

Consortium for Labelling for Environment, Animal Welfare and Regenerative Farming (CLEAR)

Written Response to the National Food Strategy
October 2021

Introduction:

Citizens are demanding a more transparent food system, and we want to see the Government grasp the once in a generation opportunity to address the current confusing labelling system. The mass marketing of cheap low-quality food (and the associated public health crisis) is reliant on the continuation of a voluntary approach to food labelling. Companies are able to hide the method of production from their customers, and often mislead consumers through unregulated terminology. This means that there is huge confusion over existing labels and low-income citizens are denied the right to make an informed choice about the food that they buy for themselves and their families. Simultaneously, farmers who have high animal welfare and who work in harmony with the environment find little way to distinguish themselves within the market. They cannot convey to the consumer the way in which their food was produced.

To fix this, the UK needs mandatory method of production labels to ensure a transparent and equitable food system. There is a growing movement at a UN level to press for worldwide mandatory labelling system so the UK has the opportunity to lead the way on this.

CLEAR was founded in 2021 and exists to campaign for clear and mandatory food labelling in the United Kingdom. Our full manifesto is available [here](#) with associated citations. At present, the consortium consists of 40 farming, food, animal welfare, environmental, social civic societies and businesses, representing a diverse range of ecological, social, and governance interests and expertise. A full list of our membership at the current time is available [here](#).

Summary of our asks:

CLEAR advocates for the need for transparent and verifiable mandatory method of production labelling for all food products sold in the UK. We believe that developing clear accessible food labels that identify method of production will respond to the consumer's desire for greater transparency over how their food is produced. This reflects the priorities and recommendations highlighted within the National Food Strategy, and, if implemented, would help to deliver against NFS Recommendations 10, 12, and 14.

Ultimately, we would like to see labelling that is based on the method of production and is;

- Mandatory with adequate enforcement mechanisms for all foods, including imports
- Data driven from the farm up through the processing system, with sufficient flexibility to allow for change and improvement
- Clear accessible presentation

In order to achieve this (and in light of the current challenges and fluidity in trade and agricultural policy), we suggest that the following steps can be taken immediately to ensure there is a clear regulatory

framework to support the full implementation of mandatory labelling which will take place over a longer period :

- Extend the current voluntary animal welfare labelling for poultry and pork, so that it is mandatory and focused on method of production
- Extend country of origin labelling requirements to cover all foods
- Improve the regulatory basis for the use of specific sustainability terms which need to properly defined
- Develop the capacity for enforcement in discussion with existing auditing schemes

CLEAR's National Food Strategy response

CLEAR welcomes the opportunity to input into the Government's thinking on the future of the National Food Strategy and the next steps and hope we will have an opportunity to engage with the discussion and provide further information. We believe that the national adoption of a data driven and mandatory method of production labelling for all foods could deliver against three key recommendations outlined in the National Food Strategy.

- **Recommendation 10: Define minimum standards for trade, and a mechanism for protecting them.**

It is essential that future trade deals provide a level-playing field so UK producers are not undercut by imports produced to a lower standard. Establishing method of production labels would allow for direct comparison and would mean that UK producers could adequately distinguish themselves within the market. To be an effective tool for consumer choice, all food sold in the UK should have mandatory method of production labelling with a role for blockchain technology to play in guaranteeing integrity across the entire supply chain. We would want to see imported foods labelled to demonstrate how it has been produced, just as we have advocated for mandatory method of production for domestically produced food.

As part of our road map in achieving a comprehensive labelling system, we recommend that an early step should be to establish a comprehensive Country of Origin label that covers all food products wherever they are purchased. We recognise the challenges that will need to be addressed regarding multiple ingredient products, so may require revision to the definition of country of origin being "the country in which they last underwent a treatment or process resulting in a substantial change".

- **Recommendation 12: Create a National Food System Data programme.**

There needs to be more transparency in our food system so citizens are better informed about their food choices. The metrics required to develop a National Food System Data programme could be matched to those required for the food labelling system to ensure that the label is based on measurable data, not subjective assessments, and ideally outcome based. It would be

worthwhile considering how the data provided through the new Environmental Land Management scheme might be utilised to streamline the process, reduce duplication and make it less cumbersome for producers. Similarly, in each of the devolved nations the labelling framework could use the data required by their respective agricultural support system instead. It would also be worth considering how the Sustainable Food Trust's Global Farm Metric could be included in the assessment.

Government should design the framework (in consultation with stakeholders) and producers would then **self-assess against the Government's framework**. The current auditing system carried out by existing assurance schemes and certification bodies (CBs), such as the Soil Association Certification, RSPCA, OF&G or Red Tractor, will be expanded to audit that **self-assessed data** with additional resource made available from Government to cover that cost. Included should be a system of earned recognition to streamline the process to save paperwork and data collection by the farmer and processor. In this way, the mandatory label is supported by the current voluntary certification schemes and would encourage their expansion.

- **Recommendation 14: Set clear targets and bring in legislation for long-term change.**

Mandatory method of production labelling, underpinned by a robust data driven framework would help to bring positive long-term change within the food and farming sector and would help Government to deliver against its 25 year Environment Plan. The expansion of the FSA (as outlined within the NFS recommendations) to cover healthy and sustainable food, as well as food safety, would create an avenue to effectively oversee the development of a labelling system.

By requiring a mandatory label that is underpinned by a rigorous, industry agreed, framework, producers will be required to take steps to provide data that will ensure transparency and integrity in their production. This would incentivize farmers to demonstrate improvements in their production methods year-on-year. Indeed, key to our proposal is that the data system is sufficiently flexible to allow for method of production improvements and new agriculture policies to feed into the system. In this way, the farmer is linked into the marketplace and to the consumer based on their farming practices.

In addition to the above, there would be secondary benefits of a mandatory method of production labelling system to help deliver against the following NFS recommendations;

- **Recommendation 2: Introduce mandatory reporting for large food companies.**

Having an agreed and regulated framework that is standardised across the entire UK will give a level playing field for all food companies to provide a more complete picture of their supply-chain and report to the Government on their environmental, social and governance (ESG) impacts. This should include country-of-origin labelling for all foods, raw and processed. Current country of origin labelling should be expanded to encompass all products. Whilst we recognise the challenges that will need to be addressed regarding multiple ingredient products, it is important the consumer is able to know where the food has been produced, and therefore make an informed

decision. For instance, it may be preferable to require revision to the definition of country of origin being “the country in which they last underwent a treatment or process resulting in a substantial change”.

Having a nationwide mandatory system that delivers information based on method of production alleviates the large food companies from developing their own labels and reporting systems. The proliferation of different voluntary labels from a range of food companies only adds confusion as one is not comparable to another. Companies can still produce their own voluntary labels to assist in their marketing (should they chose) but these would sit alongside the data driven national mandatory scheme that aims to offer a level playing field to all producers and all consumers. There is no reason why a properly audited, voluntary label, developed by a food company could not feed directly into the labelling data so those food companies with such schemes can support their producers by them gaining earned recognition as with the current assurance schemes and promoting this to their customers.

- **Recommendation 6 Expand the Healthy Start scheme**

The goal of expanding Healthy Start is admirable and should be supported. However, the UK public are confused by the labelling on food packages. By creating a simple and clear label that is consistent across all foods, citizens will be better placed to make healthy choices for themselves and their families. This would also include better regulation of the terminology used on food packages. Brands have begun to use terms that evoke sustainability to command a premium price or affect consumer choice. However, these terms have no set definition, and consequently, there is no standard against which sustainability claims can be made. Similarly, farm imagery is often used deceptively on package to create a false perception. We would also want to see the strengthening of the existing Advertising Standards Agency regulations (with additional resource for enforcement) so that there could be improved safeguards for misrepresentation to the consumer.

- **Recommendation 8 Guarantee the budget for agricultural payments until at least 2029 to help farmers transition to more sustainable land use.**

To make sustainable land management profitable, farmers cannot rely on subsidies alone. There needs to be a way for sustainable farmers to differentiate their products within the marketplace, in order for them to be better rewarded for their stewardship. By creating mandatory method of production labelling, it will allow more environmentally sustainable and higher welfare producers to differentiate themselves within the market and communicate their standards directly to consumers. By creating a label by which producers can indicate their method of production, they would be better able to inform the consumer of the environmental and animal welfare benefits of their product.

That said, there is a clear push for metrics and benchmarking to be part of the ELM support programme in order to demonstrate that public goods really are being delivered for public money.

This metrics required for ELM monitoring could feed into the labelling system as earned recognition, streamlining the process for farmers and reducing the bureaucracy of data-collection.

It is essential that the framework, and data-collection technology that underpin the labelling scheme are fit for purpose. There is much work going on at a UN level to promote a global labelling system and it would be valuable to consider the work being done within the UK by the Sustainable Food Trust on a Global Farm Metrics that have already made significant progress on this front. Connecting data from farm level through the system to the producer and the final product and ensuring that it is clearly communicated will give clarity to the consumer, whenever they make food purchases. Unless this is done, the full potential of the data collection for the metric will not be realised and the current opportunity that we have to establish the legislative framework to deliver this, will be lost.