

Food we can trust - making it happen: Address to the Westminster Food & Nutrition Forum

FSA Chief Executive Emily Miles today called on government, private sector, and civil society to work closer together to address the challenges facing the food system. She was speaking to the Westminster Food & Nutrition Forum seminar: Developing a new National Food Strategy for England. Transcript of the speech as follows:

Introduction

Henry Dimbleby, who heads up the National Food Strategy, outlined three systemic challenges for the food system:

- ensuring food makes us well not sick;
- that food protects the planet, and doesn't degrade it; and
- that food is available and affordable for everyone.

Today I want to argue that obesity, supply shocks, and environmental degradation require Government to think fundamentally differently about our roles, how we work together, how we work with the private sector and civil society, and how we all attend to the consumer interest.

I have been the Chief Executive of the FSA for nine months. I have not spent my career in food; I have spent 20 years in Government administration, getting things done in complex situations: Brexit and no deal preparedness for Defra; policing for Home Office; and Asylum and immigration in Home Office, Number 10 and Cabinet Office.

I offer these comments on food strategy, a subject that goes wider than the FSA's remit, because I've watched and been part of successes, and failures, in Government and I have learnt a lot from both.

For those of you that do not know much about the FSA, it is a non-ministerial Government Department, so without a Secretary of State, but with an independent Board, set up in 2000 to prevent a BSE crisis ever happening again. That crisis came about because the consumer interest had come second to both economic and political interests; ultimately to the detriment of public trust in food. We work in England, Wales and Northern Ireland and closely with colleagues in Food Standards Scotland. Public health is at the core of our mission, though our statutory remit asks us also to look at 'other consumer interests in food'.

The learning from COVID-19

COVID-19 has acted as a barium meal for the food system, showing us where the strengths are and highlighting the defects.

What have we learnt?

- Supply and food safety have been maintained in difficult circumstances.
- Governments and local government across the UK moved quickly to change policies and practices to help keep food on shelves.
- The private sector pivoted from supplying wholesale and catering, to supplying retail.
- Government, local government, the private sector and civil society worked at great speed to give priority access to vulnerable consumers to food parcels and supermarket slots.

Many of the things I saw in those weeks in March and April moved me as a civil servant. But there were instances where I think we could have done better.

Sometimes it took precious time to join up because responsibilities sat across all UK Governments and several Government departments (late guidance, labelling easements).

We have not delivered for all consumers. The FSA's [COVID-19 consumer tracker](#) shows that one in six of us have cut meals or portion sizes because of worries about money since the end of March.

I don't think we yet know if diets improved or got worse. If environmentally sustainable practices were promoted rather than ignored. And if residual food poverty will be uncomfortably endemic in the UK for some time. Those long-term concerns deserved consideration alongside the urgent need to get food on people's plates.

Consumer interests must always trump economic interests

The FSA believes that the consumer interest is served when consumers have food they can trust. This is about consumer safety, and food that is what it says it is; but also about the 'public goods' of a planet that is biodiverse and able to support life, and of a healthy population that doesn't drain the NHS of funds through obesity and its associated diseases.

The BSE crisis that led to the birth of the FSA is estimated to have cost the nation £3.7bn (not adjusted for inflation). It also ruined the UK's ability to export beef abroad for many years; the UK only secured access to the US's beef market in 2014. Governments and the private sector ignore the consumer interest, and trust in food, at their peril.

The questions of nutrition and obesity, food supply, food poverty, food waste, and the environmental cost of producing and selling food, are not for the FSA to solve: food safety and authenticity are our primary concern. These questions sit squarely on the shoulders of other parts of Government, such as Defra, Public Health England and Public Health Wales, [DAERA](#), Department for International Trade, Department for Work and Pensions, and devolved administrations.

Yes, from January 2021, the FSA has a role in looking at consumer interests and 'other legitimate factors' than food safety when giving advice to Ministers on regulated products, so our remit goes beyond food safety. But mostly, these other departments and agencies are resourced and charged with leading the work.

This segregation of activity within Government is largely invisible to outsiders. That is why I think we need to join up better internally in Government and with devolved administrations to work with the private sector and civil society. Given what is at stake, Government needs to act with impatience, boldness and ambition, to safeguard food you can trust.

How to build trust

Over its twenty-year history, the FSA has learnt a lot about maintaining and improving trust. We are in the top quartile of government organisations in terms of trust. We believe this is because of a mixture of the following:

- good intent. We show our decisions are not made for political or economic gain, but for the consumer interest above all else.
- telling the truth. We are consistently honest about food, we obsess about science and evidence, and we are up front about what we do not know, communicating a degree of honest uncertainty. Truth generates trust.
- transparency, so that the evidence can be debated. For example, uniquely, FSA's board meetings are live-streamed and all papers are made available two weeks in advance.
- listening, so that work is informed by what is, not what we imagine to be. That's why, for instance, we launched our COVID-19 consumer tracker in April so that we could have more real-time information on the consumer experience. Listening can take many forms. Social media listening, algorithms, focus groups, correspondence, surveys. We want to listen even more carefully to different audiences, both business and consumer.

These approaches, in my mind, need to be fundamental to government work beyond the FSA on obesity, climate and food supply.

The relationship between the regulator and food businesses: trust and 'making it easy'

That trust also needs to extend, more, from government to the private sector.

To trust, or be suspicious? I object to an ideological distrust of the private sector. We have to challenge the notion of the regulator as being there solely to rein in the worst excesses of the "Robber Barons". A regulator that chooses trust over suspicion, or suspicion over trust, is not fulfilling its responsibilities. The FSA must do both. Acting in the consumer interest will mean the regulator will set and enforce strong standards and stand up to bad actors. But to assume that the food industry is stuffed with exploitative corner-cutting businesses is lazy thinking, leads to duplicated effort and, crucially, misses opportunities to do good.

Let's take the example of food safety and large retailers. Do I trust Tesco, Aldi or Sainsbury's to take food safety seriously and more so than some other food businesses? Yes.

Do the retailers tend to share the FSA's obsession with getting labelling accurate? Yes. The FSA knows this because of the constructive way they work with us on product recalls and withdrawals; and the consumer knows this because they carry on shopping there, safely.

This mutual interest presents an opportunity for the regulator. Why? The food system is a network with a variety of nodes including some influential hubs, like the retailers, larger hospitality companies, or the digital platforms (Just Eat, Deliveroo, etc.). This means that some businesses have a wide impact on the behaviour of other businesses.

The FSA, and, I would argue, Government, need to tailor our regulatory effort to the reality of this network model. We must understand and amplify the network effects which benefit the common good.

This also means that I think it falls to the regulator to make it as easy as possible for business to do the right thing, especially for those businesses who are influential over the system.

- Our standards and guidance should make sense and be easy to follow.

- The approach to proving compliance should be simple and make sense with third party systems.
- Our data should be easy to pick up and insert into others' platforms.
- We should give sufficient notice about changes to rules.
- We should create the right fundamentals which facilitate sharing of best practice and sharing of key data.

In sum, we should design in compliance.

That's fine for food safety. Obesity, climate change, and food supply are different types of challenge. They impact on the consumer, and the public good, over the long-term. So how should Government tackle those?

Taking the principles I describe above, I would argue governments need to both trust and be suspicious, tailoring their policies to particular challenges. Just as with COVID-19, governments need double down on all the things available to us to make a difference:

More partnership working, more trust, more data sharing, more best practice promotion, more education, more communication, more listening, more science, more research; more minimum standards, more enforcement, and more financial incentives.

But, first and foremost, we need common purpose between government and the private sector.

COVID-19 has shown us what happens when the country unites around a common purpose and the Government provides leadership. There were new rules and laws and powerful financial incentives. But businesses did the right thing not just because of the law. We saw a lot of behaviour change because of common endeavour, a shared vision, a common understanding of the risk, and a common view on how to mitigate the risk.

We will go further, faster, if the industry, civil society and local government are jointly committed to tackling these big systemic challenges alongside government, from a place of common purpose. I think Government, by whom I particularly mean the politicians and senior officials in Wales, Scotland, Northern Ireland and Westminster, need to nourish a deep, shared commitment with those across the food system to tackling these systemic challenges.

Government has to protect the common good

This is because Government is in a unique position.

While businesses are directly responsible for food you can trust, Government is the only actor in the system that is responsible for the public good in the face of market failure. It is the taxpayer who will meet the cost of obesity to the NHS. It is the governments and local authorities of the UK who must look after the population if there are any food shortages that result from damage to our environment. It is also Government that provides the safety net to avoid food poverty.

Those big challenges can't be solved by a single government department or local authority. They require complex solutions and collective effort. I know from experience that it is hard to work across many institutions or departments.

It can happen: usually when the PM is interested and where there is huge political will at the centre of Government; or when there is a pressing and avoidable crisis; or when an institution is given an ambitious and non-negotiable goal with sufficient resource.

Even then, it is easy for Westminster to forget about devolved interests or local government and go for command and control; easy not to collaborate for the whole of the UK's single market (e.g.

labelling); and easy to focus on the next couple of years, and not the next 25.

For food you can trust, Governments, local government and government departments must pool their powers, their knowledge, their consumer understanding, their science and, crucially, their relationships with industry and civil society.

We need to join up our thinking because we are stronger, together. Fragmentation within and between governments leads to failure and missed opportunities, because it leads to uncertainty and inconsistency for the food industry, and lack of clarity and direction for consumers.

Conclusion

COVID-19 has shown that government, the private sector and civil society in its broadest definition, can collaborate to achieve common good. We need to do this for the systemic challenges facing the food system.

For the FSA, this will mean a wider range of relationships. We will look to make it easy for food businesses to do the right thing, especially on food safety; and how to work in closer partnership with those parts of the food system that have the most impact on others, where we have mutual purpose. This is on top of our traditional law-based interactions.

It will mean us continuing to tell the truth about food, sharing our science and consumer insight with governments, local government, the private sector and civil society, and making our contribution to the national effort.

It will mean us looking at how to maintain and improve food standards, taking advantage of any freedoms as the UK comes out of the EU-exit Transition Period. And it will mean us continuing an unwavering commitment to acting in the consumer, not the political or economic, interest.

But the FSA alone is only one actor in tackling those big food strategy challenges. For food you can trust, that spirit of common endeavour that has been the hallmark of the best of our response to COVID-19 has to continue.

That will ensure that government, industry and civil society work to ensure the transformation of this beautiful, amazing, complex and essential system. This turning point needs leadership, so that we feed the nation while also looking after the planet, for generations to come.