Response from the Independent Food Aid Network to the Labour Party Consultation on a Sustainable Food Policy

About our organisation: The Independent Food Aid Network (IFAN) represents independent food aid providers including non-Trussell Trust food banks operating across the UK. Our organisation envisages a UK where everyone can eat good food and food aid is no longer necessary. To fulfil this vision, IFAN has three main aims: to connect members to each other to share best practice and ideas; to connect members, researchers, journalists and members of the public to provide a variety of learning opportunities, support current research, shape future research and strengthen advocacy efforts; and to call for the structural changes needed for food aid to be reduced and eliminated in the long-term.

Summary: We very much welcome the Labour Party’s Sustainable Food Policy, but we feel that overall its vision could go further. There needs to be full recognition that food poverty, or food insecurity, is the result of a complex set of structural issues relating but not restricted to problems of insecure, inadequate and expensive housing, insecure and low paid employment, insufficient social welfare provision, poor health, and environmentally unsustainable and socially unjust food production and distribution system. As well as full recognition of the importance of good food and wellbeing and that growing food, taking food beyond the cash economy and connecting with nature contributes to individual and community health and provides space for wider civic engagement.

Responses to the consultation questions:

Food Sovereignty:

1) Are these the right principles on which to build our food policies?

We believe that Food Sovereignty is the right framework from which to build the Sustainable Food Policy. Food sovereignty principles in a UK context provide a framework for a rights-based, democratic, just and sustainable food system. Please see A People’s Food Policy¹ of which IFAN is a signatory and current member of the phase 2 development team. It summarises the Food Sovereignty principles for an ‘English’ context, in the PFP document on page 16.

¹ https://www.peoplesfoodpolicy.org/
2) Are there other core principles we should adopt?

No.

3) What form should a Right to Food take?

The UK’s commitment to international obligations on the Right to Food must be explicitly enshrined in national legislation. The root causes of poverty need to be addressed and there needs to be long-term protection through legal frameworks so that all people can access food and feed themselves with dignity, either by producing their own food, by buying it or other means of exchange. It should be affordable, adequate, nutritious, accessible and culturally appropriate. The Right to Food does not mean that individuals and groups have a right to be provided food. It means that one has the right to feed oneself in dignity.

4. Should we be aspirational and visionary in our approach, or should we be measured and incremental?

We need to be aspirational and visionary as is described in A People’s Food Policy. We also need to measured and incremental based on qualitative and quantitative research. There are also many examples of countries where sustainable food systems are working well, such as Denmark, from which we can learn from in developing a national food policy.

5. Should we establish in law a universal right to healthy food or should we first prioritise the rights of access to healthy food for certain population groups, such as school children; expectant mothers; elderly and vulnerable people receiving care?

We should establish a universal right to healthy food in law as a first priority. In so doing we will also be supporting the rights of access to healthy food for certain population groups. To establish the Right to Food in law as universal, more involvement needs to be sought from grassroots projects and those most impacted by the inequities of the food system with the aim of creating systemic change and ending the need for food banks. Some countries like Colombia include “disadvantaged” groups in their national right to food legislation. This is to ensure they are meeting the right to adequate food and nutrition, and other rights and international conventions, such as the Rights of the Child and CEDAW. As such rather than prioritization of certain groups the inclusion of these groups in law recognises that they are more likely to be impacted by food insecurity. Therefore, in in order to ensure their rights to adequate food and nutrition due diligence should be undertaken through statutory, centrally funded or directed measures. An example is the Healthy Start voucher scheme for children. As such a universal right to food must also ensure the rights of asylum seekers and refugees who currently depend on charitable food aid.

2 https://drive.google.com/file/d/0ByOC-u0iVRMGLUVKem12RHNhMU0/view
6. Should there be a duty to provide food or should the duty be to avoid hunger, or malnutrition?

The Right to Food must also involve duties to avoid hunger and malnutrition. The UK is facing a crisis in obesity and malnutrition disproportionality affecting disadvantaged and vulnerable groups, those on lower incomes and with no recourse to public funds. See chapter 2 of the People’s Food Policy for more detailed proposals in this area.

Land:

7. Is there a need to review and reform land law and public land management systems in order to underpin a sustainable food system?

There is a need, in the context of developing the UK’s food security and a resilient food system, to review and reform current land legislation. Land in the context of a national food policy is about access, planning and tenure. Most land in the UK is privately owned. So public land management and legislation relating to it is only a minor consideration in terms of increasing food production, markets, processing and food access.

8. Should we establish a Land Commission to conduct a review and make legal recommendations and, if yes, what should its remit be?

A Land Commission could be part of the democratic governance of land within an integrated food policy. Its remit would be to ensure that land is acquired and managed for food and seed production, and auxiliary services such as processing and storage, whilst delivering environmental and social benefits. It would also ensure that other land use in both rural and urban settings, e.g. housing and social and cultural use such as parks, burials and so on - Please refer to A People’s Food Policy, June 2017, Land p 50 which introduces the concept of a Land Commission for England along with detailed proposals.

9. Should we seek to integrate our vision with that of the devolved administrations which operate under different systems?

The vision should be integrated within devolved administrations with the understanding that delivery of a food policy will be adjusted to local context and that it can all be underpinned with the same principles such as food sovereignty and a rights-based framework.

10. What should a sustainable land policy look like?

A sustainable land policy should look like a knowledge-based procedure that helps integrate land, water, biodiversity and environmental management (including input and output

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3 https://drive.google.com/file/d/0ByOC-u0iVRMGLUVKem12RHNhMU0/view
4 https://drive.google.com/file/d/0ByOC-u0iVRMGLUVKem12RHNhMU0/view
externalities) to meet rising food and fibre demands, all while sustaining the ecosystem’s services and livelihoods. A sustainable land policy is necessary to meet the demands of a growing population. Improper land management can lead to land degradation and a significant reduction in the production and service functions of landscapes.

**Food Production:**

Food production should be sustainable:— economically, environmentally and socially, and contribute to the overall purpose of feeding people healthy, nutritious, culturally appropriate, accessible and affordable food. Under current systems of food production, this is not achieved for everyone. More local production and consumption should be prioritised, with short supply chains to ensure fresh, seasonal food is available whilst minimising transportation costs and simplifying distribution logistics. Please see Chapter 2:— Food of the People’s Food Policy for detailed proposals in this area⁵.

11. **What are the national and international barriers, legal, commercial or administrative, that might constrain our development of sustainable, healthy and efficient food systems?**

Please see chapters 8 and 9 of the People’s Food Policy for detailed proposals in this area⁶.

**Food production and distribution:**

12. **What measures should we take first to ensure local food production is environmentally and economically sustainable?**

Local food production should be based on the three pillars of sustainability: social, environmental and economic stability. There should be improvements to technical knowledge on the environmental impacts of food production and to stimulate the use of sustainable food production methods. Plans should be made to promote sustainable food consumption, reduce food waste and losses through education and the development of new routes to markets. There should be an improved local food policy coherence with public procurement, supportive business rates, rent rebates and the use of public land and buildings.

Please also see chapter 2 of the People’s Food Policy for detailed proposals in this area⁷.

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⁵ [https://drive.google.com/file/d/0ByOC-u0iVRMGLUVKem12RHNhMU0/view](https://drive.google.com/file/d/0ByOC-u0iVRMGLUVKem12RHNhMU0/view)
⁶ [https://drive.google.com/file/d/0ByOC-u0iVRMGLUVKem12RHNhMU0/view](https://drive.google.com/file/d/0ByOC-u0iVRMGLUVKem12RHNhMU0/view)
⁷ [https://drive.google.com/file/d/0ByOC-u0iVRMGLUVKem12RHNhMU0/view](https://drive.google.com/file/d/0ByOC-u0iVRMGLUVKem12RHNhMU0/view)
13. What most constrains the economic and environmental sustainability of food producers?

The key limitations on the sustainability of food producers are resources: land, water, energy, soil degradation, climate change impacts, the cost of land and insecure agricultural tenancies. There are socioeconomic impacts driven by the corporate market system which affect food producers. Lack of affordable housing for food, unfair working conditions, low wages, no recognition of the true costs of food, and artificially low prices.

14. How can we best tackle food waste?

To tackle the problem of food surplus, we should devise a system of policies, incentives and punitive measures that include, but are not limited to:
1. A statutory requirement at critical points of the food supply chain to report on food waste;
2. Avoiding food surplus - supermarkets and food manufacturers should incur a tax if surplus food sent to landfill;
3. Surplus food diversion to animal feed and composting or energy schemes should be a mandatory rather than voluntary requirement with incentives such as reduced business rates;
4. The development of more direct to consumer and short supply chain schemes, such as community supported agriculture and fisheries, and more local markets.

This will result in the reduction of food waste while minimising our impact on the environment and mitigating climate change thus developing a more sustainable food system. These developments could be partially funded by the taxation.

We do not believe that redistribution of surplus food to those in household food insecurity is a solution for reducing waste. Nor is this a solution for household food insecurity despite the fact that many of our members depend on surplus food to support people in need in the here and now. It is the complex structural issues that lead to poverty which need to be addressed through income-related strategies including the payment of living wages and fit-for-purpose social welfare safety net.

The Workforce:

15. What changes are needed to improve working conditions and safety in the food production and distribution industries?

A national food policy should put people at the centre, with their health and safety as paramount as well as having just working conditions not being limited to forms of extreme exploitation like modern slavery. A rights-based approach not only promotes dignity and justice, but recognises that human beings have a legal entitlement (a right) to social protection and the enhancement of their lives that is matched by the obligation of public authorities to guarantee this: the right to work, the right to adequate working conditions, the right to job security, the right to food and housing and so on are not an optional but a central component
of a democratic state based on the rule of law. Please see this joint letter "Labour Behind a Food Strategy", Bristol 19/6/2019 signed by IFAN.  

16. What regulatory measures could reduce economic volatility and provide long-term security in the farming and fishing sectors, and for food producers and their employees?

Please see chapters 5 and 8 of the People’s Food Policy for detailed proposals in this area.

17. What workforce does a thriving and sustainable food industry require?

A thriving and sustainable food system requires more than a skilled workforce that knows how to use technology. It is about: an integrated approach and greater coordination within the food system; attention to the bottlenecks; a broad notion of food workers; intersectionality; transparency and visibility; protection, respect and fulfilment of the workers’ human and labour rights; access to justice and reliable enforcement; and fair access and use of technological innovation. Please see the joint letter "Labour Behind a Food Strategy", Bristol 19/6/2019.

18. What measures could deliver the necessary knowledge and skills base in the food industry, and what might encourage new entrants, apprentices or trainees?

It is vital to open government-funded agricultural colleges, agricultural extension centres, farmer-to-farmer knowledge exchange schemes and hospitality academies throughout the country. It is also important to make food education compulsory in the national curriculum at both primary and secondary levels and to offer more funded vocational food production courses and apprenticeship schemes for young adults which will provide a base set of knowledge and skills.

19. What steps could be taken to encourage faster or better take up of different, newer emergent technologies in our food production and distribution industries?

Information, education and training, grants to facilitate access to new technologies and financial incentives. Technology and innovation must be clearly defined to include low impact technologies and social innovation, such as agroecology.

Please see chapter 7 of the People’s Food Policy for detailed proposals in this area.

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8 https://docs.google.com/document/d/1mkaWpl7uz_KKVlRXT-6yBEavhmmHpmApXwfJ4D_K20I/edit?usp=sharing
9 https://drive.google.com/file/d/0BByOC-u0IVRMGLUVKem12RHNhMU0/view
10 https://drive.google.com/file/d/0BByOC-u0IVRMGLUVKem12RHNhMU0/view