a national food policy – 'nutritional standards.' Another felt that until they 'actually see it' they found it 'difficult to imagine happening in real life'.

This scepticism inside government contrasted with a marked enthusiasm for a national food policy from several stakeholders from industry and civil society. 'How many ticks can I have?' said one interviewee:

> *'If it's farm to fork, if it's 25-year in its outlook, if it includes out-of-home as much as retail, because that's where the hidden weaknesses are in the system, and if it has education at its heart, then it's just a no-brainer, it's something we should and could have done years ago'.*

Another argued for the importance of an overarching food policy 'dipping into the expertise in each department' to ensure that 'almost any policy related to food' would be obliged 'to look at the other areas it affects … You can't have a farming bill and not at least have a look at the current legislation on climate change [or] understand the need to link it to nutrition'. This idea was echoed by the interviewee who felt tensions between the desire to protect high standards on one hand and pressure for low prices on the other should be managed 'by forcing people to come forward with a coherent policy', though they also worried 'the minute people hear about a food strategy, it's like a bucket in the far distant future into which you can pour everything you don't want to deal with now'.

While the National Food Strategy currently being developed is badged as the first of its kind for 75 years, this is not accurate. In the late 2000s, a cross-cutting food policy was developed, as outlined in the *Food Matters* (2008) and subsequent *Food 2030* (2010) policy reports[60]. These projects were a response to the fact that the UK had not had 'a comprehensive and formal statement of "food policy" since the Second World War'[61]. In the Cabinet Office's analysis, by 2008, 'a patchwork of strategies [addressed] different aspects of the food system'[62]. The *Food Matters* report was presented as 'an overarching statement of government food policy', which aimed 'to review the main trends in food production and consumption in the UK; to analyse the implications of those trends for the economy, society and the environment; to assess the robustness of the current policy framework for food; and to determine what the objectives of future food strategy should be and the measures needed to achieve them'[63]. It was followed two years later by the strategy report Food 2030, where the problem of ensuring food

security was added to the challenges of integration, climate change and obesity highlighted in *Food Matters*[64].

An interviewee who was involved in these earlier projects expressed surprise that 'it's taken this long for us to be talking about it again' and describes them as 'a massive missed opportunity' for food policy. There had been genuine effort to involve a wide range of partners, and it was regrettable 'politics took over' when the government changed following a General Election – an example, the interviewee said, of a new administration cutting off its nose to spite its face. These projects led to the creation of a number of significant mechanisms for coordinating food policy across government[65] – as outlined in this typology. These included a Food Strategy Task Force, the first Cabinet Sub-Committee on Food since WW2, a joint research group for food; later, a Council of Food Policy Advisors and Food Policy Unit were also set up in DEFRA[66].

Box 2: England's National Food Strategy

The Independent Review for the National Food Strategy – an independent review of food commissioned by the Westminster government – contains a range of recommendations[67], including for new policy measures such as the salt and sugar reformulation tax, and mandatory reporting for food companies; updated versions of existing measures which are not working as effectively as they might, for example food public procurement and dietary guidelines; and new governance arrangements for food[68]. The new governance arrangements include more robust monitoring of the food system and related policy activities, to enable government to be held to account for progress, and an expanded remit for (non-ministerial) government department the Food Standards Agency to cover healthy and sustainable food advice and measures. The Independent Review was intended to inform a future food strategy for England[69].

Government-led initiatives to map and monitor the food system to provide baseline data to inform policy development and implementation

Several countries – as part of the process of developing a national food policy – have undertaken or proposed a mapping exercise to provide baseline information on the food system that the policy aims to address. These reports bring together evidence – including statistics – from different parts of government[70], to create a picture of the 'state of the food system', and by providing data on different aspects of the food system can support coordinated policy-making. An example from the UK is the report *Food: an analysis of the issues* (2007), which fed into the Food Matters national food policy project. The report examined 'trends shaping food consumption and production in the UK and their implications for society, the economy and the environment'[71]. Similarly, a commitment of the 2013 Australian National Food Plan (which was never implemented) was to publish a 'State of the Food System' report 'every five years to bring together key information about the food system and how it is performing'. The rationale was that 'bringing this information together into a single report is an important step in strengthening the knowledge base on which decisions about our food system are made' and 'will help foster community understanding of, and support for, our food system; and it will provide greater opportunities for the community to obtain information about the food system'[72].

Dedicated food system maps of this kind are not common, but some mapping is often done as part of food policy development and elements can

be found within the reports published at the end of such projects. With increasing attention being drawn to the need for a food systems approach, such baseline maps are likely to become an important mechanism for more effective policy-making.

Similarly, there is rarely any mapping of the diverse range of food system policy activities taking place in a particular country. As outlined in the introduction to this report, and in Report 1 on who makes food policy, a 'map' like this is an essential first step in understanding how food policy is shaped and conducted by governments and how it can become better connected. It shows how authorities divide up and tackle food-related policy challenges, and lays the foundation upon which a holistic, food systems approach to policy can be built. A regular report on the 'state of the food system' could therefore be accompanied by a complementary update on food policy activities. A good practice example is the Food Matters One Year On Report, which was published as a follow-on to the 2008 Food Matters strategy, and provided details of progress since publication[73].

Part of the reporting could be linked to a set of food system indicators, building on work already conducted previously as part of DEFRA's UK Food Security[74] and Food 2030 food policy projects[75] (see below for more on indicators).

The 2021 Independent Review for the National Food Strategy for England included a recommendation for a 'national food system data programme' that would require government to collect and disseminate data across a range of topics, to underpin policy-making[76].

7 Dedicated Units/Agencies Within Government

Dedicated units of officials within government, focusing on food policy.

While there are many officials in a range of departments working on food-related policies, and temporary teams are set up to develop overarching food policy projects like a National Food Strategy, there is no permanent unit which is responsible for food policy in its broadest sense. In past years in England, a dedicated Food Policy Unit existed within DEFRA. Another agency – the Sustainable Development Commission[77] – also focused a significant amount of its resources on food policy research and recommendations.

While, again, little detail is public, DEFRA's Food Policy Unit was described as 'extremely well resourced at that time because it was a big political priority for our ministers', by an interviewee cited in research by Parsons (2017). The unit no longer exists in the same form or with the same broad remit, having since been merged with the Food and Drink Trade and Investment sector team from the (then) Industry Department 'to create the Great British Food Unit' which was aimed at supporting 'the growth of the food and drink industry – the UK's largest manufacturing sector – both in the UK and through boosting exports', bringing together teams from DEFRA and DIT and with support from UK businesses[78]. It is not clear if this unit is still operating.

There are examples of dedicated food units at the local policy level, however. The Greater London Authority – the local government of the UK's capital city – has a small but permanent team of civil servants working on food across the board. The London Food Programme Team, with the help of its advisory board, developed a food strategy for the city in 2018, and has been instrumental in embedding food issues across the departments of the city government[79]. One interviewee highlighted the lessons for national level food policy from London, where the team and its advisory board have supported joined-up governance, firstly simply by existing, and thus raising the profile of food as an issue of importance, and also by 'running between departments, sometimes quite literally. Or phoning between departments. And creating the moments when that joined-up is going to actually happen'.

8 Parliamentary Committees

Collaborations between several parliamentary bodies which address aspects of the food system.

Mirroring the departments of the executive branch of government, food issues are currently addressed by multiple parliamentary committees. These 'Select Committees' of MPs provide oversight of government, and 'check and report on areas ranging from the work of government departments to economic affairs'[80]. Committees decide on topics of inquiry, and take evidence from experts. Examples include the Environment, Food and Rural Affairs Select Committee[81], which has run recent inquiries on plastic food and drink packaging[82], and trade standards in the Agriculture Bill[83], and the Health and Social Care Select Committee[84], which has run several inquiries on childhood obesity[85]. Such committees have the potential to connect food policy issues and activities, because they have scope to draw in evidence from stakeholders across government and from all parts of the food system. An example of a more systemic approach is that taken by the House of Lords Select Committee on Food, Poverty, Health and the Environment, which conducted an inquiry and published a report in 2020[86].

There is also further scope to use Select Committees as a connection mechanism for food policy by creating a combined committee to bring together several committees which address different policy issues around food, in order to aid cross-government working. An example of an integrated select committee is the four-committee 'unprecedented joint inquiry on air quality'[87]. Similar possibilities could be explored regarding the numerous informal cross-party groups of members of both parliamentary houses (Commons and Lords) who join together to pursue a particular topic or interest[88]. These 'All Party Parliamentary Groups' (APPGs)[89] are not official parliamentary bodies, but nevertheless provide an opportunity for parliamentarians to engage with individuals and organisations outside Parliament who share an interest in the subject matter of their group. There are currently many APPGs covering issues related to the food system, but no overarching group to address connections between these issues, though there is an APPG for the National Food Strategy. Like Select Committees, there is some precedent for an overarching APPG to be created, for example the APPG on Cancer (there are also several APPGs for specific cancers)[90]. Relevant food-related APPGs include those listed in Table 2.

Table 2: APPGs relevant to food policy

APPGs relevant to food policy
Agriculture and Food for Development
Agroecology for Sustainable Food and Farming
Animal Welfare
Climate Change
Eggs, Pigs and Poultry
Fairtrade
Food and Drink Manufacturing
Food and Health
Food Waste
Fruit and Vegetable Farmers
Infant Feeding and Inequalities
National Food Strategy
Nutrition for Growth
Obesity
School Food

9 Dedicated Food Policy Bodies

Bodies (or a single body) to coordinate work on food, which may be located internally or at arms-length/independent from government. May be used to connect inside and outside government stakeholders working on food system issues.

A step beyond a unit of civil servants dedicated to food (see above) is a dedicated food policy body, which is responsible for coordinating activities, policies and evidence related to the food system.

Institutional reform, involving the creation of central agencies or integration units to support ministers and departments, has been a key instrument for addressing longer-term policy problems in other policy sectors. Successful examples highlighted in the literature include the creation of the former telecoms regulator Oftel (followed by Ofgas, Offer, Ofwat and ORR), the London Olympic Delivery Authority, the Low Pay Commission and the Office of Climate Change[91]. An instructive example is the case of climate change policy, where a poorly performing climate change programme review (a bottom-up process led by DEFRA which was failing to gain compliance from other departments) was aided by institutional reform: the creation of the Office of Climate Change led to cross-government analysis of issues and created a 'safe space' beyond inter-departmental rivalries, with a new team able to 'take a fresh look at the issue and was not 'stuck in the tramlines of old policy'[92].

While there are no obvious examples in the food domain, several types of new food body have been suggested to create – as a civil servant interviewee articulated it – 'a main artery … making the overall decisions on food policy so you can take advice … we want to do this. Would this work? No. Okay, what would work?', because ultimately any 'trade-off [decision] is going to have to be taken by somebody'. Following an extensive evidence-gathering exercise, the House of Lords Select Committee on food, poverty, health and the environment, recommended the establishment of an independent body, analogous to the Climate Change Committee, with responsibility for strategic oversight of the implementation of the National Food Strategy[93].

The Covid-19 pandemic has also been the catalyst for several proposals for new food governance bodies in England (and around the world). They include a call for a 'new independent and transparent food watchdog, free from ministerial, industry and other vested-interest influences', focused on providing dietary information to the public, to address the connection between obesity and Covid-19[94].

Several proposals which have been put forward for such a body make reference to a lack of national mechanisms 'to develop a holistic approach, integrating the different aspects of our food system into a joined-up policy framework'[95]. This can be compared to local-level bodies, where, as an interviewee put it, 'there's a lot of interesting stuff happening at more of community, city level … around local food and reconnecting people with the food system'. One option, therefore, is a food policy 'council', taking inspiration from the food policy councils[96] which are now prevalent at local level, or a new 'commission', similar to that which is under discussion in Scotland as part of the Good Food Nation policy (see below).

The People's Food Policy is a grassroots initiative launched in response to England's lack of a 'national food and farming plan, policy or legislative framework that integrates the compartmentalised policy realms of food production, health, labour rights, land use and planning, trade, the environment, democratic participation and community wellbeing'[97]. In 2017 the group published a manifesto outlining a people's vision of food and farming in England, supported by over 80 food and farming organisations. The report makes several proposals for a new approach to food governance, noting how 'at a municipal level, Food Councils, Food Partnerships and Food Strategies are becoming more common, appearing in a growing number of cities' and proposes the creation of a 'National People's Food Policy Council' (NPFPC)[98]. Similar observations around the lack of national government mechanisms compared to governance bodies at a local level have been made in the context of Canada creating its own national food policy, where the idea of a National Food Policy Council has been floated 'as an inclusive, transparent governance instrument that would work to ensure the implementation of the agreed national policy'[99].

Other national inspiration mentioned by interviewees included the dedicated bodies created in Brazil, in particular its Inter-ministerial Chamber for Food and Nutritional Security (CAISAN), created in 2007 to coordinate and monitor public policies related to food and nutritional security, and involving 20 ministries[100]. Closer to home, there is interest in discussions currently taking place in Scotland around a new Good Food Nation 'Food Commission'. The People's Food Policy, for instance, included a proposal for a Food Commission similar to the Food Commission in Scotland, which should include 'MPs, local council authorities, NGOs, unions, workers from across the food system and representatives from civil society[101]. However, the Food Commission in Scotland was only an advisory body, and has since been disbanded (see Box 3).

Box 3: A Good Food Nation Food Commission in Scotland

The original Scottish Food Commission (SFC) was formed in 2015, 'to develop a work programme based on achieving the priorities set out in the *Becoming a Good Food Nation* discussion document and the consultation analysis report that followed'[102]. The Commission included representatives from the food industry, government, civil society and academia, and its remit was:

- 'providing evidence-based advice on how to make Scotland a Good Food Nation, addressing the existing and potential future challenges facing Scotland's food culture;
- advocating the importance of good food to Scotland's health and wellbeing, environment and quality of life;
- establishing a mechanism for the Commission to foster local activity;
- reporting formally to the Cabinet Secretary for Rural Economy and Connectivity and through them to Cabinet'[103].

The SFC's role was 'advisory, not executive', and it met on a quarterly basis. It held its final meeting in 2018, where the 'Commission was deemed to have fulfilled its remit and disbanded at that time'[104]. Part of the SFC's work included proposing a set of indicators 'for realising the Good Food Nation vision', which it did in conjunction with the New Economics Foundation[105]. It also proposed a new statutory body to support the Good Food Nation Policy, noting that:

> *'existing bodies have statutory functions and duties in relation to the food system and environment, however a cross-cutting, holistic approach is needed for the Bill to ensure comprehensive reporting across the range of food issues, and to help maintain the momentum for implementation of change. Resources must be used effectively to avoid overlap and duplication'*[106].

But the proposal for a statutory body was not supported by government, which, in the Good Food Nation Bill consultation paper, stated:

> *'We do not see value in establishing an independent statutory body for the purpose of overseeing the Good Food Nation policy. Scottish Ministers have a presumption against the establishment of new statutory bodies in all but exceptional cases. This is not such a case. We consider that the establishment of a new body is unnecessary given the arrangements explained above and it would bring additional cost and bureaucracy'*[107].

The food industry has also raised the prospect of a somewhat different-sounding body taking inspiration from the Netherlands, where – according to an interviewee – 'they've coupled changes in their food policy with improvements in their farm efficiencies, their welfare standards, all those things have gone up in a sort of virtuous circle and where food is kind of part of the national psyche'. Actions are supported by a Sustainable Food Alliance, sponsored by the Ministry of Economic Affairs, which 'addresses the needs of the whole agri-food chain and includes making more sustainable use of raw materials, water and energy, reducing waste, utilising residual waste streams, ensuring good working conditions, improving animal welfare, animal and plant health, and human nutrition and health'[108].

One of the important considerations raised by interviewees is the location of such a body, and how it would navigate so many areas of policy responsibility. This is discussed further in the section 'Where does food fit?'.

10 Legislative Approaches

Mechanisms to enshrine food policy goals and implementation in law.

There is growing support for the notion that mechanisms such as strategies or groups – which may come and go – are not robust enough for the longer-term actions and perspectives required to address the food system, and that food policy should therefore be enshrined in legislation. For example, previous national food policy projects (such as the 2007-2010 Food Matters project described above) have been victims of changes in government. A leading official on that project said at a panel event on the planned UK national food strategy in 2019 that 'attempts that rely on organisation and exhortation are not likely to work … the only thing which will join up is legislative obligation … it will have to be legislation if things are going to last'[109]. The 2017 People's Food Policy (see above) proposed the creation of a 'Fair Food Act for England based on the right to food, agroecology and a food sovereignty framework', supported by a statutory Food Commission[110]. The National Food Strategy Independent Review, published in 2021, recommended a Good Food Bill[111].

Scottish food policy activities around a Good Food Nation Bill are aimed at underpinning 'the significant work already being done' under the Good Food Nation banner[112], as outlined in the Programme of Measures published in Autumn 2018 [113]. The proposals for legislation around the Good Food Nation ambition were first published at the end of December 2018, and a consultation took place in the first part of 2019. After a hiatus, a Good Food Nation Bill was introduced in the Scottish parliament in October 2021[114].

As part of the policy, the Good Food Nation Scottish Food Commission (SFC) had been formed in 2015 'to develop a work programme based on achieving the priorities set out in the Becoming a Good Food Nation discussion document and the consultation analysis report that followed'[115]. The SFC's recommendations included that the Bill include specific requirements across a range of different food policy domains, for example banning the promotion and marketing of unhealthy food in publicly owned buildings and at publicly funded events, and mandatory reporting of food waste for all organisations serving food[116]. However – though it may be subject to amendments - the Bill as it is currently conceived does not include any substantive policy commitments, and focuses primarily on the policy-making process, stating that 'where legislation is potentially required to deliver policy intentions in areas which could be seen to contribute to the Good Food Nation ambition, for example in relation to health, diet or food waste, then Scottish Ministers believe this should be taken forward through targeted legislation rather than the framework legislation proposed in this consultation', to provide a 'flexibility that would not be possible through the development of a

single piece of legislation'[117]. One of the difficulties is agreeing what can be made a statutory obligation, as a Scottish civil servant described at a panel event in 2019, stating that while there has been 'a strong joined-up and collaborative conversation' around the Good Food Nation policy, the challenges should not be underestimated, as 'joining up is hard to do' and in particular considering 'what could be written into legislation to give effect to that'.

The main features of the current GFN Bill therefore are statutory duties for Scottish Ministers to set out a statement of policy on food, covering 'food production and consumption issues relating to, for example and where applicable, the growing, harvesting, processing, marketing, sale, preparation and consumption of food, and disposal of waste arising from this; and access to affordable, local, nutritious and culturally appropriate food, and food in the public sector', and with reference to compatibility with relevant EU obligations and the implications of Brexit, and including indicators or measures of success. Ministers would then be 'required, in the exercise of their functions, to have regard to the statement of policy on food', which would be subject to consultation. The statement of policy would be laid before the Scottish Parliament 'for information rather than approval' and be reviewed every five years, with a report on implementation every two years[118]. These challenges around what is specific to food were raised by an interviewee in relation to England, because while the 'Food Act is this bucket into which many ambitions can be put … some of those ambitions have now come out and gone into the Environment Act [and some have] gone into agriculture policy'.

The Scottish Bill suggests how a legislative approach could also address vertical integration issues: the draft of the Good Food Nation Bill includes a requirement for 'public authorities with relevant food-related functions, possibly including local authorities and Health Boards' to set out a similar statement of food policy, which 'might include the origin and sourcing of food by the public authority; food waste; the emphasis on balanced and healthy food; access to affordable food; training in food preparation and purchase, etc.; the specific approach taken in, e.g., schools (including food education) and nursery schools, hospitals and public buildings[119].

A legislative approach may also include specific legislation on the 'Right to Food'. While the Right to Food is recognised in the 1948 United Nations Universal Declaration of Human Rights and was enshrined in the 1966 International Covenant on Economic, Social and Cultural Rights (ICESCR)[120], which the UK ratified in 1976, because it is binding in international law only, it 'has had limited impact on UK domestic law' leading to concern being expressed by both the UN Committee on Economic, Social and Cultural Rights[121] and the UN special rapporteur on poverty[122]. For this reason, civil society groups in the UK are campaigning for a legislative approach to the Right to Food. For example, the food and farming campaigning alliance Sustain wants 'the UK government to adopt legislation that upholds the Right to Food in UK law, securing a legally binding commitment for relevant authorities to work together to tackle food poverty and to end hunger'[123]. Similarly, the People's Food Policy recommended government 'establish legislation to protect and progress the Right to Food, to ensure the government upholds its obligation to ensure the Right to Food as a signatory of the UN International Covenant on Economic, Social and Cultural Rights'[124].

11 Procedural Mechanisms

Sets of procedural instruments, such as shared budgets or indicators, which incentivise joint working.

Mechanisms for connecting food policy to date have primarily focused on the softer, communicative end of the spectrum, with the use of national plans or strategies, and temporary

groupings of civil servants or ministers. At the other end of the spectrum, and with little evidence of any implementation in the food domain, are harder procedural instruments such as budgeting. An established observation from the policy sciences is how policy integration can be hindered by individualised budgets and indicators, which act as a barrier to cross-departmental collaboration. For example, in the face of requirements to contribute to additional cross-cutting activities, departments are likely to defend their budgets for existing activities and responsibilities. Incentive structures encourage more interest in what an individual department contributes to its own goals than 'corporate' (broader governmental) goals, or the goals of 'other' departments[125]. The challenges around connecting food policy through harder mechanisms were raised in a roundtable discussion with policy-makers conducted by the Centre for Food Policy in 2018, where 'indicators and budgets' were two key aspects pinpointed as problematic, and in need of further investigation, because 'falling back to your own indicators from your own subject' is not conducive to cross-cutting projects. Participants asked: could indicators be developed 'which don't just show nutrition outcomes or environment outcomes, but show outcomes of integration?'[126].

In relation to integrated budgetary mechanisms being used to connect food policy, no evidence of these being used in practice could be identified, though a joint investment approach was apparently explored in the attempt to create an integrated food plan in the Australian State of Victoria, utilising a single bid under its Budget and Expenditure Review Committee (BERC) system, according to a civil servant interviewed by the author for an earlier research project[127].

Both budgets and performance indicators warrant further exploration as mechanisms for connecting work on food across government.

12 Machinery of Government Changes

Re-design of ministerial portfolios, or re-allocation of departmental responsibilities, to connect food issues within a particular role or organisation.

Another potential way to achieve more policy coordination is by reconfiguring the 'machinery of government' (MOG) through the creation of different ministerial posts, reorganisation of departmental remits, or changes in portfolios, including through the creation of a 'special portfolio', such as the Minister for Equality. A new ministerial post, Minister for Food and Animal Welfare[128], was created in DEFRA in 2018, but said to be focused primarily on food supplies in relation to Brexit[129]. Proposals for a Minister for Hunger have been made by both civil society and food industry stakeholders, and were amplified during the Covid-19 pandemic[130].

The ability of British Prime Ministers to rearrange Whitehall departments has been described as 'a powerful tool to meet existing and emerging policy challenges'[131]. Such changes can have significant impact. For example, one interviewee talked about how long it took for the Food Standards Agency to create a unified internal culture , while in reference to recent Brexit-related departmental changes, another observed 'we haven't been re-coalesced, if you see what I mean, with working out what we're responsible for, agreeing on how we will work together and agreeing what the next step should be'. Food policy has been linked to some significant institutional changes in past years, including the creation of DEFRA and the FSA from the former Ministry of Agriculture Fisheries and Food; and the shifting responsibility for climate change policy out of DEFRA to a new standalone Department of Energy and Climate Change[132], and then the closure of that department and rolling of the climate change remit into BEIS[133]. More recently, MOG changes which reorganised policy responsibilities

from the FSA to DHSC and DEFRA were raised by interviewees as an important development.

At the more radical end of the scale of potential MOG changes is the creation of a 'new food department', a 'Ministry of Food', which one interviewee admitted was 'probably too big an idea, but … that convening power would be fairly interesting by comparison to what DEFRA sees as its current role'. Another agreed that 'to be quite honest the whole [EU] exit thing provides a massive opportunity for people to say, well actually we don't like the current system so we don't understand why DEFRA do this or DEFRA do that, so why don't we take this opportunity to reinvent everything?' But the interviewee questioned whether Brexit was the right time, because of the flux associated with the exit process: 'If you're going to do that then maybe five or six years down the line [is better], after exit and everything is settled down'.

A less radical possibility under discussion is altering the remit of the FSA. This was proposed in the National Food Strategy independent review of 2021, and was the subject of more detailed discussion during a House of Commons Select Committee inquiry into the European Union, where a former chair of the FSA highlighted how 'various elements of the Food Standards Agency's remit in relation to labelling and nutritional advice were taken away in 2010 when Andrew Lansley was Secretary of State for Health, and it seems to me this could be an opportunity to say: "We will re-emphasise our independent world-leading agency by giving it back its original responsibilities"[134]. An interviewee felt taking practical action on sustainable dietary guidelines would be much better supported if responsibility was taken 'out of the hands of Department of Health and put back in the hands of the Food Standards Agency: 'make it clear that they are the department for linking these together. That way everyone knows where to go and there's no confusion on it'.

Box 4: The unresolved question: Where does food fit?

There is not necessarily a natural 'home' for food in the current governance framework[135], or as one interviewee put it, 'it doesn't sit neatly in any one place'. The lack of evidence on 'what works' in terms of food governance mechanisms means devising the most effective way to organise food policy responsibilities or oversight leaves several questions unanswered. Discussions with interviewees coalesced around two key themes.

The first was whether it was sensible to bring food policy activities together in a dedicated body. One interviewee felt that a Ministry of Food, would be a 'great idea'. Another felt that combining responsibilities in the same department might make it easier to address tensions between different objectives – for example responsibility for the food industry and health under the same roof would provide an opportunity to address disagreements on obesity policy. But other interviewees were sceptical about bringing different interests together in one department because that would make addressing tensions more difficult, for example if you had 'the same organisation worrying about trade and health policy'. However, the overriding view from government interviewees was there would be problems with bringing the different food-related issues together, primarily around manageability. For example one felt, 'if you integrate all food policy and put it in one place, then government [will] be totally overwhelmed and it will be really difficult to decide how to prioritise work. And also, it would be impossible because you still have to deal with other departments. It's like you can't have a single government department doing everything'. Another noted that 'if you had a ministry of food [it] would be very, very large – and … once you get very big and very political,

how independent do you stay?' Another said, 'food is not alone in complexity … you can't take it out from everything else. And if you did it would lose out… You couldn't have a food ministry'. Putting it a different way, another said, 'you can't have food just be the responsibility of one government department because it overlaps with so many different areas of policy-making'.

An alternative to a dedicated department is making an existing department with a role in food policy the lead organisation. In England, in many ways it makes sense that this be DEFRA, given it is the department with 'food' in its title. An option proposed by one interviewee was to create 'some focal point for food in DEFRA that reached across government and brought in other players. That would set it up as much more the leader of food policy'. But there was also acknowledgement that DEFRA is not responsible for *all* of food policy. Similar reflections have been made about more recent proposals to enlarge the remit of the Food Standards Agency to enable it to address nutrition[136]. The previous *Food Matters* cross-cutting project was run from the Cabinet Office, which supported the project team to enable departments to work together. One interviewee agreed that – while leadership is more important than mechanisms – 'as a signal you'd want a unit, probably within No. 10 or the Cabinet Office'. But a lesson from the Food Matters project is that, because Cabinet Office projects are rarely retained within that department and are passed on to other departments to implement – in the case of Food Matters, to DEFRA – there is a limit to how much the benefits of its involvement can be retained[137]. Nevertheless, another interviewee said that any food-related project should be hosted by the Cabinet Office, because 'it can't make a lot of these things happen but it's pretty good at holding ministers to account'.

While there were different perspectives on the appropriate departmental lead, there was some agreement from interviewees that better *clarity* on leadership would be important: 'there's something about knowing who the lead department is, and I think at the moment, there isn't that clear structured leadership'.

Another question when designing mechanisms such as a food policy body – or even deciding which should be the lead department for a national food policy – is *where* in government it might be located. A body could be sited in central government, or within a particular department. It could be located inside government, or outside at arms length. Interviewees described pros and cons associated with the different options. For some, having a policy body or lead inside government would make it infinitely easier for that body to work with the departments it needs to work with. Some highlighted the practical dilemma that with any dedicated food body, on the one hand 'you want it at arm's length, because a lot of the problems with food have been political, and you want it transparent. But then on the other hand, if you have it too arm's length, does it get side-lined?'

Other interviewees suggested that – rather than focusing on a dedicated body or department where everything is brought together – ensuring food is considered and embedded 'in all policies' would be a more sensible approach, building on work which has been done on public health, and more specifically on health inequalities.

Conclusion: mechanisms need political support and the capacity for joined-up decision-making

This report has outlined a typology of mechanisms which might be part of a more joined-up framework for food-related policy in future. Some options are, or have been, employed in practice in food policy-making. Others remain untested ideas, borrowed from other sectors or merely proposed by stakeholders. Some represent a more radical departure from the status quo than others. All should be subject to further scrutiny, as it is unlikely that any single mechanism can provide a perfect solution to better food policy-making. Together, they can nevertheless offer useful counterweights to 'departmentalism', and there is potential for multiple mechanisms to be used in concert, to address different needs.

Across all of the possible mechanisms, one common caveat offered by interviewees was that structural or procedural arrangements alone are not sufficient. Two additional enabling conditions seem to be vital: *political (and beyond it public) support and connected policy-making capacity*.

Mechanisms, as past experience in the UK and elsewhere has demonstrated, are vulnerable. The food policy institutions created in the UK at the end of the 2000s did not survive long term. As an interviewee who was involved explained, 'it's all about leadership. So if we had… If it wasn't a Prime Minister, one of the top three officers of state kind of leading the charge, then things would happen', because 'leadership matters more than the machinery of government that follows it'. Another agreed: 'it's all really, really simple – you need strong political support, sustained political support', noting that, for the work on childhood obesity 'it helped having the same Health Secretary for what is one of the longest periods of time'. Another went further, arguing 'it's not a governance issue – I would say [it's] a real lack of leadership, rather than governance, that nobody in government is really trying to make the case that we will have to move in this direction, not today but even in five years' or ten years' or 15 years' time'.

Scale was mentioned as a factor here: it was easier to generate political support in smaller jurisdictions. Interviewees commented that Scotland 'are trying to drive some of those discussions', which is easier than in Westminster 'because it's a smaller government, which means it is easier to get everybody together in a room, and if you look around the globe, those governments that are really starting to move are typically smaller nation states. Whether it is the Nordic countries or Scotland or even Singapore, a bit of Mexico, Brazil's a bit of the exception, but it becomes easier when you can get everybody together in a room and deal with the politics by a teamwork approach. You just can't do that in Westminster'.

Linked to political support for addressing food is the influence of public acceptance of policy intervention, and the need for a strong enough political mandate. On the Childhood Obesity Plan, for example, an interviewee said it was 'about will' and 'the thing that's making this stuff happen is the cost [of obesity] to the NHS and to the Exchequer. It's not sustainable'.

There is only so far the mandate will stretch, however, as highlighted by an interviewee in relation to health inequalities, where there have been discussions about more targeted interventions toward the poorest families. In this interviewee's view, the reality is that politically this would not work if it looked as though support for others was being removed.

For this reason, one interviewee concluded that in terms of creating new coordinating mechanisms, it is 'too early for that formal governance … because every way that you look at food and people's diets

and people's ability to choose, it looks toxic if you're trying to move the system in a way that looks regressive, to eat more expensive food [or eat] in different ways. We couldn't have a Climate Change Act until there was enough public acceptance, and widely discussed data, that we have to deal with climate change because it's a long-term threat. We aren't at that level yet [with food], to make that politically palatable'.

The second important condition for more connected policy-making is likely to be designing-in capacity for sharing information and identifying where connections are required – a 'coordinative culture' more broadly, whereby policymakers have the skills, and built-in opportunities, to think about food policies in a more holistic way[138].

Further research is required to better understand the role of capacity and culture in supporting more formal administrative mechanisms. There is also a need for more empirical evidence on food governance arrangements in different countries and cities, and their impacts.

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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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