

**Good Food for Our Money Campaign response to Defra's consultation on the Impact Assessment for 'Government Buying Standards' specifications for food and food services
24 January 2011**

About the Good Food for Our Money Campaign

The *Good Food for Our Money Campaign* is run by *Sustain: the alliance for better food and farming* which advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. Sustain represents around 100 national public interest organisations working at international, national, regional and local level.

The Good Food for Our Money Campaign represents a growing coalition of organisations calling for mandatory health, animal welfare, ethical and sustainability standards for all public sector food. The campaign is already supported by 57 national organisations (www.sustainweb.org/goodfoodforourmoney). A draft of this response has been circulated to all supporting organisations for their comment.

SUMMARY

Thank you for the invitation to comment on the publication of the Impact Assessment for Government Buying Standards (GBS) which is now the subject of external review. The response below is split into six sections:

1. System of implementation and enforcement
2. Costs and market capacity
3. Sustainable and healthy public sector food procurement: essential characteristics
4. Specific comments on GBS
5. Comments on GBS nutrient and health based criteria
6. Comments on GBS potential "best practice" level

In these sections we present major concerns about the current draft of GBS. Our major criticisms are that the proposed standards:

- fail to clarify how standards will be implemented and enforced
- do not contain definitions of 'sustainability' or 'sustainable' that are clear, detailed, meaningful (and relevant to individual food categories) and do not link standards to clearly defined health and sustainability objectives
- either do not exceed minimum legal requirements, or are not ambitious or progressive
- do not have criteria for which credible and transparent reasons have been presented
- contain criteria for nutrients which are not based on a transparent, effective, evidence-based model which covers all food categories and all the most important nutrients/food components relevant to healthy diets
- do not require the labelling of foods with calorie, saturated fat, salt and allergen contents at an entry level
- need to incorporate and be supported by training and appropriate communications
- will not be mandatory across the public sector, nor sufficiently take into account the diverse needs of specific population groups across individual meals and menus

We explain the reasons for these substantial criticisms below and request that the Government addresses these concerns in the final publication of GBS prior to implementation in March 2011.

1. SYSTEM OF IMPLEMENTATION AND ENFORCEMENT

Enforcement

Government Buying Standards will be reviewed in three and five years to "establish its impact and the extent to which the policy objectives have been achieved" (page 2).

The consultation document does not explain how GBS will be reviewed. This is absolutely essential because government departments and public bodies affected by GBS will be responsible for self-managing the implementation of food standards. Under the current proposals there is no clear mechanism for monitoring whether, or how, departments are progressing beyond compliance of GBS. Neither is there any requirement for departments to publish any independent verification of having met the standards, or a clear procedure should any public institution fail to meet the standards included in GBS.

Any review of GBS must take into account whether the standards have delivered against a set of key criteria. This should include how far they have delivered in improving health, raising standards of animal welfare and reducing greenhouse gas emissions caused by the production of food throughout its life cycle – from farm to mouth. It is essential that this criteria is published alongside GBS so that it is possible to link each standard to wider health or sustainability objectives. For example, clarifying where GBS will act to tackle climate change would clearly demonstrate the environmental benefits of buying sustainable food, which can then be replicated by consumers outside the public sector.

GBS afford a good opportunity to compare the effectiveness of mandatory food standards for central government with the uptake of the standards on a voluntary basis for the rest of the public sector. This requires that progress is monitored closely and results are published regularly. For this reason, GBS should be reviewed within a year of being introduced. Waiting for three years to carry out a first review of GBS will act as a disincentive to public bodies to meet the standards quickly and to make further progress beyond meeting the minimum standards included in GBS.

We are very concerned that, where they are mandatory, the adoption of the standards will rely on enforcement by the public institutions themselves. Such self-regulatory approaches have routinely failed in the past. For example, the official evaluation of Defra's 'Public Sector Food Procurement (PSFPI) by Deloitte¹, stated that take-up of PSFPI standards had not been widespread because there was no "binding regulatory framework" to enforce them. Similarly, the "Yet More Hospital Food Failure" report, published by the Good Food for Our Money Campaign in March 2010, found that government had spent more than £54 million on failed voluntary attempts to improve hospital food in the previous ten years. There is a clear danger that GBS will be slow to achieve, and to spread, because they will rely on individual public bodies to implement, monitor and enforce them openly and consistently over time.

It is concerning that the consultation document states that PSFPI standards have been in place for central government departments since 2003, and that this would make GBS easier for those central government bodies to achieve. As described above, there has actually been a failure of public sector institutions to meet PSFPI standards, and for these standards to then spread over time. Rather than demonstrating success, this clearly shows that a self-regulatory approach to improving food standards in the public sector does not work.

In many cases, the standards set out in GBS are not difficult to achieve and simply reflect current levels of compliance in the public sector. There is therefore no need to wait for three years to carry out a review of Government Buying Standards, when they largely reflect current practice.

To ensure that GBS is implemented, monitored and reviewed effectively, we recommend that three changes are made to the current proposals. These are that:

1. public institutions affected by GBS must be required to publish verification of meeting GBS, as well as any further progress achieved.
2. GBS are reviewed after the first year of implementation, instead of after three and five years as specified in the consultation document. This will act as an incentive to public institutions to meet the standards quickly and will inspire further progress within a shorter timeframe.
3. GBS clearly define what action will be taken if central government public bodies fail to meet the mandatory standards required of them.

¹ Public Sector Food Procurement Initiative – An Evaluation, March 2008, <http://www.defra.gov.uk/foodfarm/policy/publicsectorfood/documents/090311-PSFPI-%20evaluation.pdf>

Aspiration vs. current compliance

The criteria included in GBS have clearly been set to reflect the 'market average level' in the public sector. This lack of ambition is very disappointing and undermines one of the most important objectives of the standards – to “lead by example by raising baseline levels of compliance with sustainability and nutritional standards” (page 1).

We request that GBS are re-assessed so that the 'market average level' also considers performance in the retail market. This is essential if GBS are to lead by example. The current standards, for example, stipulate that 100% of eggs must be from 'enriched cages' or from production systems of higher animal welfare standard e.g. free range eggs. In the retail market, however, approximately 60% of eggs purchased are free range. This highlights the big difference in the market averages between the public sector and private retail sectors - at the present time, standards in the public sector lag behind those in the retail sector. If public sector food is to lead by example to change consumption behaviour it must at the very least match current performance in the retail sector.

In addition, because the standards have been designed to meet the 'market average' in the public sector, they largely reflect current compliance and will fail to inspire better performance by public institutions. It is simply not possible for GBS to reflect current performance and, at the same time, lead by example to create demand for healthy and sustainable food and inspire a change in consumer behaviour.

The rest of the public sector

The consultation document states that the introduction of mandatory food standards in central government:

“can help build sustainable economies for marginalised and disadvantaged producers in the developing world” by mandating that tea and coffee meet fairly traded accreditation (page 19).

will address “overfishing (which) is a threat to marine wildlife and habitats. Some fish stocks are widely reported to be in state of serious decline.... In the North Sea, many once common species, such as cod, skate and plaice are on the verge of commercial collapse” (page 55).

will contribute to policy targets on climate change by supporting those producers that have taken steps to improve the environmental stewardship of their land (page 57).

will address government concern about the “use [of] taxpayers' money to buy food produced to standards lower than those to which UK producers are obliged to produce” (page 18)

Whilst these are laudable aims which could be achieved with sufficiently strong standards, GBS will only apply on a mandatory basis to a third of the food purchased by the public sector. For two thirds of the public sector, including hospitals, the food served will not have to adhere to any GBS and will therefore fail to meet the commitments set out above. In order to ensure these commitments are achieved, food purchased in all areas of the public sector with taxpayers' money must be required to meet the same standards as food purchased in central government. This is particularly important when you consider that GBS has the potential to invest taxpayers' money in delivering key Government policy pledges. For example, purchasing Fairtrade products contributes to the Government's development priorities, specifically on the Millennium Development Goals and the development of enterprise in developing countries.²

As the Impact Assessment consultation document has committed to the above statements, there can be no rationale for setting only a 50% target for fairly traded tea and coffee and a 60% target for sustainable seafood. It cannot be acceptable for GBS to sanction half of tea and coffee purchases in

² The Coalition Agreement: p.22 http://www.cabinetoffice.gov.uk/media/409088/pfg_coalition.pdf

central government to be from producers employing unethical practises in poor countries and for 40% of seafood to be from endangered species.

2. COSTS AND MARKET CAPACITY

As set out in the previous section, by setting procurement standards for all food items government can stimulate demand and lead by example. Arguing that the market could not meet the additional demands of the public sector is not valid: meeting demand is what markets do. A good example is provided by the retail sector, which has committed to meeting the FSA 2012 salt targets. Moreover, it is not correct to assume that increased demand, met by new supply, will inevitably lead to increased cost. There are numerous examples where working with suppliers in the commercial sector has not led to such an increase, for instance for Fairtrade bananas, Freedom Food meat and Marine Stewardship Council fish. Often, market expansion to meet increased demand for more sustainable foods reduces costs through economies of scale. For example, the Royal Brompton Hospital saved 2% on its expenditure on vegetables after committing to buy only UK seasonal vegetables in collaboration with other local public organisations. The Royal Brompton estimates that, if all hospitals in the NHS bought collaboratively to this standard, the NHS could save at least £180, 000 a year.

A number of individual public institutions have been buying healthy and sustainable food over a number of years, without increases in overall costs. Commercial caterers, like Compass, have publicly argued that mandatory standards would simplify the procurement process and bring down costs which can then be passed on to customers in the public sector.³ Good examples of cost reductions from sustainable food procurement include:

- A Government commissioned report into Defra's 'Public Sector Food Procurement Initiative' (PSFPI) which concluded that costs decreased when there was an increase in the procurement of UK, regional, seasonal, farm-assured and small/local supplier produce (60% of those surveyed reported cost decreases or no impact on food costs).⁴
- Nottingham University Hospitals NHS Trust saves £20,000 per annum by buying local fruit and vegetables.⁵
- 71% of 'Food for Life Catering Mark criteria' public sector institutions reported that the implementation of Food for Life sustainability criteria was cost neutral and 29% reported overall cost savings.⁶
- Compassion in World Farming case studies with local councils have shown cost savings by moving to free-range eggs which are supplied by local farmers, with Hampshire, for example, seeing a 20% drop in costs.⁷

Sustain's extensive experience of working with public sector organisations to encourage the procurement of healthier and more sustainable food, shows that good practice is slow to spread. As beacons of good practice, excellent examples such as the ones above also illustrate how poorly the rest of the public sector is performing without mandatory legislation.

In addition, and in the long-term, buying better public sector food would significantly reduce costs caused by unhealthy food by tackling diet-related ill health which costs the NHS £6 billion every year⁸. There are also potential long-term savings from reduced environmental damage, lower risk of animal diseases, and local economic development, particularly in rural areas which the Impact Assessment document recognises.

³ See transcription of discussion with Compass in May 2009 minutes of the UK's Council of Food Policy Advisors: <http://www.defra.gov.uk/foodrin/policy/council/pdf/cfpa-090512-note.pdf>

⁴ <http://www.defra.gov.uk/foodfarm/policy/publicsectorfood/documents/090311-PSFPI-%20evaluation.pdf>, p.29

⁵ <http://www.defra.gov.uk/foodfarm/policy/publicsectorfood/documents/090311-PSFPI-%20evaluation.pdf>, p.29

⁶ <http://www.soilassociation.org/cateringmark.aspx>

⁷ http://www3.hants.gov.uk/7.3_local_egg_partnership_-_jun_09.doc

⁸ Food Matters: Towards a Strategy for the 21st Century, Cabinet Office, 2008

<http://www.ifr.ac.uk/waste/Reports/food%20matters.%20Towards%20a%20Strategy%20for%20the%2021st%20Century.pdf>

Inaccuracies in cost assumptions

We have a number of concerns about the cost assumptions that have been used in the Impact Assessment. We outline two areas of concern below for which we have clear evidence of inaccuracy.

(i) Fairly traded tea and coffee: “15% price premium for fairly traded tea and coffee” (page 49)

In the retail sector, the Fairtrade Foundation calculates that the estimated cost of complying with Fairtrade standard adds between 1.9 to 2.4% to the cost of tea and coffee that is not fairly traded.

The sales volumes of the main Fairtrade categories are significant enough to ensure the competitiveness of the markets, which in turn keeps prices competitive. In the UK, retail sales of Fairtrade produce amounted to £799m in 2009, of which £157m was coffee and £68m was tea.⁹ There is also a well established and competitive network of nationwide Fairtrade wholesalers.¹⁰

For these reasons, we find no justification for the 15% price premium allocated to fairly trade tea and coffee in the Impact Assessment for Government Buying Standards. GBS can further reduce the 1.68-2.8% price premium outlined above if 100% of tea and coffee is required to have been fairly traded rather than the current 50% and by making full use of its ability to negotiate on price.

(ii) Sustainable seafood: “5% price premia for sustainably-sourced fish products” (page 36)

GBS assumes a price premium of 5% for purchasing sustainable seafood. While it is difficult to put an accurate figure on a price premium associated with MSC fish, the MSC advises that the differential is actually much lower than is suggested by Defra.

For a caterer, it is likely that they can switch to MSC products without a detectable price increase, thanks to the availability and price of the fish products they are likely to use. For Salmon, for example, the price for MSC certified Wild Alaskan Salmon compares very favourably with farmed Scottish Salmon (one wholesaler supplies MSC for £4.55 each versus £6.25 for non-MSC farmed)¹¹. In addition, there are large volumes of MSC certified white fish species including pollock, hake, hoki and coley available to the UK catering market, These are often the least expensive whitefish options which are readily available, and would represent a cost saving compared to more popular whitefish species such as cod or haddock.

For example: Price per 140 – 170g fillet of

Cod	= £2.03 each
Haddock	= £1.78 each
MSC Hake	= £1.69
MSC Alaskan Pollack	= £1.55 ¹²

For oily fish, there is also a high volume of certified supply into the UK, and evidence from the retail sector would suggest that MSC mackerel and sardine products are not more expensive to consumers than their non-MSC counterparts.

Looking to the future, there is every chance that any price premium applied to MSC fish will diminish, as more and more fisheries are certified and the volume of MSC fish available increases. This will be particularly the case if the government commits to MSC fish in the GBS; more companies will start to offer MSC fish, with more products, which stands to increase competition and reduce prices overall.

Wider benefits which have not been costed

The consultation document clearly identifies that there are wider financial benefits achieved by the introduction of GBS which have not been quantified. By accepting that this is the case, we can be confident that there will be a net cost benefit achieved by introducing GBS. For example, the document states that including an environmental stewardship standard is an effective way of

⁹ http://www.fairtrade.org.uk/what_is_fairtrade/facts_and_figures.aspx

¹⁰ http://www.fairtrade.org.uk/includes/documents/cm_docs/2010/n/nd.pdf

¹¹ Information from Brakes' product listing, correct Autumn/Winter 2010

¹² Information from Brakes' product listing, correct Autumn/Winter 2010

supporting British farmers who have integrated environmental practises in their farming. By doing this, the standards will increase public investment in local economies and help to tackle unemployment in rural areas, and at the same time help to reduce the costs incurred by climate change. The standards also achieve both of these benefits by requiring the purchase of a minimum amount of organic food which uses a production system that requires more employees, and also emits less greenhouse gas emissions because the food is grown without artificial fertilisers. The lack of quantification of these cost benefits represents a major gap in the Impact Assessment.

2. SUSTAINABLE AND HEALTHY PUBLIC SECTOR FOOD PROCUREMENT: ESSENTIAL ELEMENTS

Mandatory standards needed for the whole public sector

The public sector accounts for around one third of all meals eaten outside the home (education, healthcare and services together account for 29% of meals served outside the home).¹³ Hence, healthy public sector meals would make a significant contribution to a healthier nation – arguably for consumer groups that most need such nutritional support – such as children and pre-school children in state-run nurseries, hospital patients, elderly care home residents and low-paid healthcare workers.

In order to provide the necessary impetus to improve public sector performance, nutrition and sustainability standards need to be mandatory for the whole public sector, not just for central Government departments. This would embed health and sustainability into everyday purchasing decisions and catering practices, build commercial confidence in new green supply chains, and help caterers achieve the necessary efficiencies of scale¹⁴ to meet public policy goals.

Diverse customer groups have diverse needs

Many specific population groups, particularly the very young and very old, have specific nutritional needs and specific nutritional criteria should be developed to allow the food standards to be relevant to them. As an example, the nutritional balance of meals appropriate to care homes for older people undergoing medical treatment is different from that applicable to staff canteens. The specific nutritional and cultural needs of diverse customer groups should be built in at all levels in a clear progression towards required good practice. The specialist nutrition charity Caroline Walker Trust provides nutrition guidance for different needs and age groups.¹⁵

Training has to be built in

Our experience of working with public sector caterers indicates that training of management, procurement, catering and front-of-house staff is essential to achieve the necessary changes to procurement and catering practice to achieve healthier and more sustainable food. This comes with one caveat, that more work is needed to ensure that training is designed specifically to meet these needs. This could benefit greatly from government leadership.

Promotion and communication has to be integrated

Enthusiastic uptake of healthier and sustainable food by staff and customers is unlikely to be achieved without promotion and communication being integrated throughout the process. For healthy

¹³ Cabinet Office, Food: an analysis of the issues. The Strategy Unit, January 2008 (Updated August 2008): http://www.cabinetoffice.gov.uk/media/cabinetoffice/strategy/assets/food/food_analysis.pdf

¹⁴ Mandatory standards are supported, for example, by the large-scale foodservice company Compass Group. In minutes of the UK's Council of Food Policy Advisors (May 2009), a discussion with Compass is reported as follows: "To see change, procurers need to be mandated to adhere to national standards. Change will require clear mandatory standards, and this will ultimately bring price down through economies of scale. While the approach to procurement remains voluntary change will not be made as buyers will focus on the impact on the bottom line. There needs to be a common set of standards, which include nutrition, local and sustainability. Due to an inconsistent approach in the public sector, the changes that have been made in private sector contracts by the big eight services providers towards higher nutritional standards are not consistently reflected in public sector contracts." See: <http://www.defra.gov.uk/foodrin/policy/council/pdf/cfpa-090512-note.pdf>

¹⁵ The Caroline Walker Trust's publications can be seen at: <http://www.cwt.org.uk/publications.html>

and sustainable food to be a success, the involvement of staff and customers at all levels is required – from management and procurement, through to catering, front-of-house service, care staff and waste. Participating institutions should show how they are engaging staff and customers in communicating about food quality, nutrition, provenance, ethical criteria and the benefits of better catering practices. As an example of good promotion and communication practice, Food for Life Partnership schools have achieved an average 16% increase in school meal take up which is more than eight times the national average.¹⁶

Monitoring success

We note that that the 50% target for sustainable seafood included in GBS at the Informal Consultation stage has been revised to 60% in the Impact Assessment after it was reported that government departments were already meeting this target. This demonstrates the importance of external assessment to make sure monitoring and reporting by individual government departments and public bodies is accurate.

We also note from a recent Deloitte report, commissioned by Defra to evaluate self-monitoring by caterers of the Healthier Food Mark, demonstrated that caterers could not show how they were meeting the standards.¹⁷

The absence of any system of monitoring or inspection removes any compulsion on government departments to investigate their procurement practice thoroughly and present performance accurately.

Meal deal

There is no accompanying guidance or literature to explain what constitutes a ‘meal deal’. We would welcome further information about this, referencing what a meal deal is, where they are served and to whom.

3. SPECIFIC COMMENTS ON THE DRAFT GBS

Eggs

100% “eggs sourced from systems that do not use conventional cages. If from a caged system, enriched cages are used” (page 1, Annex B, list of criteria in the GBS Impact Assessment)

The stated criteria do not go beyond the minimum legal EU standard from 2012 which will ban the production of conventional battery eggs. The welfare of laying hens in enriched systems is still compromised. Hens in enriched cages are unable to stretch their wings and are still not fully free to dust bathe, peck or lay eggs in a natural way. A barn or free-range system is the only way to ensure hens can fully express their natural behaviour. If the criteria merely point to legal obligations, we consider they would have little, if any, value.

Cage-free egg production is now widely accepted and supported by both consumers and retailers.¹⁸ We therefore strongly recommend that GBS:

- support higher welfare options which do not rely on cage systems, such as free-range and organic
- are applicable not just to eggs in shell, but also where eggs are used as an ingredient
- are applicable to imported eggs and egg-containing products from outside of the EU

¹⁶ <http://www.foodforlife.org.uk/Whatshappening/Newsandupdates/Newsitem/tabid/117/ArticleId/303/Food-for-Life-Partnership-schools-see-school-meal-take-up-increase-by-16.aspx>

¹⁷ http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@dh/@en/@ps/documents/digitalasset/dh_119610.pdf

¹⁸ Over a quarter of UK councils are now buying cage-free eggs.

63% of people in the UK would prefer their local council to use eggs from cage-free hens (YouGov June 2010). Sainsbury’s, The Cooperative Food, M&S and Waitrose sell only cage-free eggs. Morrisons sells only cage-free eggs under its own label. Tesco encourages customers to trade up to barn, free-range or organic eggs.

We support Compassion In World Farming's recommendation that GBS introduce a phased switch to 100% cage-free eggs over a period of two years, with an immediate policy to ensure any cage eggs come from enriched systems during the phase out period.

Seafood produce

Preferred option of 60% "fish products from sustainable sources" rising to 100% for enhanced option (page 1, Annex B, list of criteria in the GBS Impact Assessment)

We would not support anything less than a '100% demonstrably sustainable' commitment to the supply of fish and seafood products. This is the mandatory commitment in the London 2012 Food Vision for the Olympic and Paralympic Games, drawn up with the support and input of over 50 leading industry, regulatory, government and conservation organisations. There is in our opinion no justification for 40% of fish bought by government to be 'unsustainable'.¹⁹

The Impact Assessment consultation document states that GBS will address 'market failures', caused when food purchased does not incorporate the full cost of 'negative' and 'positive' externalities e.g. taking into consideration harm to the environment or, conversely, the positive implications of buying sustainable food.

Although we welcome the consideration of these externalities, the consultation document does not address the market failures associated with unsustainable seafood. These market failures are not limited to the continued degradation of the marine environment from unsustainable fishing, but also the destruction of a productive food resource and an economic livelihood for thousands of UK fishers.

By requiring that only 60% of seafood has to be sustainable, the remainder of this seafood can be purchased without any consideration of the sustainability of stocks or exposure of species to over-fishing. To address this alarming and obvious market failure, we strongly recommend that 100% of seafood must be sourced from sustainable stocks. This would, for instance, be achieved by adherence to the procurement guidelines adopted by the London 2012 Food Vision for the Olympic and Paralympic Games (see below).

It is not possible for us to endorse a standard for sustainable fish without seeing the detail of the criteria which has not been included in the Impact Assessment consultation document. If, as per the Healthier Food Mark, an approach is taken that is too weak then global fish stocks, which Defra acknowledges as a 'red risk' for global food security²⁰, will not be protected.

The definition of 'sustainable' is crucial. We are concerned that in the past, Defra and monitoring undertaken by the Public Sector Food Procurement Initiative have unhelpfully conflated the term 'sustainable' with the term 'managed' for fish stocks, meaning that many unsustainable practices are still supported. Some 'management' systems for seafood do not take into account crucial aspects of sustainability. The London 2012 'demonstrably sustainable' approach for seafood is as follows:

- Exclude the worst: IUCN red list and MCS 'fish to avoid'
- Promote the best: MSC or equivalent and MCS 'fish to eat'
- Improve the rest: have a buying policy for all other fish that addresses sustainability issues and supports engagement with e.g. fishery management programmes.

In lay terms, this means excluding fish species identified as most at risk by the Marine Conservation Society, and only choosing fish from proven sustainable sources, such as those accredited by the Marine Stewardship Council.

We recommend that all farmed fish must be from systems that address welfare and sustainability concerns, such as RSPCA Freedom Food and organic farms, and that the Aquaculture Stewardship Council certification for farmed seafood is used when it becomes available.

¹⁹ Unsustainable fisheries can become sustainable through participation with the Marine Stewardship Council. In the US, Sodexo has announced all wild caught fish bought by them will be MSC by 2015: <http://www.sodexousa.com/us/en/newsroom/press/press09/sustainableseafood.asp>

²⁰ Defra's Food Security scorecard is currently in development. Explanatory notes are available at: <http://www.defra.gov.uk/foodrin/policy/pdf/fs-indicators-080912.pdf>

Environmental standards for meat, milk and vegetables

100 % meat and meat products farm assured as a welfare minimum (page 1, Annex B, list of criteria in the GBS Impact Assessment)

100% milk and dairy products farm assured or equivalent (page 1, Annex B, list of criteria in the GBS Impact Assessment)

100% vegetables farm assured or equivalent (page 1, Annex B, list of criteria in the GBS Impact Assessment)

At least 10% primary commodity (i.e. raw ingredient) food is produced to certified or assured higher level environmental standards (organic, LEAF rising to 20% under enhanced option (page 2, Annex B, list of criteria in the GBS Impact Assessment)

Farm assurance is useful to check that food produced is safe and traceable, and meets UK national standards for basic animal welfare and environmental protection. However, farm assurance does not indicate that farmers are adopting higher standards of animal welfare, nor that measures have been taken on-farm to protect the environment; sequester carbon; conserve soil, energy and water; minimise agricultural chemical use; or promote biodiversity. Half of the greenhouse gas emissions from the food system are pre-farmgate. We see little in this standard to give an incentive to farmers adopting on-farm environmental measures, and doing so in a demonstrable way to help caterers identify and promote more sustainable produce.

For example, from an animal welfare perspective, farm assurance does not provide enrichment materials to enable pigs to engage in their natural rooting and manipulating behaviours which often results in pigs being tail docked²¹. This is because, in these conditions, pigs are unable to perform key natural behaviours which in turn leads farmers to routinely tail dock fattening pigs. A European Food Safety Authority (EFSA) figures show that 81% of UK pigs are tail docked²².

It is positive that Defra has included a percentage target for the use of food from farming produced to higher environmental standards. However, 10% (rising to 20% over time) is a pitifully low target, given farming's enormous impact on the environment. Substantially higher percentage targets for food with environmental standards are needed. These could also include Entry Level Stewardship (ELS), Higher Level Stewardship (HLS), Rainforest Alliance and Organic. ELS would be backed by government policy as it is a Common Agricultural Policy (CAP) scheme to promote environmental protection and conservation management.

We are concerned that the standards state that LEAF Marque and organic accreditation should be treated as equivalent. However, these standards are very different, and do not provide equivalent benefits. Organic certification means that farmers are producing food without any use of artificial fertilisers or pesticides. This provides a very large environmental benefit because the use of artificial chemicals in farming contributes significantly to greenhouse gas emissions caused by the food system.

LEAF Marque accreditation demonstrates where farmers have taken action to integrate responsible environmental practice in the management of their farms, for example, through the responsible use of water and fuel, and taking steps to improve the wildlife and landscape of the land used for production. Unlike organic certification, however, LEAF Marque does allow for the use of pesticides. LEAF accredited farmers might be certified organic, but this does not have to be the case.

We recommend that both Leaf Marque and organic accreditation continue to be specified in GBS. However, they must be included as separate criteria and should not be treated as equivalent. In addition, a higher percentage of food must be required to meet both methods of certification as set out above.

It is also worth noting that there are additional ways that catering standards can address environmental concerns and health goals. One of the most effective way to achieve environmental

²¹ Scientific Opinion of the Panel on Animal Health and Welfare on a request from the Commission on Animal health and welfare in fattening pigs in relation to housing and husbandry. *The EFSA Journal* (2007) 564, 1-14

²² Scientific Report of the Panel on Animal Health and Welfare on a request from Commission on the risks associated with tail biting in pigs and possible means to reduce the need for tail docking considering the different housing and husbandry systems. *The EFSA Journal* (2007) 611, 1-98

and health improvements in public sector food is by increasing the proportion of food of plant origin that is bought, prepared and served (in particular fruit, vegetables and wholegrain foods); and decreasing the proportion of food of animal origin (in particular processed meat, and high fat dairy products) that are bought, prepared and served – and ensuring that the livestock produce that is used is high quality. By ‘high quality’ we mean from production systems that guarantee high environmental protection and higher standards of animal welfare, such as organic, free range and the RSPCA’s Freedom Food accreditation.

Livestock production is responsible for between 18% and 30% of global greenhouse gas emissions (the higher figure being a recent estimate by WWF-UK and the Food Climate Research Network, when land-use change for agriculture is taken into account). On the health aspects of livestock consumption, the World Cancer Research Fund has recently undertaken a systematic review of scientific evidence of the links between lifestyle factors and cancer. They concluded that “The evidence that red meat is a cause of bowel cancer is convincing and there is also convincing evidence that processed meat is a cause of bowel cancer.” They recommend that “To reduce your cancer risk, eat no more than 500g (cooked weight) per week of red meats, like beef, pork and lamb, and avoid processed meats such as ham, bacon, salami, hot dogs and some sausages.”²³

GBS should be designed in line with these insights. We cannot see in the standards any proposal to reduce meat procurement, preparation and consumption. For many of the pioneer public sector caterers working to improve the health and sustainability of their food, limiting the overall use of livestock products, and using less-favoured cuts to maximise the efficiency of carcass use – have been keys way in which to address health and sustainability concerns, whilst also controlling costs, as meat is usually one of the most expensive ingredients on the menu.

We also note with concern that, given current compliance with farm assured standards by dairy farmers in the UK, the proposed ‘preferred’ option will not encourage progress in improving standards of animal welfare and is therefore a ‘do nothing’ proposal. For the Government to truly address sustainability concerns we recommend that GBS set a percentage of milk and dairy products procured from higher welfare systems at both the ‘preferred’ and the ‘enhanced option’. In practice this would mean specifying milk and dairy products that are produced on farms that provide adequate grazing access (Compassion in World Farming advises at least one hundred days per annum) and incentives designed to foster good welfare e.g. access to pasture and limitation of transport time (as above, CIWF advises a maximum of eight hours from loading to unloading).

Fair trading

*At least 50% of tea and coffee is certified to be fairly traded
Rising to all tea and coffee is certified to be fairly traded” under enhanced option (page 2, Annex B, list of criteria in the GBS Impact Assessment)*

Fairtrade certification is well established, respected and very widely recognised and supported by the public.²⁴ For this reason, we believe that criteria from the most basic level upwards should require that **all** tea, coffee, sugar and bananas are certified Fairtrade. This is simple and cost-effective to achieve. The size of the market of Fairtrade bananas is £202m and £44m for cocoa which is larger, or roughly equal, to the markets for tea and coffee. This means that both products are competitively priced and are sufficiently available to meet the requirements of GBS.

We also request that GBS should require that all international suppliers should meet Ethical Trade Initiative (ETI) and International Labour Organisation (ILO) standards. This is already considered to be good practice for major purchasing bodies supplying the public sector, such as the Purchasing and Supply Agency (PASA).²⁵ There is, unfortunately, a proliferation of industry-led alternatives that purport to be ‘ethical’ but may go little further than bare minimum legal standards on, for example, working conditions and freedom of workers to organise. GBS criteria should be clear about what should be permissible in terms of any “equivalence” claims, which we suggest should be linked to the work of the Ethical Trade Initiative (ETI) and the International Labour Organisation (ILO) and open to

²³ See the WCRF website and guidance at: http://www.wcrf-uk.org/research/types_of_cancer.php

²⁴ Fairtrade Foundation (June 2009) Global Fairtrade sales increase by 22%, see: http://www.fairtrade.org.uk/press_office/press_releases_and_statements/jun_2009/global_fairtrade_sales_increase_by_22.aspx

²⁵ NHS Purchasing & Supply Agency (PASA) (2008) Ethical Procurement for Health Guidance

their scrutiny and comment. GBS must not give unfair competitive advantage to bidders that do not meet this compliance. Such an approach has the potential to drive down standards and spark a 'race to the bottom' amongst suppliers.

To support all food producers and suppliers, whether based in the UK or not, the public sector should also commit to fair trading throughout. This would include addressing at all levels issues such as fair terms of business, no undue delays in payment (i.e. adoption of the Prompt Payment Code) and appropriate dispute resolution procedures.

Seasonal food

Fresh produce that is outdoor grown or produced during the natural growing or production period for the country or region where it is produced. It need not necessarily be grown or produced locally to where it is consumed and this applies to seasonal food from both the UK and overseas (page 1, Annex B, list of criteria in the GBS Impact Assessment).

We welcome the recognition of the importance of seasonal food in the draft GBS criteria but we propose that a requirement to include some seasonal produce on public sector menus should feature at every level of the criteria. This is important as it will demonstrate the many benefits of seasonal produce. It is typically fresher, of better quality, may require less transportation and post-harvest treatments, and is often associated with lower levels of greenhouse gas emissions (particularly in the case of field-grown indigenous fruits and vegetables). In many cases, seasonal food will also be cheaper.

However, we are alarmed that the definition of 'seasonal' includes food from anywhere in the world as long as it is grown outdoors during a natural growing or production period.²⁶ To be meaningful from a sustainability standpoint, 'seasonal' food must have a link to the locality where it is both grown and then consumed. To praise the procurement of seasonal foods from anywhere in the world simply misses the point.

To help public sector caterers make clear and confident decisions about buying more sustainable food, we recommend a definition of seasonal food is included within GBS, in line with the government-sponsored Eat Seasonably campaign (coordinated by the National Trust) and the School Food Trust's widely used and very helpful seasonality chart.²⁷

Bottled water

Pre-bottled water (mineral or spring) is not included on the hospitality menu. Tap water is visible and freely available and such provision is promote (page 2, Annex B, list of criteria in the GBS Impact Assessment)

We support the exclusion of pre-bottled water from the hospitality menu. However, we are disappointed that GBS allows for the purchase of bottled water outside of the hospitality menu and strongly recommend that the standards include a complete prohibition of all bottled water in central government. Tap water requires around 300 times less energy than bottled water (for packaging and transport) and does not leave bottles to be disposed of. Only in very exceptional circumstances should bottled water be permissible, for example in certain hospital situations where sterile food and drink is necessary.

Equipment, Recycling facilities, Distribution and delivery packaging, Recycled paper, Food waste collection service

We believe that all public sector food provision should be as environmentally sustainable as possible and welcome the inclusion of these aspects. However, these do not fall within our areas of expertise and therefore we leave others with greater knowledge and experience to comment on these sets of criteria.

²⁶ Terms of reference for research on "Understanding the Environmental Impacts of Consuming Foods that are Produced Locally In Season - FFG 0811", Defra, March 2009.

²⁷ The School Food Trust seasonality chart is downloadable free of charge at: http://www.schoolfoodtrust.org.uk/doc_item.asp?DocCatId=9&DocId=72

4. COMMENTS ON THE DRAFT GBS NUTRIENT AND HEALTH BASED CRITERIA

Whilst we welcome the efforts to reduce unhealthy food components (for instance, saturated fat, sugar and salt) and increase healthier ingredients (for instance fruit), we recommend that the development of GBS learns the lessons from the process to improve school food. This process found that individual recommendations will only have limited impact unless the nutritional quality of the whole meal is tackled. The experience from schools is that, with effort, it is possible to introduce nutrient based standards universally across an entire sector.

Moreover, we have major concerns about the nutrient-based criteria presented in the draft GBS and are disappointed that no clear rationale is presented in the GBS for:

- the selection of nutrients/food components used
- the food categories chosen (see examples of missing categories under each nutrient below)
- why there are no criteria designed to increase the proportion of a wide variety of vegetables in all meals
- some of the maximum levels or reduction targets - some are either missing, or else seem to be randomly allocated and are inconsistent with other existing schemes (for instance the Food Standards Agency traffic light labeling and the School Food Trust school meal standards).
- the percentages of products in particular categories that need to comply with specified level or reduction thresholds appear to be random.

In order to have credibility, the rationale behind nutrient-based criteria must be transparent, evidence-based and rigorously tested. This is, for instance, the case for the FSA/Ofcom nutrient profiling model which is used to determine if foods are healthy enough to be advertised during children's television programming.²⁸

The FSA/Ofcom model measures the healthiness of foods according to seven nutrients (energy, saturated fat, sugar, sodium, fibre, protein and fruit, vegetable and nut content). For any single food the model therefore assesses the balance of each healthy and less healthy component based on the food's overall composition. This provides a scientifically credible approach, whereas the piecemeal single nutrient based approach presented in the draft GBS guidelines is not transparent, it is inconsistent, appears random and is therefore fundamentally flawed.

Salt

To reduce salt intake:

- *Vegetables are cooked without added salt (page 2, Annex B, list of criteria in the GBS Impact Assessment).*
- *At least 50% of procured meat and meat products, breads, breakfast cereals, soups and cooking sauces, ready meals and pre-packed sandwiches (procured by quantity) meet FSA salt targets and all stock preparations are lower salt varieties (i.e. below 0.6g/100mls reconstituted) (page 3, Annex B, list of criteria in the GBS Impact Assessment).*
- *Salt is not available on tables (page 3, Annex B, list of criteria in the GBS Impact Assessment).*

From the Impact Assessment it is not clear on what basis:

- the categories chosen have been selected, for instance, what about the salt content of savoury snacks, pizza, cheese and bakery products including cakes, biscuits and pastries?
- the percentage threshold compliances have been set: we recommend that 100% of the food products listed in the criteria meet specified salt targets, as we can see no reason for this not to be the case.

It is important that the 2012 FSA salt targets are used and this should be clearly specified in GBS. The 2010 FSA salt targets are insufficient to reach the Government's population average daily target

²⁸ <http://www.food.gov.uk/healthiereating/advertisingtochildren/nutlab/>

of a maximum of 6g salt a day. The retail sector has agreed to meet the 2012 FSA salt targets by 2012, so we would therefore expect market capacity to be able to meet this demand by this date.

Saturated Fat

To reduce saturated fat consumption:

- *Meat and meat products, biscuits, cakes and pastries (procured by volume) are lower in saturated fat where available (page 3, Annex B, list of criteria in the GBS Impact Assessment).*
- *At least 50% of hard yellow cheese has a maximum total fat content of 25g/100g; at least 75% of ready meals contain less than 6g saturated fat; per portion; at least 75% of milk is reduced fat; and at least 75% of oils and spreads are based on unsaturated fats (page 3, Annex B, list of criteria in the GBS Impact Assessment).*

From the Impact Assessment, it is not clear on what basis:

- the saturated fat levels have been set: to judge how effective these will be from a health-promotion perspective, we need to know what model and assumptions have been used to generate these figures. For instance, the total fat content quoted is 5g higher than the FSA's red light level of 20g/100g for its traffic light labeling scheme (representing a high proportion of fat); it is not clear where the 6g/meal saturated fat recommendation comes from; the reductions in fat and saturated fat need to be quantified (and stated in absolute terms), as it does not make sense to simply say they should be lower or reduced.
- reduction targets have not been given for meat and meat products, biscuits, cakes and pastries, which are food categories listed in the criteria that should be procured "lower" in saturated fat where available.
- the categories chosen have been selected, for instance, what about saturated fat content in ready meals, ice cream, confectionary, baked and non-baked savoury snacks?
- the percentage threshold compliances have been set: we recommend that 100% of the food products listed in the criteria meet specified saturated fat targets, as we can see no reason for this not to be the case.

Fruit

50% of the volume of desserts available is based on fruit – which can be fresh, canned in fruit juice, dried or frozen (page 2, Annex B, list of criteria in the GBS Impact Assessment).

A portion of fruit is cheaper than a portion of hot or cold dessert (page 3, Annex B, list of criteria in the GBS Impact Assessment).

We welcome these criteria but would like to see higher levels of the standard encourage and promote a greater percentage fruit in desserts.

While we agree that meals should include more fruit and vegetables, and welcome the standard which specifies at least 50% of dessert by volume will be comprised of fruit, it is a matter of concern that this standard does not address the nutritional value of desserts served. Fruit is both popular and nutritious and can be served independently as a dessert, lunch or meal option. Whilst welcoming an increase in the amount of fruit and vegetables served, we do not believe that this has to be delivered by including it in pre-prepared, ready meal or unhealthy meal options.

Benefit of higher consumption of fruit and vegetables

The Impact Assessment quantifies the cost benefit of reductions in salt and saturated fat but does not calculate the cost benefit of increasing consumption of fruit and vegetables. This is concerning because evidence shows that "increasing the consumption of fruits and vegetables to five portions a day is the dietary target likely to offer the most benefit in terms of (preventive ill health) deaths

averted²⁹. It has already been established that, if every individual in the UK met the recommended daily intake of five portions of fruit and vegetables a day, 15,000 lives would be saved every year³⁰.

The World Health Organisation recommends that to prevent chronic ill health, including cardiovascular disease, stroke, diabetes and cancer, we need to reduce the amount of saturated fat, sugar and salt in our diet AND greatly increase our consumption of fruit and vegetables.

Government research estimates that eating at least five portions of fruit and vegetables can reduce the risk of deaths from chronic diseases such as heart disease, stroke, and cancer by up to 20%³¹. As well as protecting health, this measure makes financial sense because the economic burdens of diet-related ill health are vast – perhaps £6 billion in additional NHS costs alone each year³².

If the UK diet matched nutritional guidelines on fruit and vegetable consumption, and saturated fat, added sugar and salt intake, then the Government estimates that 70,000 fewer people would die each year³³.

We are deeply concerned that GBS does not include sufficient minimum requirements for the provision of fruit and vegetables. This could be achieved by requiring that every main meal served in central government, including meal deals, has to include at least two portions of vegetables and one portion of fruit.

Sugar in breakfast cereals

At least 50% A percentage of breakfast cereals (procured by volume) are higher in fibre (i.e. more than 6g/100g) and do not exceed 12.5g/100g added sugars (page 4, Annex B, list of criteria in the GBS Impact Assessment).

It is not clear on what basis:

- this sugar level has been set: to judge how effective these will be from a health-promotion perspective, we need to know what model and assumptions have been used to generate the figure. This example illustrates why a transparent and credible nutrient profiling model should be used, for instance, a cereal can only be judged as healthy if a wide range of nutrients are taken into account. The FSA/Ofcom model is based on seven nutrients and is a scientifically based method for characterising the healthiness of foods, including breakfast cereals.
- the only food category chosen for sugar is breakfast cereals: what about the sugar content in jam, sweetened drinks, cakes, pastries, ice cream, sweets, biscuits, confectionery and chocolate?
- the percentage threshold compliance has been set: we recommend that 100% of the food products listed in the criteria meet specified sugar target, as we can see no reason for this not to be the case.

Meal deals

Meal deals include a starchy carbohydrate, vegetables and 1 portion of fruit (page 4, Annex B, list of criteria in the GBS Impact Assessment).

From the Impact Assessment, it is not clear:

- what is meant by a 'meal deal'
- why vegetables are not a requirement for inclusion in all meals

²⁹ Scarborough P, Nnoaham KE, Clarke D, et al., 'Modelling the impact of a healthy diet on cardiovascular disease and cancer mortality', J Epidemiol Community Health (2010)

³⁰ Scarborough P, Nnoaham KE, Clarke D, et al., 'Modelling the impact of a healthy diet on cardiovascular disease and cancer mortality', J Epidemiol Community Health (2010)

³¹ Department of Health, 'Choosing a Better Diet: A food and health action plan', 2005

³² Rayner M, Scarborough P, 'The burden of food-related ill health in the UK', Journal of Epidemiology and Community Health 2005; 59: 1054-1057

³³ Cabinet Office, Strategy Unit, 'Food Matters: Towards a strategy for the 21st Century', 2008

- why a wide variety of vegetables are not included (not just the starchy, carbohydrate varieties) for instance health-promoting colourful vegetables such as broccoli, carrots and cabbage³⁴

Snacks, confectionary and drinks

Non-baked savoury snacks are only available in packet sizes of 35g or less (page 4, Annex B, list of criteria in the GBS Impact Assessment).

Confectionery and packet sweet snacks are in the smallest standard single serve portion size available within the market (page 4, Annex B, list of criteria in the GBS Impact Assessment).

All sugar containing drinks are available in no more than a 330ml portion size (excluding hot drinks) (page 4, Annex B, list of criteria in the GBS Impact Assessment).

The success of GBS should be based on assessments of whether the implementation of the criteria has resulted in increased consumption of healthier food, not simply whether healthier options were presented; on an assessment of the nutritional composition of all food served; and include all food provided in an institution, such as vending machines, as well as snacks and meals.

We therefore recommend that GBS criteria limit the availability of non-baked savoury snacks, confectionery and packet sweets and sugar containing drinks, as well as limiting their portion sizes. This approach now exists in schools which, following the introduction of mandatory school food guidelines, cannot sell these unhealthy items.

Thus GBS criteria should prohibit the widespread installation of vending machines that sell almost exclusively high fat, high salt and high sugar products. GBS should also develop criteria that would stop the concerning rise in fast food outlets in, for example, hospital grounds.

Provision of fish by caterers

If caterers serve lunch and an evening meal, fish is provided twice a week, one of which is oily. If caterers serve only lunch or an evening meal, an oily fish is available at least once every 3 weeks (page 4, Annex B, list of criteria in the GBS Impact Assessment).

The encouragement given by these criteria to public sector caterers to serve fish twice a week, without reference to any sustainability criteria, is unacceptable, given the severe risk to global fish stocks. This is yet another example of how health and sustainability criteria must be integrated, rather than being listed as separate entities.

The encouragement to eat oily fish is for the cardiovascular and other benefits of long-chain polyunsaturated fatty acids (omega-3 oils) in oily fish. Oily fish are generally deep sea fish, and could be recommended in GBS criteria if they were accredited as sustainable for their fishing method and management of marine stocks and marine ecosystems.

The recommendation that “fish is provided twice a week” also implies the provision of white fish. However, there is no need to require white fish as a low-fat protein option, since protein intakes in the UK are well above what is nutritionally necessary and, in any case, there are plenty of non-marine sources of low fat protein. Thus there should be no encouragement to use white fish in GBS. If white fish is used, it should have *bona fide* sustainability credentials, for example Marine Stewardship Council certification.

The GBS Impact Assessment refers to the importance of increasing consumption of oily fish and draws attention to the www.eatwell.gov.uk/healthydiet/nutritionessentials/fishandshellfish/ website. This reference should be deleted unless the website is revised immediately because a number of endangered species are listed in the section categorising oily and white fish, under the encouragement “Why not try eating something different?”

³⁴ <http://www.fao.org/english/newsroom/focus/2003/fruiteveg3.htm>

4. COMMENTS ON THE DRAFT GBS ENHANCED OPTION LEVEL

We comment below on the proposed food-related draft GBS criteria for 'enhanced option', which we have not already covered above.

Menu cycles are analysed to meet stated nutrient based standards relevant to the major population subgroup of catering provision encouraged but not mandatory (page 4, Annex B, list of criteria in the GBS Impact Assessment).

As we have already noted, this must be at the heart of successful standards to improve public sector food. The highly successful implementation of the school food guidelines demonstrate that meaningful nutrient based standards which are relevant to specific populations can be universally adopted across an entire sector. The specific nutritional and cultural needs of diverse customer groups should be built in at all levels and make clear progress towards required good practice.

Menus (for food and beverages) include calorie and allergen labelling are encouraged but not mandatory (page 5, Annex B, list of criteria in the GBS Impact Assessment).

Whilst we welcome the inclusion of this criteria in the draft GBS, we recommend that it should be a basic level requirement. We agree with Health Secretary Andrew Lansley who recently announced that he wanted to see calorie counts on restaurant and takeaway chain menus and can see no reason why this should not be mandatory for the public sector. If this is left voluntary, experience from the FSA has shown that take up will be minimal, rendering the initiative ineffective.³⁵

Further, it is a basic requirement for food, wherever it comes from, to list known allergens. This is essential information for many thousands of people who suffer ill (sometimes life threatening) effects from specific food components. No-one from the retail sector would argue otherwise.

³⁵ <http://www.independent.co.uk/life-style/food-and-drink/news/fast-food-chains-drop-watchdogs-caloriecount-display-scheme-2035412.html>