

Harmonising health in a Green Brexit:

Public health messages in responses to the
*Health and harmony: the future for food,
farming and the environment in a Green
Brexit* consultation



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Note:

This limited analysis is intended as an apolitical summary to inform debate by the UK Public Health Network. Any errors in interpreting the consultation responses are the responsibility of the author. This work does not represent the views of the UK Public Health Network.

Summary

Responses by 71 organisations to the [Health and harmony: the future for food, farming and the environment in a Green Brexit](#) consultation by DEFRA in 2018 were examined for alignment on key public health messages of: public health as a public good, healthy food and nutrition, food labelling (production method), antimicrobial resistance, “polluter pays,” sustainable development goals (SDGs), and standards for trade. 5% of responses were from public health organisations.

Overall:

- 15% of responding organisations felt that future agricultural policies, including the proposed Agriculture Bill, must be aligned with the Sustainable Development Goals.
- 32% of responding organisations felt that public health should be defined as a public good. Several organisations expressed disappointment that, despite the title of the consultation, health was largely absent from the proposals.
- 30% of responding organisations commented on the proposal to adopt the principle of “polluter pays” with 86% of the comments being in favour.
- 27% of responding organisations provided positive support for an agriculture policy that addresses antibiotic overuse in farming and agriculture to protect human health.
- 39% of responding organisations provided positive support for the need for an agricultural policy that supported a healthy diet. The opportunity to align agricultural policy with food production and impact on the environment was broadly welcomed. Other comments on diet and nutrition covered: food as a human right, sustainability, cost, public procurement, nutrition, promotion of horticulture and decreasing support for the production of unhealthy food.
- 37% of responding organisations commented on DEFRA’s consideration of food labelling, with 88% of the comments being in favour of clear labelling that identified methods of production. There were calls for such a scheme to be extended to all meat and dairy products.
- 49% of responding organisations reflected on the need for a UK trade policy to protect current high food and animal welfare standards. Respondents warned against “a race to the bottom” and felt the World Trade Organization rules may offer some protection. The need to prevent regulatory divergence across the UK was noted.

The disconnect between the title of the white paper and its proposals was noted with advice that the close relationship between food, farming, environment and public health cannot be over-estimated. A new agriculture policy presents a generational opportunity to establish an integrated system that works across all government.

Although it focuses on a small sample of the 44000 responses to the consultation that were published, this briefing may help the public health community build links with other organisations. As one organisation pointed out, agriculture could learn from public health and focus on the causes of the issues and not the solutions.

1. Introduction

The white paper [*Health and harmony: the future for food, farming and the environment in a Green Brexit*](#) was published by the Department for Environment, Food and Rural Affairs (DEFRA) on 27 February 2018. It was accompanied by a consultation that ran from 27 February-8 May 2018. The wide-ranging proposals covered 15 areas, including: reforms to the Common Agricultural Policy, how farming excellence might be achieved, the concept of public money for public goods, enhancements to the environment, improving animal welfare, supporting rural communities, the regulatory framework, devolution, and the proposed Agriculture Bill. DEFRA reported that it received over 44000 responses.

As the health of the public is shaped by a wide range of societal, economic and environmental factors, there are many ways in which the consultation responses could have been analysed. In order to provide a timely overview for the public health system, this briefing concentrates only on some key issues - as identified in responses to the consultation by public health organisations.

2. Methodology

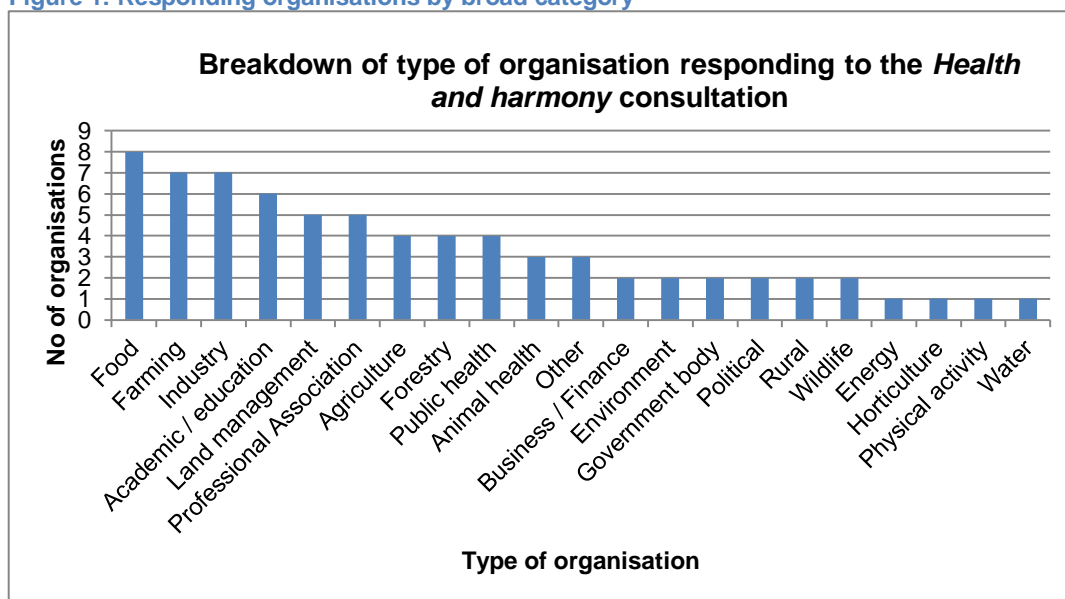
A Google search was conducted on 29 May 2018 to find organisations that had published a response to the consultation, using the search terms: “health and harmony consultation” or “food and farming consultation,” or “future farming consultation” and limiting publication date from 27 February - 29 May 2018. The cut-off point was dictated by the aim of producing a report in time for a meeting of the Food, Farming and Countryside Commission in mid-July. The search retrieved 74 responses, of which seven were not included because they were either a press release welcoming the consultation or stating that the organisation had submitted a detailed response that was not found to be publicly available. An email was also sent to the UK Public Health Network for any responses not published online at the time of the search. This resulted in four responses, one of which is now available online. A total of 71 responses have therefore been included in this analysis, a list of which is given in [Appendix 1](#).

The organisations cover public health, food and farming industries, professional associations, academic organisations, government and political bodies and environmental organisations. Figure 1 shows a breakdown by type of organisation.

Responses were extracted into a spreadsheet and coded according to key public health issues, as identified from responses to the consultation by public health organisations:

- Public health as a public good
- Healthy food and nutrition
- Food labelling (production method)
- Antimicrobial resistance
- “Polluter pays”
- Sustainable development goals (SDGs)
- Protecting standards through trade

Figure 1: Responding organisations by broad category



Caveats

- Responses to the consultation outside these areas have not been included. This may mean that opinions have been taken out of context. It may also mean that some richness has not been captured from the wider environmental factors that impact on the health of the public.
- The consultation responses retrieved for this briefing ranged from a few pages to extensive technical analysis, resulting in difficulties in transcription. This may mean that some relevant comments related to public health issues have been missed.
- DEFRA reported that 44000 responses had been received for this consultation. The 71 published responses retrieved and analysed here may not be a representative sample. It may also suggest a bias towards campaigning or lobby groups.

3. Top level findings on public health issues

3.1 Sustainable Development Goals (SDGs)

The *Health and harmony* consultation paper makes reference to “international obligations” but does not reference the UN Sustainable Development Goals. At least half the SDGs could be considered of direct relevance to a new food and farming policy in the UK.

Of the 71 responses examined, 11 made specific mention of the UN Sustainable Development Goals. Two of the four public health organisations who included a response flagged the SDGs as being of importance to a food and farming policy and to the proposed Agriculture Bill in particular. Table 1 provides a breakdown of responses. Some organisations, such as the Wildlife Trusts, recommended setting out “Future farming and land management policies [that] will facilitate the UK to meet international obligations associated with biodiversity, climate change and sustainable development” but did not cite the SDGs.

Table 1: Organisations' comments on the Sustainable Development Goals

Organisation	Response
Anaerobic Digestion and Bioresources Association	<ul style="list-style-type: none"> The AD industry is committed to improving soil health and supporting the global aim of achieving land degradation neutrality ... thereby achieving several of the UN Sustainable Development Goals.
APPG Agroecology for Sustainable Food & Farming	<ul style="list-style-type: none"> The Agriculture Bill provides an opportunity to better align our agriculture policy with the Sustainable Development Goals – the second of which is Zero Hunger
Faculty of Public Health	<ul style="list-style-type: none"> Strongly recommend that the Agriculture Bill aligns with key international goals of which the UK is a signatory and supports progress against the Sustainable Development Goals.
Food Ethics Council	<ul style="list-style-type: none"> Would like the Agriculture Bill to be redesigned as a Sustainable Agriculture and Food Bill, and that this be embedded within a broader sustainability and climate change framework ... to ensure UK food and farming fulfils its obligations as part of the Sustainable Development Goals
Food Foundation	<ul style="list-style-type: none"> Continue to reduce household and supply chain waste of fruit and veg (as we have committed to do within the Sustainable Development Goals)
Green MEPs	<ul style="list-style-type: none"> We also have a responsibility to ensure that Agriculture helps to deliver the Sustainable Development Goals, to which the UK has committed, including SDGs 2 and 15 – Zero Hunger and Life on Land.
National Pig Association	<ul style="list-style-type: none"> AMR (antimicrobial resistance) puts the achievement of the UN's Sustainable Development Goals related to health, agriculture, animals, environment and food directly at risk
Royal Society of Biology	<ul style="list-style-type: none"> biosciences are central to at least half of the SDGs, including ensuring health and access to food security and the SDGs could provide a guiding principle for the future Agriculture Bill
Sustain	<ul style="list-style-type: none"> Ensure that trade policy and agriculture policy do not undermine the UK's cross-departmental commitment to the Sustainable Development Goals UK is committed to the achievement of the Sustainable Development Goals (SDGs) - which includes ambitious aims such as eradicating poverty and hunger as well as those specifically relating to trade relationships - the UK needs also to plan progress against these goals Allowing UK buyers to purchase unfairly from businesses in poorer countries would be in contravention of the UK's commitments as a signatory to the Sustainable Development Goals
The A Team	<ul style="list-style-type: none"> the Agriculture Bill provides an opportunity to better align our agriculture policy with the Sustainable Development Goals – the second of which is Zero Hunger – by enabling easy and affordable access to healthy food for all
UK Health Forum	<ul style="list-style-type: none"> Align agriculture policy with the objectives and obligations of international agreements that the UK is signed up to such as the Sustainable Development Goals

Note: policies broadly aligned with public health are flagged in blue type.

3.2 Public health as a public good

The Royal Society for Public Health captured the need to include public health as a public good by commenting that “the biggest step that could be taken to improve the proposed policies is to explicitly include public health as one of the public goods that farmers will be rewarded for producing.” There is positive support for this view from 23/71 organisations, many pointing out that, although “health” features in the title, it is missing from the rest of the consultation. Table 2 provides a breakdown of responses by type of organisation. Organisations such as the Wellcome Trust, (that wants “the UK to adopt a vision for food production that recognises and incentivises health and nutrition from “field to fork,” and the Wildlife Trusts, (that recognised the “need to put the health of our environment at the heart of our future agriculture and land management policy,”) appear to support public health but stopped short of recommending that it be included as a public good.

The Tenant Farmers’ Association felt that “public health may be under pressure but this has little to do with the CAP and has more to do with wider supply chain issues, income inequalities, issues of food sovereignty, lifestyle choices, the growth of convenience foods and poor diet. Farmers are not responsible for any of that.”

Note: The *Health and harmony* consultation provided no definition of a “public good.” The economic definition attributes two characteristics to a public good, that of non-rivalry and that of non-excludability. This means that consumption of a good must not reduce availability for anyone else and its provision cannot exclude anyone from accessing it. Respondents to the consultation may not have used this definition, creating the potential for confusion in interpreting comments.

3.3 Adopting the “polluter pays” principle

DEFRA proposes that the new land management system be based on the basis of the polluter pays. This principle is based on the Rio Declaration 1992¹ that recognised those who produce pollution should bear the costs of managing it to prevent damage to human health or the environment. Although this was not framed as a specific question in the consultation document, 21/71 organisations commented on the proposal to adopt the “polluter pays” principle. No public health organisation commented on the proposal but the issue was included in this analysis because it was a key feature in previous manifestos.

Of those in favour, the Chartered Institute of Ecology and Environmental Management felt that “farms that pollute the countryside ... should be automatically barred from gaining public funding until their land is cleaned up.” The English Organic Forum proposed that the principle could be “reinforced through more transparent labelling.” The National Trust commented that the polluter pays principle will be a necessary safeguard as “regulatory measures alone will not enable us to reach aspirational and statutory environmental targets” – a view supported by the Friends of the Earth, the Woodland Trust and National Parks England.

¹ *The Rio declaration on environment and development* United Nations Conference on Economic Development, 1992 http://www.unesco.org/education/information/nfsunesco/pdf/RIO_E.PDF

Table 2: Organisations supporting public health as a public good

Type of organisation	Organisation
Academic	University of Exeter Business School
Agriculture	Agricology Soil Association
Environment	Chartered Institute of Ecology and Environmental Management Friends of the Earth
Farming	English Organic Forum Growing Communities
Food	Eating Better Food Ethics Council Food Foundation GM Freeze Sustain The A Team Vegan Society
Food industry	Organic Farmers & Growers
Land management	National Parks England
Other	People Need Nature
Political	APPG Agroecology for Sustainable Food & Farming
Public health	Faculty of Public Health Royal Society for Public Health Scottish Managed Sustainable Health Network UK Health Forum
Rural	Campaign to Protect Rural England

Whilst declaring support for the principle, the Woodland Trust also felt there was a need for further clarity on how this would work. The Sustainable Food Trust suggested the introduction of a tax on nitrogen fertiliser in nitrate vulnerable areas. Growing Communities also supported a tax on artificial nitrogen fertilisers. The Wildlife and Countryside Link proposed that farmers be allowed two warnings before prosecution, as happens in Scotland.

Criticisms of the proposal came from three organisations. The Food and Drink Federation questioned how this would be monitored and managed and how the polluter would be identified. The National Farmers’ Union expressed concern over the ‘polluter pays’ principle” and encouraged DEFRA “to reflect on the five principles of good regulation: proportionality; accountability; consistency; transparency; and targeting” as “better” principles for the regulatory baseline. The Tenant Farmers’ Association stated that “the polluter is the ultimate consumer who is unwilling to pay the price for dealing with the consequences of their purchase decisions on the wider environment” rather than farmers, citing the change of behaviour arising from the introduction of the tax on plastic bags.

3.4 Antimicrobial resistance

The need to reduce bacterial resistance to antibiotics was set out by the Chief Medical Officer for England in 2013.²

The *Health and harmony* consultation raised the need to tackle endemic disease in animals because of the “risk to the future effectiveness of antimicrobial medicines for both animal and human use” and the consequent burden on the National Health Service. However, the consultation paper had no direct question on how agricultural policies could help address antimicrobial resistance (AMR). Despite this, 19/71 organisations commented on the need to address antibiotic use in farming and agricultural practices. Table 3 provides a breakdown of responding organisations by category.

The UK Health Forum flagged the “global crisis” of AMR, supported by both the Royal Society for Public Health and the Faculty of Public Health who highlighted the reduction of antibiotic use in livestock as “a critical step to saving our antibiotics for human use in the future.” The APPG Agroecology commented that “a reduction in cattle antibiotic use is an inexpensive and effective way to improve human health.” The National Pig Association also felt that AMR “puts the achievement of the UN’s Sustainable Development Goals related to health, agriculture, animals, environment and food directly at risk.”

A number of suggestions for how this might be achieved were given. The British Veterinary Association suggested that the new agriculture policy should be used to “further the objectives of a new 5-year antimicrobial resistance strategy.” The National Pig Association proposed that the responsible use of antibiotics be considered a public good. The Green MEPs felt that “prophylactic and metaphylactic use of antibiotics in livestock farming should be prohibited.” Eating Better felt that AMR should be one of eight principles for better livestock production.

The National Farmers’ Union (NFU) reminded DEFRA that it had previously highlighted tackling AMR as a priority area for research and innovation. The NFU provided further comments that “any additional aspirations for animal health and welfare must be based on scientific evidence that they will actually benefit the farmed animals and the businesses.” The Agriculture and Horticulture Development Board warned that “if a system was expected to capture 100% of data on antimicrobial usage it is likely that some form of regulation would be required, probably at the point of dispensing rather than on farm.”

² *UK five year antimicrobial resistance strategy 2013 to 2018* London: Department of Health, 2013
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244058/20130902_UK_5_year_AMR_strategy.pdf

Table 3: Organisations commenting on AMR

Type of organisation	Organisation
Academic	Royal Society of Biology University of Exeter Business School
Agriculture	Agricology Agriculture & Horticulture Development Board Yorkshire Agricultural Society
Animal health	British Veterinary Association National Pig Association
Environment	Friends of the Earth
Farming	English Organic Forum National Farmers' Union
Food	Eating Better Food Foundation Vegan Society
Political	APPG Agroecology for Sustainable Food & Farming Green MEPs
Professional association	Country Land and Business Association
Public health	Faculty of Public Health Royal Society for Public Health UK Health Forum

3.5 Healthy food and nutrition

28/71 organisations provided a wide range of comments related to diet, healthy food and nutrition. [Appendix 2](#) shows the breakdown by topic.

The UK Health Forum expressed concern that “the population’s poor diets are, in part, due to failures in the food, agriculture and health systems to be adequately joined up.” As a result, Eating Better expressed disappointment that the *Health and harmony* consultation is “narrowly focused on farming rather than on a broader food strategy, as its title might imply.” APPG Agroecology pointed out that “the transformation of the food and farming sectors go hand in hand” whilst the Provision Trade Federation stated that “the physical and economic health of the nation depends on secure supplies of safe, nutritious, sustainable and affordable food.” Both The A Team and Organic Farmers and Growers stated the need for a holistic future food and farming policy that works within “planetary boundaries.” The Sustainable Food Trust warned against introducing a land management system that has the potential to increase intensive farming by taking more land out of food production.

Although the National Farmers’ Union believed that food production should be “at the heart of future policy,” the Wildlife Trusts felt that farmers should be rewarded not simply

for producing more food but for producing food that contributes to the health of the population and the environment.

Comments on food were extensive and wide-ranging, covering the topics of:

- Eatwell guide
- Cost
- Food production
- Healthy & sustainable diet
- Horticulture
- Human rights
- Nutrition
- Public procurement
- Unhealthy food

Key themes to emerge around diet and nutrition focused on the need to:

- increase the range, accessibility and affordability of fruit and vegetables;
- encourage a move away from producing foodstuffs that are unhealthy and unsustainable;
- support public procurement to help shift dietary behaviours;
- use the Agriculture Bill to incentivise healthier, more sustainable food systems that improve nutrition;
- recognise that food is not a commodity but a human right;
- focus food production on the delivery of quality, healthy, sustainable food.

3.6 Food labelling

The *Health and harmony* consultation points out that “definitions on labels, such as “grass fed,” can vary between retailers.” DEFRA is therefore considering “whether providing greater clarity of information to consumers could support higher welfare production.”

It should be noted that the labelling referred to here relates only to food production methods rather than the nutritional labels that the public health system would advocate. However, there is agreement with the Tenant Farmers’ Association view of “a general lack of awareness amongst consumers about the differences in quality of the products which they are purchasing when comparing UK sourced and internationally sourced products.”

26/71 organisations commented on this aspect of food labelling. These were divided into:

Yes in some circumstances:	23/26 organisations
No: this is unnecessary:	3/26 organisations
Maybe: in some circumstances:	6/26 organisations

The Tenant Farmers’ Association felt that “poor labelling” was a contributory factor in the pressures experienced by some farmers. The Country, Land and Business Association agreed “there is a need to protect consumers from misleading marketing claims, and there may be benefits to providing clearer labelling to aid consumer choice” but added that “any

additional labelling could add to consumer confusion.” The Agricultural Industries Federation warned that the situation should be avoided where the “lack of a “best possible welfare” label implies operations at the lowest possible welfare standard.” The National Farmers’ Union made the point that any labelling system had to be consistent across England, Wales, Scotland and Northern Ireland in order not to create internal trade barriers within the UK. The NFU also felt that welfare is something that “consumers do not want to navigate at the point of purchase.”

Organisations in favour of method of production labelling felt it should be mandatory and would contribute to consumer choice, with the RSPCA commenting that it is “an effective tool in driving higher welfare purchasing behaviour.” There were calls from the National Pig Association and the RSPCA to extend labelling to processed meats such as bacon and sausages and dairy products respectively. [Appendix 3](#) shows a breakdown of responses.

3.7 Trade and standards

Most of the 71 respondents made some comments about the UK’s future trade policies. 35/71 organisations noted some issues that are also of concern to the public health system, in particular the question of how to maintain and protect the UK’s current high standards. [Appendix 4](#) provides a breakdown of responses to this specific problem.

The question of maintaining current standards was addressed through the topics of: animal health, food security, free trade agreements, legislation and regulation, standards, trade policy, and World Trade Organization (WTO) rules.

There is complete agreement between all 35 organisations who commented on trade that current standards need to be maintained and that the UK’s future trade deals should be based on these to avoid lower quality food products from being imported simply because these were cheaper. The Yorkshire Agricultural Society drew attention to UK media reports that “the government is already considering importing hormone-treated beef as the “price” of concluding a trade deal with Australia.” The Society went on to point out that such a policy would “reduce consumer choice” because the resulting price differentials would mean those consumers who are unable to afford higher prices for better quality food would have to opt for the lower quality imports. The A Team proposed that the precautionary approach be adopted on all food and farm products.

The Environment Agency, Organic Farmers and Growers and the Yorkshire Agricultural Society all underlined the interdependency of trade policy with other government policies, including health and housing but the industrial strategy and the 25 year Environment Plan in particular. The Yorkshire Agricultural Society commented that “the industrial strategy seems to suggest that the UK food and drinks sector’s strengths in terms of exporting is technological innovations in the transport and the manufacturing process, rather than [in] the food’s high welfare/environmental sustainability/food quality credentials as suggested in *Health and Harmony*.”

The Institute of Agricultural Management, National Farmers' Union, Tenant Farmers' Association, Woodland Trust, and Yorkshire Agricultural Society all emphasised the need for commonality in regulation and legislation between England, Scotland, Wales and Northern Ireland in order to prevent internal market issues developing within the UK.

Eight organisations believed that the World Trade Organization rules on agriculture may provide some support for the UK to maintain a strict adherence to high quality standards. The Green MEPs group and the National Trust both advocated using “the Green Box (defined as minimal trade distorting and with a minimal impact on production)” to protect payments to farmers, providing such payments are not price-protecting or linked to production. On this basis, DEFRA's proposed payment for public goods would seem to fit these criteria.

4. Reflection

Despite its title, and subsequent analysis by the Secretary of State for the Environment at consultation events, this white paper disappointed public health organisations. The UK Health Forum summarised the disappointment, saying that “the role of the agriculture system in supporting public health is not adequately reflected within the paper's ambition for a future agriculture policy for the UK.”

The Royal Society for Public Health pointed out that “public health is inextricably linked with food and farming policy in countless ways from water pollution to pesticide residues to access to the countryside.” The need for a future agriculture policy to focus on improving population health was supported by organisations representing food, farming, academia, and environment. The Faculty of Public Health, Food Foundation, and Friends of the Earth encouraged DEFRA to use the proposed Agriculture Bill for a whole systems approach to agriculture and human health. The National Trust, Organic Farmers and Growers and Yorkshire Agricultural Society pointed out that agricultural policies do not stand alone but must be integrated across government, and with industrial and trade policies in particular.

Although the Tenant Farmers' Association felt that public health issues lie beyond the farm gate and should not be blamed on the Common Agricultural Policy, Agricology advised the agricultural community to learn from public health crises and “address the cause rather than getting wrapped up in the solution.”

The Chartered Institute of Ecology and Environmental Management felt that “England now has a ‘once in a generation’ opportunity to design a new funding system that drives forward sustainable food production, facilitates a mass restoration of ecosystems, improves public health and promotes the public enjoyment of the countryside.” The Royal Society of Biology emphasised that “the importance of well-informed policy in plant health, and animal health and welfare for optimum public health and wellbeing cannot be understated.”

This briefing may help identify further opportunities for the public health system to establish connections with a wider set of supportive organisations.

Appendix 1: Organisations publishing a response to the DEFRA Health and harmony consultation as at 29 May 2018.

Agricology	London Wildlife Trust
Agricultural Industries Federation	National Parks England
Agriculture & Horticulture Development Board	National Pig Association
Anaerobic Digestion and Bioresources Association	National Trust
APPG Agroecology for Sustainable Food & Farming	New Anglia Local Enterprise Partnership
Association of Drainage Authorities	National Farmers' Union
Barclays	National Farmers' Union Cymru
Brightspace	Organic Farmers and Growers
British Association for Shooting and Conservation	Organic Trade Board
British Free Range Egg Producers Association	People Need Nature
British Veterinary Association	Pesticide Action Network
Campaign for Local Abattoirs	Provision Trade Federation
Campaign to Protect Rural England	Rescue Archaeology
Catapult Energy Systems	Royal Agricultural University
Chartered Institute of Ecology and Environmental Management	Royal Forestry Society
Confederation of Forest Industries (Confor)	Royal Society for Biology
Country Land & Business Association (CLA)	RSPCA
Countryside Alliance	Royal Society for Public Health
Cycling UK	Scottish Managed Sustainable Health Network
Dartmoor Preservation Association	Small Woods
Eating Better	Social Farms & Gardens
English Organic Forum	Soil Association
Environment Agency	Sustain
Faculty of Public Health	Sustainable Food Trust
Field Studies Council	Tenant Farmers Association
Food & Drink Federation	The A Team
Food Ethics Council	UK Health Forum
Food Foundation	University of Exeter Business School
Foundation for Common Land	Uplands Alliance
Friends of the Earth	Vegan Society
GM Freeze	Wellcome Trust
Green MEPs	West Sussex Growers Association
Growing Communities	Wildlife and Countryside Link
Institute of Agricultural Management	Wildlife Trusts
Institute of Chartered Accountants in England and Wales	Woodland Trust
	Yorkshire Agricultural Society

Appendix 2: Organisations' comments on diet and nutrition

Food and nutrition topic	Comments	Organisations
Agriculture Bill	<ol style="list-style-type: none"> 1. Align our agriculture policy with the Sustainable Development Goals / by enabling easy and affordable access to healthy food for all. 2. By encouraging domestic farming of lentils, peas and beans the agriculture bill can support both human health and the environment. 3. Objectives of the Bill also include a remit to support healthier sustainable diets. 4a. Should commit to pilot and create new schemes which specifically support the production and consumption of high quality, safe and healthy food [starting] with a specific focus on fruit and vegetables. 4b. Establish a set of national indicators and targets to monitor improvements in how our food system is impacting on public health. 5. Should recognise the validity of social, economic and ethical impacts of different ways of growing and producing our food. 6. Incentivise sustainable food systems that deliver nutritional security of direct benefit to the health and welfare of current and future human populations. 	<ol style="list-style-type: none"> 1. APPG Agroecology for Sustainable Food & Farming, Royal Society of Biology, and The A Team 2. Faculty of Public Health 3. Food Ethics Council and Growing Communities 4. Food Foundation 5. GM Freeze 6. Royal Society of Biology
Cost	<ol style="list-style-type: none"> 1. The Soil Association's 'Food for Life' scheme is an ideal example of how agricultural policy can be used to rapidly improve people's diets without having to be more expensive. 2. Make clear that food cannot always be cheap or become cheaper at the point of purchase if it is to be healthy and environmentally sustainable. 3. Targeted funding to support growth and distribution of indigenous fruits and vegetables at an affordable price. 4. Increasing productivity and keeping fruit and vegetables affordable and accessible for all. 5. Support for activities that make sustainably produced, fresh food available, affordable and accessible to all. 6. High quality food should be available to the UK public at an affordable price. 7. Consumers not shown much evidence of being willing to pay premia for higher environmental and welfare standards. That may also be a factor in the ongoing 	<ol style="list-style-type: none"> 1. APPG Agroecology for Sustainable Food & Farming 2. Campaign to Protect Rural England 3. Faculty of Public Health 4. Food Foundation 5. Eating Better and Growing Communities 6. Friends of the Earth 7. Provision Trade Association 8. Royal Society of Biology 9. The A Team

	<p>challenge of obesity, if making food healthier and more sustainable results in higher prices for consumers.</p> <p>8. Staple goods... should be affordable across society.</p> <p>9. Extension of the 'healthy start scheme' in which vouchers are provided for those on low income to buy fruit and vegetables.</p>	
Eatwell Guide	<p>1. Market opportunity for horticulture if [we] ate the amount of fruit and veg recommended by the Eatwell Guide.</p> <p>2. Actively promote changes in people's eating patterns to less and better meat based on the recommendations in Public Health England's Eatwell Plate.</p> <p>3. Strongly recommend that agriculture policy be guided by the Eatwell Guide's healthy eating recommendations in order to be better aligned with nutrition and public health goals.</p>	<p>1. Food Foundation</p> <p>2. Friends of the Earth</p> <p>3. UK Health Forum</p>
Food production	<p>1. Sustainable food production should be the key objective of the UK's future food and agriculture policy.</p> <p>2. Urge a reframing of what is meant by 'productivity', beyond the narrow definition of 'producing more' and instead promoting farming for positive nutrition</p> <p>3. Develop a set of national metrics and targets which would track whether our food production is moving towards the delivery of healthy and sustainable diets for everyone</p> <p>4. Farmers and growers are proud to produce the foods that sit at the heart of every healthy, balanced diet, and the NFU welcomes commitment to creating closer links between food production, health and education. Putting food production at the heart of future policy would truly capitalise on this.</p> <p>5. Support food production as locally as possible to reduce transport miles and energy use in food preservation thereby reducing climate change impacts;</p> <p>6. Environmental Land Management Scheme risks ... the separation of food production from nature conservation, result[ing] in further increases in intensification on the areas remaining in production.</p> <p>7. Farmers already receive a financial return for producing food; they should be more fairly rewarded through the market, not simply paid to grow more food.</p>	<p>1. Food and Drink Federation</p> <p>2. Food Ethics Council and Wellcome Trust</p> <p>3. Food Foundation</p> <p>4. National Farmers' Union</p> <p>5. Scottish Managed Sustainable Health Network</p> <p>6. Sustainable Food Trust</p> <p>7. Wildlife Trusts</p>

	<p>Make the measure of success for future agriculture policy one in which high quality food production is at appropriate levels and set amongst a landscape filled with biodiversity and healthy people, rather than yield of crops/hectare or a daily growth rate.</p>	
<p>Healthy, sustainable diet</p>	<ol style="list-style-type: none"> 1. Farmers should be rewarded for providing food that is healthy, sustainable and nutritious for the public. 2. A transition to healthy sustainable eating patterns with less and better meat and dairy with more plant-based eating. 3. Evidence suggests that healthy eating habits are also more sustainable 4. Provide match funding for producers who collaborate on marketing of fruit and veg aimed at driving up consumption particularly for vulnerable groups, eg Veg Power initiative with children. 5. Help farmers transition from high levels of production (particularly from intensive systems) of products we should be reducing in our diets. Support for activities that contribute to healthy sustainable diets [and] more emphasis given to reducing overall demand. 6. Ensure public money supports production and consumption of healthy produce. 7. Incentivise sustainable food systems that deliver nutritional security of direct benefit to the health and welfare of current and future human populations. 8. Healthier and more sustainable diets that include less and better meat and more veg would be promoted by integrating sustainability fully into healthy eating advice to the public. 9. Measures should be applied to increase the diversity of diets, reduce the consumption of ultra-processed foods, and ensure that fresh whole foods are as accessible and attractive as less healthy choices 10. Support farmers to produce and promote more of the foods that we need to eat more of such as pulses, vegetables, fruit and sustainable fish 11. Financial support should encourage and enable farmers to grow enough healthy food for us all. 	<ol style="list-style-type: none"> 1. APPG Agroecology for Sustainable Food & Farming and GM Freeze 2. Eating Better and Food Ethics Council 3. Faculty of Public Health 4. Food Foundation 5. Friends of the Earth 6. Growing Communities 7. Royal Society of Biology 8. Soil Association 9. The A Team 10. UK Health Forum 11. Vegan Society

Horticulture	<ol style="list-style-type: none"> 1. Horticulture is highly important in delivering produce for a healthier diet ... and can also offer additional income for farmers. 2. 17 percent of the UK's total supply of fruit & vegetables. Currently £9.2bn trade gap in fruit and vegetables. Expand and improve support for domestic production of vegetable protein crops. Widespread local vegetable and fruit production feeding into local markets would reduce food miles. 3. The production of more and diverse fruit and vegetables in the UK can be supported through subsidies. Growers of fruit and vegetables in the UK have not benefited from CAP subsidies to the same extent 4. Reinvigorate the Horticulture Sector to make easy gains on healthy and accessible food. [Eating] "seven a day" helpings of fruit and vegetables requires that UK growers need to produce at least £2.4 million tonnes more of fruit and vegetables. 5. A New Entrants Scheme, for farmers growing plant protein crops. 	<ol style="list-style-type: none"> 1. Agrigology, Soil Association and Vegan Society 2. Green MEPs 3. Growing Communities and Royal Society for Public Health 4. The A Team 5. Vegan Society
Human right	<ol style="list-style-type: none"> 1. Access to adequate food to maintain sound nutrition should be seen as a human right. 2. Request official recognition that food is not a commodity but a basic human right. 	<ol style="list-style-type: none"> 1. Green MEPs 2. The A Team
Nutrition	<ol style="list-style-type: none"> 1. One of the most important roles of agriculture is provision of healthy, nutritious food for our entire population. 2. Nutrition should be a core concept in the maintenance of societal health nationally and internationally; the sustainable production and availability of a variety of nutrient rich foodstuffs is key. 3. Improving the nutritional profile of food products should also be encouraged – for example by rewarding the production of less highly processed grain and flours and fresh fish with healthier fatty acid profiles. 4. Government could go much further to embed nutrition within the farming agenda. Establish objectives and accompanying metrics which value nutritional yield alongside calorific and economic yield. 	<ol style="list-style-type: none"> 1. Faculty of Public Health 2. Royal Society of Biology 3. Royal Society for Public Health 4. Wellcome Trust
Public procurement	<ol style="list-style-type: none"> 1. Enforcing high public-sector procurement standards for schools, services and hospitals and ensuring public money supports production and consumption of 	<ol style="list-style-type: none"> 1. APPG Agroecology for Sustainable Food & Farming, Faculty of Public Health,

	<p>healthy produce.</p> <ol style="list-style-type: none"> 2. Consultation fails to include reference to the role of public sector food procurement in supporting dietary shifts 3. Public procurement provides a major opportunity to drive change in public behaviours for sustainable consumption 4. All Public Procurement should run through a food assurance scheme, we propose the Soil Association's 'Food for Life'. 	<p>Food Ethics Council, Food Foundation, Friends of the Earth, Growing Communities</p> <ol style="list-style-type: none"> 2. Eating Better 3. English Organic Forum. 4. The A Team
Unhealthy food	<ol style="list-style-type: none"> 1. Subsidies should be removed from foods high in salt and sugar as well as meat that is intensively produced. 2. Help farmers transition from high levels of production for products we should be reducing in our diets, such as high levels of meat and dairy consumption. 3. The creation of a cheap food culture has produced major environmental and health problems, resulting in a heavy burden on the NHS, lack of cooking skills and self-confidence around food, limited engagement with fresh food. 4. There should be a shift away from producing cheap sugar. 5. Support for activities that contribute to healthy diets by reducing the health and economic cost of diet-related disease. 6. It is what happens beyond the farm gate that is the problem (eg growth of convenience foods, poor diet etc). There have been many food innovations which we are now beginning to question not least foods with high fat and sugar contents. 	<ol style="list-style-type: none"> 1. APPG Agroecology for Sustainable Food & Farming 2. Eating Better and UK Health Forum 3. English Organic Forum 4. Royal Society for Public Health 5. Sustain 6. Tenant Farmers' Association

Notes:

- policies broadly aligned with public health are flagged in blue type
- wording is verbatim from the organisation's response

Appendix 3: Organisations' comments on food production labelling

Response	Comments	Organisation
Yes	<ol style="list-style-type: none"> 1. Crucial that an improved labelling system is introduced. The public should be able to make easy and informed choices on what they want to eat. 2. Clear, effective, honest labelling which is transparent about how food is produced and processed. 3. Food labelling is vitally important in enabling UK farmers to compete fairly and in giving consumers the ability and confidence to 'buy British' 4. Polluter pays principle could also be reinforced through more transparent labelling. 5. Mandatory method of production labelling to ensure greater consistency and understanding of welfare information at the point of purchase. 6. The UK public have consistently shown their strong support for the right to choose and for robust and clear labelling of GM food ingredients. 7. Consumer choice is a public good that can only be realised through effective food labelling. 8. More robust regulation, transparency, risk assessment, and labelling for GM must be established to extend greater control over the food chain for farmers and consumers. 9. Standards and labelling ... needs to be simpler and not only indicate welfare, but also environmental standards of production and food miles. 10. Clear labelling and high standards of traceability in the supply chain are essential to protect the integrity of British production, consumer confidence in British, and help our farmers receive fair reward. 11. Make provision for labelling and marketing regulation development linking to public good outcomes. 12. Mandatory country of origin labelling requirements should be extended 	<ol style="list-style-type: none"> 1. APPG Agroecology for Sustainable Food & Farming, Faculty of Public Health, Soil Association 2. Campaign to Protect Rural England, Eating Better, Royal Agricultural University, Royal Society of Biology 3. Countryside Alliance 4. English Organic Forum, Organic Farmers & Growers 5. Food Ethics Council, Green MEPs, National Trust 6. Friends of the Earth 7. GM Freeze 8. Green MEPs 9. Growing Communities 10. National Farmers' Union 11. National Parks England 12. National Pig Association 13. RSPCA 14. The A Team 15. Vegan Society

	<p>to all imported food products to ensure that meat from countries with lower welfare standards is easily identifiable to the consumer. Labelling requirements extended to processed products such as ham, bacon, sausages and ready meals.</p> <p>13. Mandating and implementing clear, transparent, meaningful method of production labelling underpinned by validated welfare outcome measures - regulations should extend to all meat and dairy products, in the same way as they do for eggs, and also extend to labels on products that contain any animal products.</p> <p>14. Food labelling must be reformed to a mandatory and uniformed system that champions our high food standards, the Public Goods they create, and the method of production.</p> <p>15. "Products of all kinds (not just food and drink) should be clearly labelled as to whether non-human animals have been used in their manufacture in any way."</p>	
No	<p>1. We do not detect a strong appetite from retailers for any new labelling schemes. Food labels have become increasingly sophisticated combining a range of legal requirements along with brand messaging, provenance and other requirements, there is a risk of adding to confusion. Any change to labelling should be consumer led.</p> <p>2. NPA does not believe that mandatory labelling of production systems is necessary or required by the consumer. Labels are already becoming old fashioned as a way of transferring information since more brand information is now given through social media. Production method should not be used as a proxy for animal welfare.</p> <p>3. It is not always the case that labelling is able to direct consumers appropriately towards purchasing high animal welfare products in comparison to those which may have been produced to lower standards – eg beef from Argentina/Ireland/Brazil not distinguished.</p>	<p>5. Agriculture & Horticulture Development Board</p> <p>6. National Pig Association</p> <p>7. Tenant Farmers' Association</p>
Maybe	<p>1. Need to avoid situation where lack of "best possible welfare" label implies operations at the lowest possible welfare standard.</p> <p>2. Setting standards for production methods for consumer information</p>	<p>1. Agricultural Industries Federation</p> <p>2. Country, Land and Business</p>

	<p>may be desirable to allow informed choices, but it is not straightforward. The only production method that is defined in law is organic, all others are voluntary or marketing standards. There is a need to protect consumers from misleading marketing claims, and there may be benefits to providing clearer labelling to aid consumer choice. Any additional labelling could add to consumer confusion.</p> <p>3. Reinventing a new scheme or logo that would at least in part emulate the function of existing schemes would need to compete in a crowded market and offer something different and meaningful to the existing (and highly competitive) schemes. Identical regimes across all administrations.</p> <p>4. Labelling is not a substitute for robust animal welfare legislation. Products that contain egg do not have to state production method.</p> <p>5. Whilst a mandatory labelling method of production may be difficult to achieve in all sectors, there are further opportunities for standardising existing descriptors, for example with grass-fed.</p> <p>6. Poor labelling contributing to the pressures at farm level.</p>	<p>Association</p> <p>3. National Farmers' Union</p> <p>4. Royal Agricultural University</p> <p>5. RSPCA</p> <p>6. Tenant Farmers' Association</p>
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- wording is verbatim from the organisation's response.

Appendix 4: Breakdown of trade standards responses by topic

Topic	Comment	Organisation
Animal health	<ol style="list-style-type: none"> 1. History has shown that BSE and Foot and Mouth disease not only caused devastation to our domestic production but also destroyed any chance of exporting product to certain markets for many years - ... important to control imports of both human and animal feed stocks into the country. 2. At present we are unable to employ controls on personal imports of meat from any EU country. Government should focus on promoting our existing high levels of animal welfare to trading partners whilst also working to ensure good enforcement of existing regulation around food safety and traceability. 3. Vital that the Government insists on the inclusion of robust chapters on animal welfare and environmental sustainability. 4. Focus on equity of production regulations (both legal and voluntary) to protect the public good of animal welfare and a principle of continuous improvement. 5. Potential moral hazard of using public funds to prevent low levels of animal welfare as opposed to the use of regulations backed with trade restrictions against the import of food produced to lower standards. 6. More data is needed to establish whether relying on a high farm animal welfare, good food quality and sustainable UK brand alone to generate profits ... is a viable strategy. 	<ol style="list-style-type: none"> 1. Agriculture & Horticulture Development Board 2. National Pig Association 3. National Trust 4. National Farmers' Union 5. University of Exeter Business School 6. Yorkshire Agricultural Society
Food security	<ol style="list-style-type: none"> 1. Food security is achieved by a combination of adequate levels of supply and a properly functioning international trade system. around 160 countries make up a significant portion (about 12%) of our food imports. Greater self-sufficiency does not mean limiting or reducing export and imports [but] capitalising on what we're already good at and improving our ability to contribute sustainably to the global food larder. 2. International trade in food must continue to be an important part of our nation's identity but we should not rely upon it for our food security. 	<ol style="list-style-type: none"> 1. National Farmers' Union 2. Tenant Farmers' Association
Free trade agreements	<ol style="list-style-type: none"> 1. UK agricultural industry is a high-trading sector - we recommend it is given a distinct, standalone chapter within any future Free Trade Agreement. 2. When negotiating future trade deals, the Government should prioritise, animal health, animal welfare, public health and food safety and not undercut efforts to address antimicrobial resistance. 	<ol style="list-style-type: none"> 1. Barclays 2. British Veterinary Association

	<ol style="list-style-type: none"> 3. Risk of substantial supply shortages and price rises with certain products following Brexit if an FTA cannot be agreed. These higher prices would make the UK market relatively more attractive and induce trade diversion to the UK. Signing an FTA with a country with lower environmental and welfare standards than the UK presents an opportunity to enforce higher standards. 4. Advocate for the maintenance of UK-EU regulatory alignment, to avoid the possibility of trade frictions arising. 5. FTA with other non-EU countries, this must not allow in imports of products produced at lower standards, including labour standards. Any future Free Trade Agreements must include language on animal welfare. 6. If a future trade arrangement or trade deal with the EU made it easier for EU member states to import products to the UK than it would be for the UK to export to the EU, this clearly would hinder the economic viability of our sector. welcome new trade deals ... where fairness and mutuality of standards are maintained. 7. The EU and the UK currently enjoy broad equivalence on welfare and environmental standards. have the same Rules of Origin (RoO) which allows the unimpeded trade in livestock and meat products. need for clarity on how environmental equivalence will be maintained. 8. Secure the benefits for UK traders of existing EU preferential trade agreements, as well as of any preferential access for UK agri-food exports. A large amount of UK sugar imports come in under either 'Everything But Arms (EBA) arrangements with Least Developed Countries. 9. Brexit could help develop new trade deals and drive exports or help companies replace imports, but this will only be achieved if UK production is competitive in its cost base and use of resources. 10. EU-UK FTA will have to agree new rules of origin agreements and new veterinary equivalence agreements. UK should also keep the non tariff animal welfare barriers. Look at new methods of incorporating animal welfare equivalence into future trade agreements. 11. A commitment to exempt the sector from future free trade agreements - Official recognition that food is not a commodity but a basic human right. 12. New trade agreements must help us meet international environmental commitments 	<ol style="list-style-type: none"> 3. Country Land and Business Association 4. Food and Drink Federation 5. Green MEPs 6. National Pig Association 7. National Trust 8. National Farmers' Union 9. New Anglia Local Enterprise Partnership 10. RSPCA 11. The A Team 12. Wildlife Trusts 13. Yorkshire Agricultural Society
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	<p>and obligations. Environmental impact assessments should be carried out as part of any trade negotiations.</p> <p>13. No trade deal with the EU could see a reduction in the variety of foods available to the consumer. Food and drink consumer prices may also increase as a consequence of rises in production costs, tariffs and transport costs. Some quotas like, for example, those for high quality beef are already allocated wholly among major beef exporters. Quotas (available to all) are the frozen beef and manufacturing beef quotas, which will not accommodate all UK farmers' current beef exports to the EU. New trade agreements have the potential to open up markets for products farmers find difficult to sell in the UK; eg, exporting to China parts of the animal carcass (feet, some offal) not eaten by UK consumers.</p>	
Legislation / regulation	<ol style="list-style-type: none"> 1. Correct "legislative structure to deliver to the right specification and the right price" - certainty on rules of origin, standards, tariffs - food safety & welfare standards would help ease the concern on existence of nontariff and trade distorting measures. 2. Solutions to resolve difficulties in divergent legislation on GM crops must recognise and respect the views of the devolved nations. 3. Keep the non-tariff animal welfare barriers it currently has in place due to EU regulations. 4. Different approaches to regulation could also impose barriers to trade in goods within the UK. There must be frameworks in place to ensure this does not materialise [with] identical regimes across all administrations. Develop a better, more efficient, risk and science-based regulation. 5. Common frameworks in order to avert unconstrained regulatory divergence and the attendant risk of both setting up a UK internal market, and of causing difficulties in terms of securing trade deals with the EU27 and third countries. 6. It matters to every farm and food business that depends on trade within the UK single market should different standards for production methods or product standards become barriers to trade ... legally it must be agreed by negotiation rather than imposed by Westminster. 7. Debate between the UK Government and devolved administrations about the need for common frameworks has focused too much on intra-UK and international trade 	<ol style="list-style-type: none"> 1. Agricultural Industries Federation 2. GM Freeze 3. Green MEPs 4. National Farmers' Union 5. National Farmers' Union Cymru 6. Tenant Farmers' Association 7. Woodland Trust 8. Yorkshire Agricultural Society

	<p>and not .. other principles, specifically compliance with international obligations and management of common resources.</p> <p>8. Commonality is needed is in (1) ensuring compliance with international obligations, (2) allowing the smooth functioning of the UK internal market (3) in relation to the calculation of any resources provided to ensure the provision of public goods.</p>	
Standards	<p>1. Widely perceived that UK animal welfare standards are already deemed to be higher than in many of our trading partners. Identifying objectively what is meant by world class animal welfare is important.</p> <p>2. British farming should be synonymous with the highest possible standards of health, wellbeing and environmental protection, resisting any “race to the bottom” on price.</p> <p>3. Trade agreements should not weaken or lower national standards or lead to greater imports of product with much lower standards, which would displace domestic produce and lead to worse environmental and welfare effects.</p> <p>4. Gold-plating of any standards introduced as part of the new system must be avoided and food imported into the UK must meet the same exacting food safety and quality standards. No evidence that higher standards will be commercially justifiable. up to food manufacturers, retailers and consumers [to set higher standards].</p> <p>5. Require imports to meet animal welfare and environmental standards equivalent to domestic standards so as not to undermine UK production.</p> <p>6. Food labelling demonstrating high welfare and quality standards could support international trade. For example, milk that is certified antibiotic-free is in great demand by the USA. importing of agricultural goods with a heavy environmental impact should be explicitly avoided in trade deals (e.g. soya from Latin America or palm oil from South East Asia).</p> <p>7. Ensure that food trade is not sacrificed in favour of other sectors such as finance or services. Use a mutually recognised assurance standard that includes animal welfare, environmental protection and labour rights.</p> <p>8. The Balanced Scorecard must be revised to remove the caveat that allows lower standard product to be procured when UK product is found to be too expensive.</p> <p>9. Our success in the market is competing at the top of the value chain. No clarity on how to achieve high environmental animal and food safety standards in trade deals</p>	<p>1. Agriculture & Horticulture Development Board</p> <p>2. Chartered Institute of Ecology and Environmental Management, Countryside Alliance, Royal Agricultural University, Soil Association</p> <p>3. Campaign to Protect Rural England</p> <p>4. Food and Drink Federation</p> <p>5. Friends of the Earth, Organic Farmers and Growers, National Farmers’ Union Cymru, Wildlife Trusts</p> <p>6. Green MEPs</p> <p>7. Institute of Agricultural Management</p>

	<p>with countries having lower standards. UK should also keep the non-tariff animal welfare barriers it currently has, including a prohibition on importing beef produced using hormones, beef and pork injected with ractopamine, beef treated with BST and chicken washed in chlorine.</p> <p>10. Need to emphasise and promote legislative equivalence as a condition of trade - consumers do not want to navigate at the point of purchase.</p> <p>11. Many UK farmers also rely on tariffs being in place on imports from outside the EU. This protects UK farmers and their produce from being priced out of the market by imported products which are cheaper but reared to lower welfare standards than their own.</p> <p>12. International trade agreements pose risks to public health as the possibility of cheap food with lower standards is increased. This could lead to increased foodborne disease, increased antibiotic use in our food and poor animal welfare.</p> <p>13. Positive policies for import substitution to encourage displacement of imports produced to lower standards with domestic production produced to the standards to which we all agree. Need to protect our high animal welfare and environmental standards both at points of sale and at our borders.</p> <p>14. A ban on the imports of food produced to lower environmental, social and animal welfare standards than those of UK producers.</p> <p>15. If the UK government moves towards importing cheap food not produced to the UK's high standards, this will disproportionately affect poorer consumers, who are unable to choose to pay more for higher quality, high farm animal welfare and sustainable food.</p>	<p>8. National Pig Association</p> <p>9. National Trust</p> <p>10. National Farmers' Union</p> <p>11. RSPCA</p> <p>12. Royal Society for Public Health</p> <p>13. Tenant Farmers' Association</p> <p>14. The A Team</p> <p>15. Yorkshire Agricultural Society</p>
Trade policy	<p>1. Ensure existing geographical indicators for unique goods such as Welsh lamb continue to apply and future UK food products that are granted protected status must also be protected within the EU market.</p> <p>2. Keeping Britain GM free could provide a market opportunity for both domestic and overseas trade.</p> <p>3. While export and trade must be considered in terms of benefit and risk to local and national economy, these considerations should not supersede the consideration of whether our national agriculture policies support the provision of healthy foods that</p>	<p>1. Country Land and Business Association, Green MEPs</p> <p>2. English Organic Forum</p> <p>3. Faculty of Public Health</p> <p>4. Environment Agency</p>

	<p>are affordable and available to all segments of the UK population.</p> <ol style="list-style-type: none"> 4. Trade and agricultural policy is interdependent. Vital that trade policy does not undermine the government's stated aim to maintain or enhance environmental standards, or the aims set out in the 25 Year Environment Plan. 5. New policy must not lead to new barriers for trade and business between England, Scotland, Wales and Northern Ireland. 6. If the aim is food sovereignty, then the aim of policy should be to reduce food exports. If the aim is food security, then the policy should be to have good relations and a trade policy to support imports ... but not at any cost. Public funds should not be used to promote exports of products that have high carbon emissions in their supply chain. 7. Domestic production standards [need to] be squared with its international trade policy. 8. Need to ensure domestic agricultural policy is not based on exporting high quality goods to world markets, whilst we import lower quality food to feed ourselves. Use cross departmental policies to link with health, education, planning/housing, trade and the 25- year environment plan. 9. A commitment to the Precautionary Principle in all policy decisions relating to food and farm products. Ensure we are not using or importing food produced involving abused/slave labour [and] promote fair trade. 10. Align agriculture policy with the objectives and obligations of international agreements that the UK is signed up to such as the Sustainable Development Goals and the Paris Climate Change agreements. 11. Consultation Document does not adequately link food policy, industrial policy and international trade policy after Brexit. Not clear from the UK government's industrial strategy, nor its trade strategy, that such coordination between a devolved agricultural policy and these different areas of policy has been properly thought through. White Paper on Future Trade Policy suggests that whilst the UK government will promote high standards for consumer protection, labour rights and environmental protection in future trade agreements, animal welfare is only one of the possible areas that can be protected via trade agreements, whereas food quality is not listed at all. 	<ol style="list-style-type: none"> 5. Institute of Agricultural Management 6. National Trust 7. National Farmers' Union 8. Organic Farmers and Growers 9. The A Team 10. UK Health Forum 11. Yorkshire Agricultural Society
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WTO rules	<ol style="list-style-type: none"> 1. Financial incentives focused on animal welfare outcomes are trade compatible under the World Trade Organization rules. 2. To reduce the likelihood of any challenge in the WTO prefer to place [farmers payments) in the Green Box (defined as minimal trade distorting and with a minimal impact on production) - payments must be given through a government-funded scheme, which must not be linked to production nor provide price support. 3. WTO Agreement on Agriculture provides a number of possibilities to design environmental schemes that offer an adequate and attractive level of payment, while remaining compliant. 4. An integrated tariff regime to enforce the maximum permissible tariff rates under current WTO rules relating to agricultural goods and services. 5. (WTO) allow members to apply the same rules to imported products as they apply to domestic products. This will require that the standards to which we wish to aspire are enshrined in legislation. 6. Any newly formed cross-border producer organization is also subject to the competition rules in another state, and possible litigation if their practices violate the World Trade Organization's rules on agricultural subsidies. legal position of all forms of farmer collaboration can be determined before farmers should contemplate further collaborative working. 	<ol style="list-style-type: none"> 1. British Veterinary Association 2. Green MEPs, National Trust 3. National Farmers' Union 4. Organic Farmers and Growers, The A Team 5. Tenant Farmers' Association 6. Yorkshire Agricultural Society
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