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## **UK Government Food Strategy lacks ambition to achieve transformative food system change**

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### **Competing Interests**

The authors declare no competing interests.

### **To the Editor,**

Henry Dimbleby's independent review of the UK food system was published last year, providing what he called a 'once-in-a-lifetime' opportunity to reshape the food system.[1] The Government has now published its Food Strategy, responding to the review's findings and recommendations.[2] While we welcome some aspects of the Government Food Strategy, it falls far short on the measures and urgency required for the transformative change the food system needs.

Recognising the importance of food to the nation's health, environment and economy, the UK Government commissioned the first major independent review of the food system in 75 years. The Independent Review, led by businessperson and non-executive board member of the Department for Environment, Food and Rural affairs (Defra), Henry Dimbleby, involved a comprehensive synthesis of evidence, coupled with public dialogues across the nation (limited, in accordance with the Review's remit, to England). It presented evidence of the food system's contribution to biodiversity loss, deforestation, drought, freshwater pollution, the collapse of aquatic wildlife and climate change, and of the adverse effects of highly processed food on human health. The Review identified four strategic objectives with 14 well-reasoned Recommendations (Figure 1).

The Independent Review set out how UK diets will need to change over the next ten years to meet the Government's existing targets on health, climate and nature. By 2032, fruit and vegetable consumption will have to increase by 30% and fibre by 50%, while consumption of food high in saturated fat, salt and sugar will have to decrease by 25% and meat consumption by 30%. The Review called for a mandatory Sugar and Salt Reformulation Tax, with some of the revenue to be used to expand free school meals and support the diets of those living in the most deprived neighbourhoods. It called for food education to be central to the national curriculum, and for food standards to be protected in any new trade deals. It recommended measures to restore and protect the natural environment, by investing in sustainable farming techniques and new food technologies, and measures for public food procurement to address health and environmental concerns.

The Review was framed by systems thinking and presented detailed analyses of systemic failures (such as the so-called 'junk food cycle'). It recommended a range of policy tools including mandatory taxes and reporting, creating incentives for the production of healthy sustainable food, helping to reduce the escalating costs to the economy from Non-Communicable Diseases (NCDs).

The Government's response to the Independent Review was published in June. Its objectives are to deliver a prosperous agri-food and seafood sector that ensures a secure food supply in an unpredictable world and that contributes to the levelling up agenda through good quality jobs around the country; a sustainable, nature positive, affordable food system that provides choice and access to high quality products that support healthier and home-grown diets for all; and trade that provides export opportunities and consumer choices through imports, without compromising regulatory standards for food, whether produced domestically or imported.

While we welcome the Government's rhetorical commitment to long-term measures to support a resilient, healthier and more sustainable food system that is affordable to all, the overall scope and ambition of the Strategy is disappointing. It lacks a joined-up (systems-based) approach and fails to address the scale of the problems with the urgency required. A whole-systems approach to the challenges of food security and sustainability is needed,[3] but the Strategy takes a piecemeal approach with only lip service to Dimpleby's systemic analysis. The lack of systems thinking pervades the Strategy including its compartmentalisation of health and sustainability.

The Strategy includes a commitment to reduce greenhouse gas emissions in order to achieve the Government's net zero targets. But many of the proposals re-state existing environmental and farming policies which are unaligned with systems thinking and have little concern for what Dimpleby called "the invisibility of nature" whereby what we don't see or measure tends not to be valued (such as the role of microscopic bacteria in soil or the diversity of birds and insects). Without redefining the purpose of the food system for integrated planetary and human health, the Strategy fails to define a framework based on interventions, regulations, behaviours and actions which will transform the system to the healthier and more sustainable one that is so urgently required. Instead of an integrated view of the food system, the Strategy has separate sections on 'Food security and sustainable production' and on 'Healthier and sustainable eating', perpetuating the kind of siloed approach that food system thinking was designed to transcend.

In terms of human health, there is more restatement of existing government targets, such as the commitment to halve childhood obesity by 2030, to reduce the healthy life expectancy gap between local areas where it is highest and lowest by 2030, and to add five years to healthy life expectancy by 2035. Serious doubt has already been cast on whether this can be achieved [4, 5] and there is no attempt to link public health targets with environmental goals. While there is an acceptance that finding a solution to obesity is "a shared responsibility" (p.23), the Strategy perpetuates an ideologically-driven rhetoric about individual choice where individual consumers "empowered with better information" will make healthier choices. Rather than acknowledging the extent to which choices are shaped by food environments – be they physical (what's in food stores and what's promoted across indoor and outdoor spaces), economic (money available to buy food), social (cultural norms) or digital (food advertising on TV and online), the reverse argument is made with "better informed food choices ... prompting a supply response from the food industry" (p.23). Until the policies and architecture governing our food systems address the issue of the affordability of healthy diets, neither food manufacturers nor consumers will be motivated to change their current practice. The sustainability of the food system has environmental, social and economic dimensions but here, once again, they are treated separately.

Innovations in industrial horticulture, including controlled environments and vertical farms, are to be supported in the interests of economic growth and productivity, aligned with the Government's 'levelling-up' agenda, designed to spread opportunity and prosperity to all parts of the UK. But there is little or no attempt to connect agri-food innovation with benefits to public health as could have been done, for example, in the case of alternative proteins. No doubt these measures can all contribute to a healthier and more sustainable food system, but they need to be placed within wider systems-thinking in order to avoid unintended consequences and to secure public acceptability.

Of the Independent Review's 14 proposals (Figure 1), only one is fully included in the Government's Strategy (Recommendation 5 on funding for children's holiday activities and food programme) and even this is a previous commitment, announced in December 2021. Five of the recommendations will be subject to significant delays including Recommendation 2 on mandatory reporting (with implementation to begin by the end of 2023); 7 (included only as a pilot); 9 (delayed until 2023); 12 (transformed into an industry partnership on data transparency); and 13 (identified as something government "will consider" in the future). A further recommendation on investment to create innovation (11) is accepted but without substantial funding. The remaining recommendations do not feature.

Arguably most prominent among these absences is the proposed tax on sugar and salt (Recommendation 1). Having carefully reviewed the evidence, the Dimpleby Review foregrounded this as the policy with the greatest potential to stimulate system change and break the "junk food cycle". Its absence from the Government Food Strategy signals both a lack of engagement with the evidence and a lack of ambition with regard to achieving their goals. Despite highlighting the success of the Soft Drinks Industry Levy in the Strategy, government seems unwilling to use fiscal measures to encourage further industry reformulation. Similarly, while Dimpleby set a clear target to reduce meat consumption by 30% over the next ten years, the Government Food Strategy makes no such commitment.

While the Government Food Strategy has some positive features, it fails to acknowledge the scale of the challenge we are facing: an existential crisis in climate change and an intractable problem with food-related NCDs. This is partly the result of the UK's fragmented policy environment with Defra's remit necessarily focusing on England while the Devolved Administrations set their own agendas. But it also reflects a failure of vision in addressing the scale of the problems outlined in the Independent Review. We cannot continue to offer incremental, disjointed approaches to food, the environment and health. Transformative system-wide approaches are needed to improve the quality of food consumed in and out of the home, fundamental changes are needed to public food procurement in schools and hospitals, and environmental sustainability should be embedded throughout the food system to incentivise and reward farmers, food manufacturers and retailers to engage with best practice. These are the kind of transformative changes that the Government Food Strategy fails to address. It is a missed opportunity.

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## **Fig 1: The Independent Review's strategic objectives and recommendations**

### **Escape the junk food cycle and protect the NHS**

- **Recommendation 1:** Introduce a Sugar and Salt Reformulation Tax. Use some of the revenue to help get fresh fruit and vegetables to low-income families.
- **Recommendation 2:** Introduce mandatory reporting for large food companies.
- **Recommendation 3:** Launch a new "Eat and Learn" initiative for schools.

### **Reduce diet-related inequality**

- **Recommendation 4:** Extend eligibility for free school meals.
- **Recommendation 5:** Fund the Holiday Activities and Food programme for the next three years.
- **Recommendation 6:** Expand the Healthy Start scheme.
- **Recommendation 7:** Trial a "Community Eatwell" programme, supporting those on low incomes to improve their diets.

### **Make the best use of our land**

- **Recommendation 8:** Guarantee the budget for agricultural payments until at least 2029 to help farmers transition to more sustainable land use.
- **Recommendation 9:** Create a Rural Land Use Framework based on the three compartment model.
- **Recommendation 10:** Define minimum standards for trade and a mechanism for protecting them.

### **Create a long-term shift in our food culture**

- **Recommendation 11:** Invest £1 billion in innovation to create a better food system.
- **Recommendation 12:** Create a National Food System Data programme.
- **Recommendation 13:** Strengthen Government procurement rules to ensure that taxpayer money is spent on healthy and sustainable food.
- **Recommendation 14:** Set clear targets and bring in legislation for long-term change.

