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## Marks & Spencer response to the European Commission consultation on Sustainable Food Systems

### 2. Defining Sustainable Food

There are many different definitions of 'sustainable food', and this issue often emerges as an important starting point for discussion. What do you or your organisation think ?

*Sustainable food is an aspiration to meet all the social and economic 'needs' required from food production whilst also achieving the minimum environmental impact (i.e. the capacity for continuance). This includes ensuring the availability of high quality, affordable and nutritious food to consumers.*

*In practice, however, there are direct tensions across many of these social and economic 'needs' as well as with environmental impacts.*

*Improvements to one or more of the most dominant 'needs' or 'impacts' are prioritised to achieve more sustainable food. This is the approach we have taken through our target for all M&S Food products to have a least one Plan A (sustainability) quality by 2020.*

*It should be noted, however, that even if all major social and environmental hotspots are addressed there will still be compromises and few food production systems are ever likely to be to 100% sustainable.*

***This means that there is no 'silver bullet' solution and improvements to more sustainable food will be achieved by addressing key social and environmental 'hotspots' against local, national and EU and global policy objectives.***

Which of the following issues do you think should be considered as falling within the scope of a strategy on the sustainability of the food system? (You may select more than one).

*All social and economic needs as well as environmental impacts have to be considered as falling within the scope of sustainable food production. This should also include consideration of the benefits and disadvantages resulting from different production systems such as organic, genetic modification, high animal welfare regimes and intensive agriculture and livestock farming (i.e. a much wider list than suggested by the Commission).*

### 3. Moving towards a more sustainable food system - identifying and assessing policy options

The Commission has identified a number of potential actions that could be targeted for improving the sustainability of the food system. The aim of this consultation is to seek your views on how and why these actions might be prioritised and who would be best placed to take them forward. You will also be given the opportunity to propose other actions, and explain how your preferred options could be implemented.

The actions fall into the following categories:

- 3.1 Better technical knowledge on the environmental impacts of food;
- 3.2 Stimulating sustainable food production;
- 3.3 Promoting sustainable food consumption;
- 3.4 Reducing food waste and losses;
- 3.5 Improving food policy coherence.

#### 3.1. Better technical knowledge on the environmental impacts of food products (score a to e)

How effective do you think the following actions could be in improving our technical knowledge of the environmental impacts of food products?

-Develop a standardised methodology for measuring the environmental impacts of food products.

**C- Not particularly.** *It is important to increase knowledge about the points in the value chain where impacts occur and the relative scale of these impacts. This knowledge will then help to direct EC policy and industry actions. However, as long as the methodologies used are credible and fully explained we see little benefit in developing a new competing EC standardised methodology.*

-Make data on the environmental impacts of food more transparent and accessible.

**B- Fairly.** *Data will help to describe the type and scale of impacts but not directly result in improvement. Our experience to date is that in some cases data only serves to illustrate conflicts, for example, one product may have a high carbon footprint whilst a competing product is low carbon but with a high water footprint. The choice is then down to which impact considered to be most valuable? Or do you try to make improvements to both? Consumers will not be able to interpret or act on much of this information and initially the aim should be to make it accessible to stakeholders who can use it to develop policy and action improvements.*

-Develop technical guidance on how to identify more sustainable food products

**A-Very.** *Guidance to help stakeholders develop policy and action improvements is proving to be very effective within The Sustainability Consortium and the UK's Product Sustainability Forum. Even in summary form, however, this guidance will generally be too complex for use by consumers.*

Develop sustainability criteria for specific food products.

**B- Fairly.** *For some food, for example fish, it is possible to develop relatively simple sustainability criteria. For most types of food, however, criteria will be necessarily complex and involve some elements of compromise or prioritising of impacts based on local, national, EU or global needs.*

Quantify in economic terms, the environmental and social costs associated with food products or diets (i.e. any hidden costs or 'externalities')

**A-Very.** *Food sustainability strategy should include consideration of all social, economic and environmental impacts. Expressing these in financial terms is one way of making them more comparable but there will still be a requirement to prioritise and compromise across social and economic needs and reducing environmental impacts. Once considered, improvements can only be made by addressing a small number of priority impacts.*

Do you think that any specific food product categories should be prioritised for action? If so, please specify the product group and explain why this should be seen as a priority.

*There are already a large number of global and national schemes which have identified priorities based on the scale of impacts. These will include soft drinks, commodity crops, dairy and livestock production.*

**At what level do you think these actions would be best taken forward?**

-Develop a standardised methodology for measuring the environmental impacts of food products.

**A- Global.** *We advocate an EU quality to control being applied to a wide range of possible methodologies rather than the development of a new EU-only approach.*

-Make data on the environmental impacts of food more transparent and accessible.

**A- Global.**

-Develop technical guidance on how to identify more sustainable food products

**A-Global. .**

-Develop sustainability criteria for specific food products.

**C- National.** *For some, example, some member states may award greater priority to affordability, animal welfare, social quality or water conservation than others.*

-Quantify in economic terms, the environmental and social costs associated with food products or diets (i.e. any hidden costs or 'externalities')

**B-EU.**

Which out of these actions (including any of your suggestions) would you give the highest priority for the European Commission to take forward, and why?

1. Make data on the environmental impacts of food more transparent and accessible (*necessary to develop guidance*)
2. Develop technical guidance on how to identify more sustainable food products (*to inform policy and actions*)
3. **NOT** Develop a standardised methodology for measuring the environmental impacts of food products *but instead quality approve a range of available credible methodologies to enable data to become available as soon as possible.*

In terms of stimulating more sustainable food production, how effective could it be to undertake actions to promote/support the following?

*The eight proposed actions (including organic, regional, high animal welfare, seasonal produce and sustainable raw material certification) all have social and / or environmental benefits but most only address a relative small number of impacts.*

*Only multi-stakeholder raw material sustainability certification schemes can be seen to address a more comprehensive range of impacts.*

Do you have any other proposals for actions aimed at helping to make food production more sustainable? If so, please specify here.

*The benefits and disadvantages of all types of food production must be considered equally and the resultant impacts quantified and compared to local, national, EU and global policy aspirations before decisions are made to promote one form of food production over another.*

At what level do you think these actions would be best taken forward?

-Regional, wholesale markets.

**D-Local**

-Seasonally produced food

**F-Retailer**

-Diversification of cultivated species.

**C-National**

-Productive, intensive agriculture.

**C-National**

-Extensive, integrated agriculture.

**C-National**

- Organic production.

**C-National**

-Sustainable sourcing of key food commodities.

**A-Global**

-Higher animal welfare standards.

**B-EU**

Which out of these actions (including any of your suggestions) would you give the highest priority for the European Commission to take forward, and why?

1. Sustainable sourcing of key food commodities.

### 3.3 Promoting sustainable food consumption

In your view, how effective could the following actions be in promoting sustainable food consumption?

Agreeing a common set of guiding principles of what constitutes 'sustainable' diet

**B- Fairly.** *We are participating in a UK programme managed by the British Retail Consortium and Institute of Grocery Distribution to address this issue. Whilst it is possible to define an ideal diet from a nutritional perspective the challenges of addressing other social and economic needs as well as environmental impacts will still be subject to a prioritisation of impacts. Consequently, such a set of guiding principles will be 'high level' and require the development of more detailed local, national, EU and global actions before they are suitable for accessible communication to the majority of stakeholders.*

Develop ideas for food labelling schemes and/or on-package information highlighting more sustainable choices.

**D- Not all.** *Whilst nutritional information is already clearly labelled, most sustainability addresses a limited number of social and / or environmental impacts to show improvement to a specific 'hotspot' impact. It is unreasonable to believe that consumers will be able to interpret this competing information to make an informed decision.*

Run information campaigns on the environmental impacts of different food choices.

**B- Fairly.** *But only after the benefits and disadvantages of competing systems have been evaluated and compared to policy priorities.*

Promote more sustainable food choices in retail outlets by increasing their availability/accessibility.

**B- Fairly.** *We believe that all products should be made more sustainable but that there will still be an opportunity to market products which prioritise particular impacts such as organic (soil quality) or Fairtrade (premium payments to growers) to those customers who wish to support them.*

Assess the scope for using personal technology for accessing information, e.g. smart phone apps, bar code readers, etc

**B- Fairly.** *In reality only a small proportion of customers actively seek out this information. New forms of technology is one way of making this information available but there is still a requirement to identify and prioritise impacts against policy aspirations before consumers can be 'advised' about the options that best meet their needs.*

Develop and encourage the use of Green Public Procurement guidelines, to help public bodies (or private organisations) purchase food sustainably.

**B- Fairly.** *Though the same caveats about evaluating the benefits and disadvantages of competing systems against policy priorities still applies.*

## At what level do you think these actions would be best taken forward?

Agreeing a common set of guiding principles of what constitutes 'sustainable' diet

**B- EU.**

Develop ideas for food labelling schemes and/or on-package information highlighting more sustainable choices.

**G- Not needed**

Run information campaigns on the environmental impacts of different food choices.

**B- EU. *But only after the benefits and disadvantages of competing systems have been evaluated and compared to policy priorities.***

Promote more sustainable food choices in retail outlets by increasing their availability/accessibility.

**G- Not needed.**

Assess the scope for using personal technology for accessing information, e.g. smart phone apps, bar code readers, etc

**G- Not needed. *Will be developed by industry in response to consumer demand.***

Develop and encourage the use of Green Public Procurement guidelines, to help public bodies (or private organisations) purchase food sustainably.

**C- National. *In order to reflect national sustainability priorities.***

Which out of these actions (including any of your suggestions) would you give the highest priority for the European Commission to take forward, and why?

1. Agreeing a common set of guiding principles of what constitutes 'sustainable' diet (*but only after the benefits and disadvantages of competing systems have been evaluated and compared to policy priorities*)

## 3.4. Preventing and reducing Food Losses & Food Waste

How effective do you think the following actions could be in preventing and reducing food losses & food waste?

-Develop/disseminate consumer information on avoiding over-purchasing.

**B- Fairly. *Activities to promote menu and serving planning have proven to have had some success in the UK.***

-Develop/disseminate consumer information on the meaning of food date labels. ('best-before', 'use-by', 'sell-by')

**B-Fairly.** *We understand from research conducted in the UK by WRAP that consumers find current food date labelling complex and we are taking steps to simplify this. However, we still believe that consumers will make the decisions based on the date shown irrespective of the sort of label used.*

-Develop/disseminate consumer information on better storage of food.

**A-Very.** *We believe this is a very important action. Many consumers automatically remove packaging designed to maintain the quality of the product and often store inappropriately e.g. bananas in fruit bowls and bread in the fridge.*

-Develop/disseminate consumer information on more sustainable food preparation and use of leftovers.

**B-Fairly.** *This approach has proven to have had some success in the UK –though calling it as ‘sustainable food preparation’ may not be helpful.*

-Establish new education campaigns on food waste prevention aimed at children.

**B-Fairly.** *This is an approach currently under development in the UK.*

-Establish new education campaigns on food waste prevention aimed at adults.

**A-Very.** *The UK’s Lover Food, Hate Waste campaign has succeeded in savings over 1million tonnes of domestic food waste a year.*

-Facilitate the exchange of good practices on food waste prevention and reduction activities at all levels: producers, retailers as well as local, regional and national authorities.

**A-Very.** *The UK’s Courtauld Commitment has helped to reduce supply chain food waste by around 8% (up to 2011) by disseminating best practices.*

-Encourage best-practice in relation to food date labels by food business operators to minimise wastage.

**B-Fairly.** *There are a number of quality, system and format factors which influence date labelling decisions and sharing ‘views’ may not necessarily result in changes which minimise waste.*

-Develop EU Food Donation Guidelines for food donors and food banks on how to comply with the EU Food Hygiene legislation (types of food suitable for donation, conditions for transport and traceability, legal liability, etc.)

**C-Not particularly.** *Whilst providing a potentially useful point-of-reference we do not believe that this would result in reductions to food waste.*

-Agree a common EU definition of food waste, classifying products as food, feed or waste etc. as appropriate.

**A-Very.** *Food which does not serve its primary intended purpose is often considered as waste when in reality it performs a vital secondary use such as juicing (fruit), animal feed and feedstock for anaerobic digestion.*

-Develop a standardised methodology for collecting and reporting data on food waste to ensure data comparability across Member States.

**A-Very.** *As above.*

-Introduce reporting requirements on food waste.

**B-Fairly.** *Many companies already report waste data where this is considered to be material but we believe that improved transparency will help to drive improvements.*

-Set binding targets for food waste prevention.

**D-Not at all.** *We do not believe that such a target would be practicable or enforceable. Food already has a high (and increasing) financial value incentivising actions to reduce waste.*

**At what level do you think these actions would be best taken forward?**

-Develop/disseminate consumer information on avoiding over-purchasing.

**F- Retailer.**

-Develop/disseminate consumer information on the meaning of food date labels. ('best-before', 'use-by', 'sell-by')

**C-National.**

-Develop/disseminate consumer information on better storage of food.

**C-National.**

-Develop/disseminate consumer information on more sustainable food preparation and use of leftovers.

**F- Retailer.**

-Establish new education campaigns on food waste prevention aimed at children.

**C-National.**

-Establish new education campaigns on food waste prevention aimed at adults.

**C-National.**

-Facilitate the exchange of good practices on food waste prevention and reduction activities at all levels: producers, retailers as well as local, regional and national authorities.

**B-EU.**

-Encourage best-practice in relation to food date labels by food business operators to minimise wastage.

**B-EU.**

-Develop EU Food Donation Guidelines for food donors and food banks on how to comply with the EU Food Hygiene legislation (types of food suitable for donation, conditions for transport and traceability, legal liability, etc.)

**G-Action not needed.**

-Agree a common EU definition of food waste, classifying products as food, feed or waste etc. as appropriate.

**B-EU.**

-Develop a standardised methodology for collecting and reporting data on food waste to ensure data comparability across Member States.

**B-EU.**

-Introduce reporting requirements on food waste.

**G-Action not needed.**

-Set binding targets for food waste prevention.

**G-Action not needed.**

Which out of these actions (including any of your suggestions) would you give the highest priority for the European Commission to take forward, and why?

- Facilitate the exchange of good practices on food waste prevention and reduction activities at all levels: producers, retailers as well as local, regional and national authorities.
- Encourage best-practice in relation to food date labels by food business operators to minimise wastage.
- Agree a common EU definition of food waste, classifying products as food, feed or waste etc. as appropriate.
- Develop a standardised methodology for collecting and reporting data on food waste to ensure data comparability across Member States.

**In your view, how effective could the following actions be in providing better policy coherence for the production and consumption of food?**

-Perform a comprehensive review of relevant food policies (International/EU/National/local) to check that they are aligned with each other, that they are coherent, and are in line with agreed sustainability goals. (Also known as a 'fitness check')

**A-Very.** *But only after the benefits and disadvantages of all competing food systems have been evaluated.*

-Support national and local food system governance by sharing good practices / provide guidance on implementing sustainable food strategies.

**B-Fairly.**

Identify environmentally harmful subsidies (EHS) in the food sector.

**B-Fairly.** *As part of evaluating all the social, economic and environmental benefits and disadvantages of all competing food systems.*

Establish new coordination bodies (or reorganise existing bodies) to provide coherence on in the field of food sustainability.

**D-Not at all.**

Yours Faithfully

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