



From: Professor Tim Lang, Professor Erik Millstone, Professor Terry Marsden

AN OPEN LETTER ON THE FOOD EMERGENCY TO THE PRIME MINISTER AND GOVERNMENT

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Dear Prime Minister and Ministers,

We write as academics and food policy specialists seeking to clarify lessons learned so far from the combined effects of Brexit and Covid-19 on the UK food supply. Although the EU-UK Trade and Cooperation Agreement (TCA)¹ eased alarm over immediate disruptions, these are continuing at ports for both imports and exports.^{2,3} The jury is out as to whether these are mere ‘teething problems’ or permanent features of the new normal. Our view is that completion of the TCA now brings into view other, deeper problems and risks which we raised with you in previous letters and which require and still are not receiving sufficient attention. We see little chance of 2021 being substantially easier on the food front unless these policy challenges are addressed. They are essential to the delivery of the ‘levelling up’, ‘taking back control’ and ‘we are all in this together’ national cohesion agendas. They are not just important in themselves but could also shape how the UK and its leadership are seen at the UN Food Systems Summit in October and COP26 in November in Glasgow.

1. The civil need for ‘food defence’ for food security

At the heart of a Government’s food responsibilities are the duty and capacity of the state to protect the nation’s food supply. This is what is meant by the term ‘food defence’.⁴ It is the means by which a society ensures the delivery of food security for all its people – feeding them healthily, affordably, reliably and without damaging the environment.⁵ Food defence thus requires weaknesses and risks in the agri-food system to be identified, diminished and as far as possible eliminated.

All governments are bound by commitments to the right to food, which have been elaborated since the UN Declaration of Human Rights (of which the UK was a prime mover).⁶ National food defence in the modern world is about delivering the infrastructure, policies and practices to ensure domestic food security.

Our concern today is that insufficient attention is being given to the civil side of food defence. This includes a failure adequately to engage with the public to ensure they are cognizant of, and involved in, doing the right things. Both in Brexit and the Covid emergency, UK consumers were left without advice as to what to do to protect their food security at the household level. During the first lockdown the Government actually made the situation worse by closing the hospitality sector (rather than re-orienting it at and for the community level), which cut consumers off from the source of about a quarter of their food.⁷ This tacitly provoked consumers to stockpile from retailers, thus emptying supermarket shelves. Stopping that kind of reaction is what the Civil Contingencies Act 2004 and the Critical National Infrastructure monitoring systems were set up only a few years ago to address.^{8,9} They had been created in part as a result of lessons from events such as the UK lorry drivers’ strikes in the late 1990s,¹⁰ and the threats from terrorism to food distribution.^{11,12}

Those lessons were given extra impetus when food price volatility occurred during the 2007-08 commodity price shock, and led to structural analyses of UK food insecurity, and constructive recommendations, only for them to be neglected since 2010.¹³⁻¹⁶ Since then, analysts have continued to offer strategic assessments highlighting the risks to the UK of food insecurity from global geo-politics and identified potential chokepoints for the UK.¹⁷⁻²⁰ Despite all this, the necessary preparations for food defence have not been set in place, undermining future UK food security. This must not continue to be the case.

When major bodies representing the food industries (such as the British Retail Consortium, the Food and Drink Federation and the National Farmers Union) were publicly expressing fears about imminent disruptions,²¹ the lack of advice to consumers on how to protect themselves became daily more conspicuous. There was silence from Whitehall about how consumers might navigate the crisis, whether or when to stock up with food supplies, and which foods to choose to protect health. No relevant advice emerged from Public Health England (PHE), the Food Standards Agency (FSA) or the Department of Health & Social Care (DHSC), despite those bodies being responsible for protecting public health. By contrast, for example, Sweden advises households on food as part of emergency preparations.²² With PHE reported to be set for re-organisation, this lack of leadership in helping the public should be addressed.

This ought to have been anticipated. Even before Covid-19, the market researcher Kantar WorldPanel had reported that 62.5% of a national sample in 2019 worried about the prospect of a No-Deal Brexit, with 10% reporting that they were already stockpiling and a further 25% considering doing so, with food much the highest concern.²³ Why then was there no planning for, or provision of, public advice about food, which could have been brought into play when Covid-19 caused some of the effects a No-Deal Brexit had threatened? And why was there no health advice about ensuring a decent diet during the pandemic and in the various lockdowns?

The Government's duty under the Civil Contingencies Act 2004 to communicate with the public was not being met.²⁴ Since food is part of the Critical National Infrastructure, the failure of Defra, DHSC, PHE or FSA to advise the public properly suggests that public safety and morale were not addressed in crisis planning or management. This was a public policy failure. Food is always a matter not just of nutrients or affordability but also trust, confidence and morale. That was one of the many lessons learned from how food policy was managed in World War II,^{25,26} and from the food scandals in the 1980s and '90s, such as BSE.²⁷ Measured against past experience, current advice about food defence and household protection as a means of ensuring UK food security has been weak.²⁸ It needs to be updated and reinjected into public policy.⁴

We therefore urge that a review of food defence planning and implementation be established, which gives due attention to the role and responsibilities not just of central government but also of the devolved administrations, regions, cities and community levels.

2. Policy cannot be left to the food industry

In the first tough Covid-19 lockdown, the Government put almost total responsibility for feeding the nation onto the supermarkets. With just nine giant chains accounting for over 90% of the food retail market, these companies already had overwhelming power in the UK's food system.⁴ During the Covid-19 pandemic, food retailers both large and small have increased their share of the total UK agri-food system turnover. The long-standing tensions between the major forces in the food chain – manufacturing, retailing and hospitality – have been further skewed in retailing's favour. Supply chains servicing hospitality have taken a serious blow, with many independent, and small and medium-sized food suppliers brought to their knees. The current additional problems of overseas trading brought about by Brexit are exacerbating those problems for small and independent

food businesses. Meanwhile just in the retailing sector, Kantar calculated that Covid reinvigorated some small, local, ‘fascia’ and ‘corner shop’ grocers; and an initial 63% surge in sales was reported for the first few months of Covid.²⁹

The Government’s reliance on the large retailers in particular to maintain food supplies was a risky approach and an economic mistake, if one favours a diverse economy. Since the new year, it is noticeable that smaller food companies are more worried about the cost of post-Brexit Customs declarations and the new bureaucracy, as has been voiced not least by the seafood exporting sector.^{30,31} It held the first major protest about such difficulties and, mindful of its symbolic importance in the Brexit debates, is to ‘get help’ from a £23m compensation fund for the consequent losses.³²

Looking ahead, surely a policy of decentralisation and diversity would be more appropriate for food resilience. Reliance on a handful of actors creates significant risks should their supplies be disrupted. Yet a centralised strategy was again being reinforced when, in December 2020, ministers were reported to be warning supermarkets ‘to stockpile food’ in case of shortages,³³ but not advising consumers to do likewise.

Awareness of the systemic risks inherent in Just-in-Time (JIT) logistic systems is one important lesson from Covid. Indeed, mindful of their own JIT exposure, the major food processors and retailers pressed upon Government how quickly supplies might be disrupted, when they were contemplating the possibility of a No-Deal Brexit. The Government must now come to terms with the fact that there is very little capacity for extensive food stockpiles or warehousing in the UK’s food system, as it is currently organised. The primary purpose of JIT logistics is to cut cost by not carrying stock. With Cabinet ministers now talking of ‘bumpy rides’ or ‘teething problems’ ahead,^{31,34} whether arising from Covid-19 or Brexit, this strategic weakness needs to be addressed. Current arrangements are very vulnerable to supply disruptions, and those vulnerabilities need to be tackled; again, solving those problems cannot just be left to the major retailers.

The group of food industries currently advising the Defra ‘war room’ is not sufficiently diverse to meet policy needs. Talking with industry is essential but addresses only one side of the food coin. The public interest cannot be assumed entirely to coincide with industry’s. Tensions within the food system require public policy-makers actively to engage with consumer and civil society representatives. The National Food Strategy (NFS) for England being led by Henry Dimbleby must provide a fresh policy framework for the UK, rather than the current approach which is dominated by industrial and commercial perspectives, while excluding or keeping at arm’s-length consumer and public health considerations. We therefore urge that the National Food Strategy Part Two report, said to be due in April or May, should be brought forward as speedily as possible to provide that essential reorientation of UK food policy.

3. A new advisory structure for food is needed

In spring 2020 we wrote to you recommending that an expert advisory body on food be established to advise on food matters in the context of emergencies.³⁵ Subsequent events have reinforced the case for such a body. Whether the issue is inadequate welfare parcels to the needy, providing food for disadvantaged children during school holidays, ensuring good diets to optimize health in the crisis, or protecting general consumer and health interests, inadequate attention is being given to those considerations in Whitehall. The new emergency advisory body could simply be an equivalent to the Scientific Advisory Group for Emergencies (SAGE), i.e., a Food Advisory Group of Experts (FAGE). Another option could be for an expert group to be a sub-committee of SAGE similar to the Scientific Pandemic Influenza Group on Behaviours (SPI-B).³⁶

The need for such an advisory body should not come as a surprise. Until 2000, the long-established Committee on Medical Aspects of Food Policy (COMA) had a wide social as well as nutritional remit – a legacy from World War II when there was a battery of advisory systems, some strategic, some public-facing. But COMA was abolished and replaced by the Scientific Advisory Committee on Nutrition (SACN), which for the last 20 years has had a far narrower remit.³⁷ Nevertheless, in the Covid crisis we had expected that nutritional advice on how to eat to enhance immune responses in the pandemic would be provided from somewhere in the Whitehall machinery, but no official advice has been forthcoming. The social, nutritional, environmental and strategic advice has been missing just when it is needed.

Part of the problem here is that food is a cross-cutting issue, as the Cabinet Office realized by the late 2000s.¹⁶ It is everyone's business, so it is easy for no-one to take responsibility for the big picture.³⁸ At least 16 different UK departments and ministries are today responsible for decisions that affect the food system.³⁹ When food is in schools, it's the responsibility of the Department for Education – except during school holidays; hospital food is the responsibility of the Department of Health and Social Care and its subordinate agencies; the diets of consumers on low incomes are dependent on the policies of the Department for Work and Pensions and affected by prevailing rates of pay and levels of employment; food standards are nominally the responsibility of the Food Standards Agency, but they are currently being negotiated by the Department for International Trade, yet concern everyone. And so it goes on. The Government has yet fully to recognise the urgency and complexity of the UK's food problems.

This is why Government needs to have not just advice in a time of emergency, as now, but a better set of advisory bodies that can identify and analyse the problems, providing anticipatory, coherent and practical advice. We think attention is needed across Whitehall on what is required from the advisory system. As a whole it needs to be capable of providing precautionary advice across a broad range of issues, supported by strong, independent and authoritative advisors, and given procedural transparency sufficient to ensure sustained public trust. Possibilities for harnessing the UK's broad (i.e., natural, medical and social) scientific advice base were illustrated in 2020 by the 'Rebuilding a Resilient Britain' programme.⁴⁰ This was led by and reported to the Chief Scientist, Sir Patrick Vallance, and involved the Universities Policy Engagement Network, UKRI research councils, the What Works Centres and the National Academies. The country needs not just ad hoc advice, tailored to the moment, but also to rebuild the depth of policy advice for the entire food system. Food policy will remain an Achilles' heel unless thought is given to this. To this end, we recommend the creation of a permanent National Food Security Council, to provide advice on the long-term direction for the UK agri-food system to enhance UK food security and sustainability.

4. The diets of at-risk social groups, especially people on low incomes, must be protected

Covid-19 led to rapidly increasing demand for the services of food banks. Independent food banks, for instance, saw a 137% increase in need for 3-day food parcels from February to November 2020.⁴¹ Food poverty has increased substantially from a level that had already concerned public health experts in the mid 2010s.⁴² In 2009, the charitable food bank network the Trussell Trust distributed 41,000 food parcels; in 2019 the tally was 1.6 million; in late 2020 it was over two million.⁴³ Data from the campaign group Food Foundation for the footballer Marcus Rashford's Child Food Poverty Task Force estimated that 14% of UK families with children (around four million people) reported experiencing moderate or severe food insecurity by September 2020, a rise from 11.5% six months earlier.⁴⁴ Financial stresses affecting food consumption have been exacerbated not just by the working of Universal Credit (documented, for example, by Herriot-Watt University I-SPHERE research for the Trussell Trust),⁴⁵⁻⁴⁷ but also by loss of earnings when told

to quarantine, driving at-risk (and potentially infectious) people back to work. Complex pressures on incomes and food consumption look set to continue in 2021, and they will have longer-term impacts on UK public health, which is already seriously unequal in diet-related ill-health and life expectancy.

Despite noble work, public generosity, and government grants to food distribution charities such as Fare Share, it is evident that food charity cannot adequately substitute for a properly functioning welfare system. A form of postcode food charity lottery has also emerged, with poorer areas that need food support most receiving least. Certainly food banks have only been able to provide patchy and often inadequate protection for the weakest in society.^{46,48,49} Inadequate protection of children is a particular concern.⁵⁰ In low-income regions, already weak structures and stark health inequalities mean that charities find it difficult to cope with demand.⁵¹ This surely presents an opportunity for the embattled hospitality sector to be used, organised on a local basis, to provide necessary emergency feeding centres.

In the National Food Strategy's Part 1 report, Henry Dimbleby rightly advised that, as a matter of priority, support should be provided for people on low incomes to enable them to purchase a decent diet.⁵² It took the efforts of a footballer and his mobilization of public support to get the NFS recommendations (which reflected an overwhelming consensus among food poverty specialists) acted on. Through much of 2021, the country is likely still to be under great strain. Vaccinations are highly welcome but will not end the Covid crisis. Expecting food banks to fill the food poverty gaps is a recipe for continuing and increasing health inequalities, as Professor Sir Michael Marmot has warned.⁴⁸ We share his and the Health Foundation's concern that any 'building back better' policy should concentrate on 'building back fairer'. This wealthy country, with an aspiration to 'level up', needs income and supply systems that provide access to a sufficient and healthy diet for everyone in the UK. The deepening of food poverty in what is currently the sixth richest country in the world is a disgrace. The 'levelling up' goal will not be met unless food poverty eradication is a central feature of the Government's policies and strategies.

In the short term, could not the rate relief the Chancellor gave to the giant supermarkets, which to their credit most (but not all) returned, be used to support households who would otherwise go hungry, and to create a proper food welfare safety net in 2021?⁵³ Mechanisms to ensure that all UK residents receive a decent and environmentally sustainable diet are urgently required. Something is wrong if low pay is having to be topped up by food parcels. The costing of a decent, healthy and sustainable diet should take adequate account of age, income and vulnerability. Surely this would be in the spirit of Winston Churchill, who when Prime Minister approved rationing and equitable food distribution as a national strategic imperative.^{54,55} Food remains a strategic imperative today in a different context.

5. Immediate opportunities

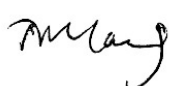
This is a crucial moment of national challenges and changes. Our argument is that more high-level attention must be paid to the multifarious fault-lines in the UK's food system. Much can be learned from what has already emerged in the Covid crisis and the TCA finalization. We have sought here to identify a set of potentially beneficial actions. Taking these measures promptly will reduce the future financial and human costs to the UK economy and society.

Our proposals are to:

- Institute an immediate review of food defence to enhance the UK's domestic food security. This should pay particular attention to the needs of civil society and consumers in relation to food supply resilience and crisis preparedness.

- Create a new Food Advisory Group for Emergencies (FAGE), either equivalent to or as part of the Scientific Advisory Group for Emergencies (SAGE), to provide emergency advice to government at all levels. This should draw on a broad base of academic disciplines.
- Create an independent National Food Security Council to provide advice on long-term direction for the UK agri-food system to enhance UK food security, without undermining food security in the countries with which the UK trades.
- Bring forward the National Food Strategy Part 2 report to fill the current food policy vacuum, and diversify the range of interests informing public policy.
- Provide clearer guidance to all parts of the UK's agri-food system (not just large companies) about the steps that should be taken to diminish the risks of food supply disruption, and also about how crises should be managed in the event of supplies being disrupted. The Civil Contingencies advice is weak, has not been useful, and needs to be revised in the light of Covid-Brexit experience.
- Ensure the interests of small and medium-sized food enterprises and the hospitality sector are taken into account in resilience planning, to avoid a repetition of reliance on a handful of giant food retailers.
- Ensure improved co-ordination between the role of central government, the devolved administrations and local authorities over food matters. The PHE, FSA, and devolved equivalents, or successor bodies across the UK, should be instructed jointly to produce appropriate nutritional advice for enhancing nutritional immunology in the face of the Covid pandemic, and during future emergencies. This should be updated regularly in the light of changing food security and food defence conditions.
- Ensure all Resilience Forums provide more coherent and public-facing food leadership and preparations for food emergencies at the local and regional level. Resilience Forums should include consumer and civil society organisations and health professions as members. Commit to eradicating food poverty in programmes to 'build back better'.
- Deploy resources from the closed hospitality sector, organised on a local basis, to provide emergency feeding centres.
- Commit to reducing reliance on food banks and food parcels, which will never adequately substitute for having sufficient income to afford nutritious diets. This should include ensuring that welfare benefits are sufficient to ensure that all recipients can afford healthy and sustainable diets.
- Task the Low Pay Commission to review why low pay is having to be topped up by benefits or food support and whether the calculations of food costs in living costs are sufficient.
- Allocate the returned supermarket rate rebate to fund an emergency food relief system with national remit.

Yours faithfully,



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