Response ID ANON-VEQT-XW4W-T

Submitted to Seeking views on possible changes to public sector food and catering policy.
Submitted on 2022-09-01 14:45:36

Privacy notice and data protection

Would you like your response to be confidential?

No

If you answered Yes to this question, please give your reason::

Some information about you

What is your name?

Name:
Emily OBrien

What is your email address?

Email:
emily@foodmatters.org

Who are you responding as? (select one option only)

Campaign group/NGO - In an official capacity as the representative of a non-governmental organisation / trade union / other organisation

If Other, please specify::

What is your role in the public sector food supply chain? (If you have multiple roles, select the one which best represents your interests in this consultation response) (select one option only)

Other

If Other, please specify::
Responding on behalf of the 80+ Food Partnerships which are members of Sustainable Food Places - www.sustainablefoodplaces.org

Which areas of the public sector do you currently carry out this role in? (select all that apply)

Other

If Other, please specify::
Responding on behalf of the 80+ Food Partnerships which are members of Sustainable Food Places - www.sustainablefoodplaces.org. Food Partnerships work cross-sector.

Which region(s) of the UK do you currently carry out this role in? (select all that apply)

South East, London, North West, East of England, West Midlands, South West, Yorkshire and the Humber, East Midlands, North East, Wales, Scotland, Northern Ireland

Business size

Please identify if your organisation is one of the following (select all that apply)

Voluntary, community and social enterprise (VCSE)**

Scope of the policy

Do you think the policy should also be made mandatory for (select one option per setting)

8a.scope - Early years education?:
Yes

8a.scope - Primary schools?:
Yes

8a.scope - Secondary schools?:
Yes

8a.scope - Further education?:
Yes

8a.scope - Higher education?:
Yes

8a.scope - Local authorities?*:
Yes

8a.scope - Residential care?:
Yes

Why do you think the GBSF should, or should not, be made mandatory in these sectors? Please provide details and be clear which setting your explanation refers to.:

Food Partnerships strongly agree that transforming public sector food procurement is vital to bring about better food systems - addressing simultaneously health, poverty, and the climate and nature crises.

Food Partnership-led approaches are already transforming public sector procurement for example in Brighton & Hove, Bristol and Leicestershire. Food Partnerships are cross-sector and many include large caterers as well as local authorities in their membership. Some e.g. Brighton & Hove also host caterers networks which share good practice and influence policy. Many have already blazed a trail by using their partnership approach to agree local minimum buying standards in their area. (see for example https://www.brighton-hove.gov.uk/brighton-hove-city-council-good-food-standards).

Our research has also shown strong public support for an improvement in standards. Polling commissioned by Sustainable Food Places and carried out by Savanta ComRes in September 2021 found 68% of the public either strongly or somewhat agreed that public sector food should provide a healthy and sustainable diet. The results were consistent across socio-economic groups and slightly higher in older people.

The poll also asked about supporting British producers through the public sector, and 79% agreed that public institutions should be made to serve high quality and high animal welfare meat and dairy produce that meets British standards as a minimum. Positive responses were highest in the over 55s and those in the North West and South East of England.

There was very strong support for public sector food to help address climate change specifically, with 80% agreeing that food served in the public sector should help people minimise their impact on the environment and limit climate change. (See also https://www.sustainablefoodplaces.org/news/day_celebration_and_action_sep21-/)

There is also strong support from public sector food caterers. Our survey found overwhelming support for serving sustainable and healthy meals. Nearly all want to do more, but say that leadership and policy from government isn't supporting them to do so. They report that current buying standards don't allow for or guarantee sustainable and healthy food. They also say that costs and product availability are barriers, with suppliers lacking the clear direction that would allow them to invest in products for public-sector customers.

With £2bn spent on public sector catering annually, and roughly a quarter of the population fed in a public sector setting each year, this is an opportunity to normalise healthy sustainable diets and for the Government to show that it is serious about tackling health, climate change, biodiversity loss, rebuilding local food economies and food security & resilience simultaneously

Making standards the norm creates a level playing field, and guarantees a market, creating economies of scale for producers and suppliers, and ultimately will help reduce the price premium for 'good' food.

However, it is vital that extra funding supports cash-strapped public sector settings to introduce the changes, particularly at first while markets grow and stabilise. Currently catering managers in schools, colleges, early years settings and residential care homes operate on incredibly tight margins, and they are already deeply worried by catering inflation costs – recently estimated at 13%. The new standards will only succeed if they receive the support needed to enable them to achieve these aspiration

Do you think that food retail should be exempt from public sector food policy? (select one option only)

No – retail should have to comply with the relevant food sourcing standards and data reporting requirements.

Fair and transparent procurement guidance principles

How far do you agree or disagree that the proposed guidance principles will support each of our objectives? (select one option per objective)

10.objectives support - Objective 1: Promote procurement of local, sustainable, healthier food and catering:
Strongly agree

10.objectives support - Objective 2: Open up public sector supply chains to a wider range of companies, particularly small and medium-sized enterprises (SMEs), to better support local economies, increase resilience, and encourage food producers to innovate:
Strongly agree

10.objectives support - Objective 3: Increase transparency of food supply chains to drive continuous improvement and build our understanding of what is bought, served, sold and wasted in the public sector:
Strongly agree

Do you think there are any ways the proposed guidance principles could better support our objectives?

Do you think there are any ways the proposed guidance principles could better support our objectives?:

We recommend that the wording 'wider range of companies' should be broadened to read 'companies and charities/ social enterprises' as there is potential for community growing projects, surplus food redistribution projects, allotments, food hubs etc to provide local ethical food in public sector settings, potentially generating income for valuable community projects as well as supporting local sustainable food production.

Which percentage split, if any, should government recommend for the evaluation of food and catering tenders? (select one option only)

Not Answered

Social value:

Cost:

Quality:

How far do you agree or disagree that you have the required information and resources to confidently measure and demonstrate (for suppliers) or evaluate (for procurers) the social value, as per the Social Value Model, of food and/or catering contract tenders? (select one option only)

Not Answered

Please expand on your answer if you would like to::

Changes to the government buying standards for food and catering services

Food sourcing (1)

How far do you agree or disagree that the proposed new target will be effective in delivering on the vision that public sector food procurement is an exemplar to wider society in delivering positive health, animal welfare, environmental and socio-economic impacts? (select one option only)

Strongly agree

Based on the proposed definitions in Table 1, what proportion of your current food spend is on locally produced food and food produced to higher environmental production standards? (select one option for higher environmental and one for local)

15.current spend - Food produced to higher environmental standards:

15.current spend - Food produced locally:

Table 1 contains our proposed definition of "local". Please rank the following definitions of 'local' in your order of preference – where 1 is most preferred.

16.rank local definition - The number of miles from point of production to point of consumption.:
2

16.rank local definition - The number of links in the supply chain between producers and consumers.:
3

16.rank local definition - Ingredients produced/grown/caught within the same region as they are consumed, or a neighbouring county (for counties at regional boundaries)(as proposed).:
1

The proposed definition of 'locally produced food' is ingredients produced/grown/caught within the same region as they are consumed, or a neighbouring county (for counties at regional boundaries). How do you think we should define 'region' for the purpose of this definition? (select one option only)

Map 2: 4 multi-region "regions": North West, North East, Yorkshire and Humberside grouped together, West and East Midlands grouped together; South East, East and London grouped; South West

For procurers and suppliers of food to the public sector: Leaving costs aside, do you think it will be technically feasible for you to increase the amount of locally produced food you procure / you supply to the public sector? (select one option only)

Not applicable

For those who do not procure or supply food to the public sector: Leaving costs aside, do you think it will be technically feasible to increase the supply of locally produced food to the public sector? (select one option only)

Yes

What are your main barriers to achieving an increase in locally produced food in practice? How could government support you to overcome these? Please be specific where possible in your answers.

What are your main barriers to achieving this in practice and how could government support you to overcome these? Please be specific where possible in your answers.:

Barriers to production in practice include gaps in local food infrastructure (e.g. loss of abattoirs and mills) which urgently need rebuilding, lack of incentives and subsidies to support and prioritise local and sustainable production; and fragmentation i.e. a lack of a joined up approach to food which stretches right up and down the food chain from purchaser to producer.

Fragmentation however can be addressed through good partnership working. Many food partnerships already play a key role in developing innovative approaches to shortened supply chains, whether through agreeing joint local standards, coordinating approaches to procurement e.g. new dynamic procurement models (pilots in several areas notably the SouthWest) hosting regional procurement and purchasing networks, and running or supporting local food hubs.

We are confident that if government follows the recommendation in the recently launched Government food strategy to support a food partnership/ food strategy model, bringing together producers, retailers, local authorities, local food purchasers such as NHS and Universities, and the voluntary & community sector for place-based collective action, this will enable the required joined up approach in many more local areas.

Without a partnership approach, there is a real danger that England will lag behind Wales where government has just announced £3 million funding to support local food partnerships which will greatly enhance delivery of type of aspirations outlined in this document.

The mechanics of breaking down larger contracts to enable local, sustainable and ethical producers, especially those which are small and micro, is a barrier, and we recommend Government supports mechanisms such as Dynamic Procurement which has an emerging track record supporting a localised food economy.

Please also see comments above regarding need for transitional support for cash-strapped catering managers to ensure success. Once 'better' food becomes the new normal we are confident however that costs will come down but interim support is vital to ensure success.

What percentage, if any, do you think the mandatory requirement for food certified to higher environmental production standards should be? (select one option only)

20-29%

Please provide details on why you selected this answer::

What are the likely cost implications, if any, of this proposed new requirement that 20% of food spend must be on food certified to higher environmental production standards? Please provide evidence where possible including estimates of increases/decreases in spend and where costs may be generated.

What are the likely cost implications, if any, of this new requirement that 20% of food spend must be on food certified to higher environmental production standards? Please provide evidence where possible including estimates of increases/decreases in spend and where costs may be generated.:

A starting point of 20% is an appropriate and achievable level of ambition, however we would suggest adding an increase to 30% by 2030 and 35% by 2035

Food sourcing (2)

Standard 1.3: Will it be feasible for the public sector to be entirely supplied with in-shell and liquid eggs from cage-free systems (previously eggs from enriched-cage production systems were permitted as the legal minimum)? (select one option only)

Yes

If Other, please provide details::

Standard 1.4: Will it be feasible for the public sector to be entirely supplied with seafood with a 1 to 3 rating in the Marine Conservation Society "Good Fish Guide" (previously any Marine Stewardship Council certified fish or Marine Conservation Society "fish to eat" were permitted)? (select one option only)

Yes

If Other, please provide details::

Standards 1.5 to 1.10: Will it be feasible for the public sector to be entirely supplied with palm oil, soy, cocoa, coffee, tea, and bananas which are demonstrably legal and sustainable (certified or equivalent)? (select one option only per product)

25a.legal sustainable feasible - Palm Oil:
Yes

25a.legal sustainable feasible - Soy:
Yes

25a.legal sustainable feasible - Cocoa:
Yes

25a.legal sustainable feasible - Coffee:
Yes

25a.legal sustainable feasible - Tea:
Yes

25a.legal sustainable feasible - Bananas:
Yes

please explain your answer below, clearly identifying which product(s) this relates to.:

What price difference would you anticipate businesses to see when sourcing demonstrably legal and sustainable palm oil and soy (compared with products that are not demonstrably legal and sustainable)? (select one option only)

Please select an option from the list below:

If you answered 100% or more, please specify::

Healthier, more sustainable menu choices (1)

Standard 2.1: Will it be feasible for public sector organisations to change the menu cycle at least once every 3 months? (select one option only)

Yes, this already happens

If Other, please provide details::

Standard 2.2: Will it be feasible for public sector organisations to serve food that supports local food traditions and the cultural diversity of the local area? (select one option only)

Yes, this already happens

If Other, please provide details::

Standard 2.2: Will it be feasible for public sector organisations to indicate to consumers on menus, or through other means, local produce, UK seasonal produce, and local food traditions? (select one option only)

Yes, this already happens

If Other, please provide details::

Do you foresee any major cost implications for your organisation in relation to proposed changes to mandatory standards 2.1 and 2.2? (select one option only)

Not Answered

Please select an option from the list below:

If you answered £150,000 or more, please specify::

Please select an option from the list below:

If you answered 10 hours or more, please specify::

Please select an option from the list below:

If you answered £150,000 or more, please specify::

Healthier, more sustainable menu choices (2)

How far do you agree or disagree that the recently updated mandatory standard 2.5 'Increasing the consumption of fruit and vegetables' and best practice standard 2.6 'Increasing fibre' (as set out above) supports/encourages individuals to increase the amount of fruit, vegetables and fibre in their diet? (select one option only)

Strongly disagree

Please provide further detail about your answer::

We believe this should be strengthened. Many food partnerships are involved in the Veg Cities movement and have local campaigns which are effectively increasing availability and consumption of vegetables by working together with local partners. 22 cities and other local areas are already on board and together we have mobilised 400 different organisations to take action resulting in an additional 9.4 million portions of vegetables being served by caterers, 7200 people trained in food growing and/or cooking with vegetables and 250 different initiatives to monitor and reduce food waste.
See https://www.sustainablefoodplaces.org/campaigns/2018vegcities/

We therefore recommend strengthening these requirements and have confidence gained from our members' experience and achievements that the following is realistic and achievable:

1) All main meals should contain 2 portions of veg and/or pulses. If fruit is used in a dessert then that would be an additional bonus portion and
2) This should apply to all main meals, not just those that are part of a meal deal ('meal deals' don't exist in a lot of the public sector).

In addition, a vegetarian & vegan option should always be available, to increase options which include plant-based proteins. There are over 3 million vegetarians and vegans in the UK and such menu options are inclusive for a wide range of religious and cultural dietary needs. Offering more meat-free choices will also help reduce the climate impact of menus as well as promoting the consumption of at least 5 portions of fruit and veg per day, in accordance with the Eatwell Guide.

A variety of fruits and vegetables should be procured to ensure recommended nutrient intakes can be achieved across all age groups (and that infants from 6 months of age, and young children, can be offered a variety of flavours and textures to promote the development of healthy eating habits in line with SACN recommendations (SACN, 2018) (SACN, 2022).)

Fruits and vegetables should be offered in their unprocessed or minimally processed form, and not for example as commercially produced purées, which are frequently marketed under misleading product names which overstate their vegetable content, and which typically contain high concentrations of free sugars.

Sustainable catering services

How far do you agree or disagree that this proposed section provides clear standards and guidance on sustainable catering services to people involved with managing and running kitchens and catering services in the public sector? (select one option only)

Not applicable

Standard 3.7: How far do you agree or disagree with mandating the use of the 'Target, Measure, Act' approach and food waste data sharing, as described in WRAP's Food Waste Reduction Toolkit? (select one option only and expand on your answer below)

Not Answered

Please provide an explanation for your response: :

Standard 3.9 Will it be feasible, where single use items are required, to source recyclable versions within existing/future budgets? (select one option only)

Not Answered

If Other, please provide details::

Do you foresee any major cost implications to your organisation in relation to proposed changes to mandatory Sustainable Catering Services Standards (standards 3.1-3.11)? (select one option only)

Not Answered

Please select an option from the list below:

If you answered £40,000 or more, please specify::

Please select an option from the list below:

If you answered 15 hours or more, please specify::

Please select an option from the list below:

If you answered £40,000 or more, please specify::

Lead time for compliance

Considering all of the proposed changes, what lead in time do you think should be provided for organisations to comply with the new standards once published? (select one option only)

Not Answered

Data reporting proposals

Does your organisation already collect this information? (select all that apply)

How far do you agree or disagree that the proposed reporting requirements and publication of the data will increase transparency of the public sector food supply chain? (select one option only)

Strongly agree

How far do you agree or disagree that the proposed reporting requirements and publication of the data will drive continuous improvement across the public sector food supply chain? (select one option only)

Strongly agree

How far do you agree or disagree that the proposed reporting requirements are sufficient for monitoring and enforcing compliance with the government buying standards? (select one option only)

Disagree

Please expand on your answer if you would like to::

Some form of monitoring or spot checking needed as well as self-reporting, to ensure credibility

Could there be any unintended consequences of making the metrics publicly available? (select one option only)

Yes, for some of them

Other

Please explain your answer:

We strongly support the approach overall.
One minor issue we would flag is that in the catering sector, micro caterers especially non-profit/ social enterprises (for example a local charitable or social enterprise based meals looking to provide a meals on wheels service) may be discouraged by some of these requirements. If practical you may consider a specific exemption for smaller sized contracts (as has happened with the introduction of minimum buying standards in local areas) and/or more flexible reporting requirements or a longer phase in period for very small contracts. However the main thing to stress is our overall support which strongly outweigh this concern.
Additionally you might consider making it explicit that standards shouldn't require a level of certification that inadvertently disadvantages arrangements with micro local suppliers, including the social enterprise and voluntary and community sector. For example 'organic' or 'MSC certified' might exclude a direct sales arrangement with a community growing project or a local fisherman and very small ethical grower. These should be able to count – even if they don't have the right 'certificate' to tick a box. The introduction of dynamic procurement type models may help to alleviate this and/or careful wording which allows a level of local flexibility.
As above, the main thing to stress is our overall support which strongly outweigh this concern.

How often should the proposed data be reported to Government? (select one option only)

Not Answered

If Other, please provide details and rationale::

Do you foresee any practical difficulties with obtaining data from your supply chain to report on the metrics, as proposed? (select one option only)

Not Answered

43b.yes practical difficulties data - Total food and catering services budget (£):

43b.yes practical difficulties data - Total spend on food (£):

43b.yes practical difficulties data - Number of meals served:

43b.yes practical difficulties data - % of total food and catering budget spent with SME or VCSE suppliers:

43b.yes practical difficulties data - % of total food and catering budget spent on local staff:

43b.yes practical difficulties data - % food spend on food produced locally or to certified higher environmental production standards:

43b.yes practical difficulties data - Food waste as a % of food handled:

43b.yes practical difficulties data - Destination of food waste (tonnage per category- anaerobic digestion, composting, incineration, landfill, sewer):

43b.yes practical difficulties data - Quantity (Kg or L) of food procured per category:

43b.yes practical difficulties data - Spend (£) on food procured per category:

43b.yes practical difficulties data - Quantity (Kg or L) of food procured per sub-category:

If Other, please provide details of other practical difficulties you foresee and which metrics these link to: :

Do you foresee any major cost implications to your organisation in relation to the data reporting requirements? (select one option only)

Not Answered

Please select an option from the list below:

If you answered £250,000 or more, please specify::

Please select an option from the list below:

If you answered 15 hours or more, please specify::

Please select an option from the list below:

If you answered £250,000 or more, please specify::

Which financial year period do you think it would be feasible to first report on this data? (select one option only)

Not Answered

Please provide details about your response.:

Consultee feedback on the online survey

Overall, how satisfied are you with our online consultation tool?

Satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it.:

it is quite a complex survey, though appreciate it's a complex subject area, which i think will deter responses.
There wasn't space to include the importance of fairtrade sourcing as part of the picture (for bananas etc).
Thank you for giving the opportunity to comment on behalf of our 80 members, this is such an important piece of work and a vital opportunity to use the public purse to support good food.