The Right Hon. Steve Barclay MP,

Secretary of State for Environment, Food and Rural Affairs

Noble House, 17 Smith Square, London SW1P 3JR

7 December 2023

Dear Secretary of State,

We would like to welcome you to your position as Secretary of State for the Environment and Rural Affairs. Your brief bringing together food, farming and a healthy environment is fundamental to this Government's commitment to leave the environment in a better place than it found.

We are writing on behalf of CLEAR, including the Sustainable Food Trust and Compassion in World Farming as members. CLEAR is a consortium of over 50 organisations calling on the Government to implement regulatory change that will support the UK food system transitions to sustainable farming[1] and meeting the nation's net-zero by the year 2050 commitment [2]. Farm-centred method of production data is fundamental to a transparent mandatory food labelling system that creates a level playing field, encourages cooperation and innovation in the food sector, supports businesses in communicating the sustainability of their food products, and encourages producers to adopt more environmentally beneficial practices.

As such, we welcome the government's commitment to consider a mandatory methodology for eco-labelling of foods. Furthermore, we welcome that, as part of the UK Government's Food Strategy, the Food Data Transparency Partnership (FDTP)[3] was tasked to develop proposals for an eco-labelling system that includes a mandatory methodology, with a view to voluntary adoption across the UK food industry." The FDTP's ambition is to work toward a public consultation by the end of 2023.

We are writing now to share our significant concerns regarding the recently released recommendations for eco-labelling methodology from the food sector membership group, the Institute of Grocery Distribution (IGD). While some of our organisations have been consulted in the development of these recommendations, the outputs do not reflect our input provided to

[1] DEFRA (2020) The Path to Sustainable Farming: An Agricultural Transition Plan 2021 to 2024, https://assets.publishing.service.gov.uk/media/60085334e90e073ec94cc80b/agricultural-transition-plan.pdf

[2] Gov.UK (2021) Net Zero Strategy: Build Back Greener, https://www.gov.uk/government/publications/net-zero-strategy

[3] Gov.UK (2023), https://assets.publishing.service.gov.uk/media/65045b146771b90014fdab63/Eco_Working_Group_Terms_of_Reference.pdf

the process and furthermore, we consider that these recommendations, if enacted, could confuse and mislead consumers and potentially create unintended environmental outcomes.

To provide context, the IGD (Institute of Grocery Distribution) was "approached by industry in 2021 and asked to help mobilise UK food businesses to develop a harmonised solution to environmental food labelling" [4] with two objectives:
- To help consumers make more sustainable purchasing decisions by providing transparent information about the environmental impact of products.
- To enable business decisions around supply chain efficiencies and sourcing by providing more transparent information about the environmental impact of supply chains.

Our message is simple: the current IGD recommendations fall far short of achieving these outcomes and potentially could mislead consumers regarding the sustainability of their food purchasing choices. An eco-label is only as useful as the quality of the evidence supporting it. Essential criteria for sustainability are simply absent from IGD's recommendations. We therefore urge the government to underpin any eco-label with a robust and comprehensive sustainability assessment methodology.

Further, we are concerned that the eco-label should be overseen by effective multi-sector governance. IGD's current recommendations provide significant potential for industry domination of the governance model and its steering advisors. The food industry should not be allowed to self-regulate on an issue of such significant societal importance. We urge you to ensure that the development of the rules, regulations, and governance of environmental labelling should be led by the government with cross-sector cooperation between the government, industry and representatives from the third sector.

The IGD initiative has been led by major food industry businesses. While other organisations have been consulted, crucial points have been overlooked. Specific issues are highlighted here:

1. In aiming for harmonisation, the methodology has 'dumbed down' the data behind the label scoring to just four basic criteria that fall far short of enabling consumers to understand the environmental impacts of their food or to enable them to make meaningful choices.
2. Missing measures/ blindspots: despite stating that it takes a planetary boundaries approach to determine the impact categories, biodiversity and chemical pollution/ ecotoxicity such as pesticides (novel entities[5]) which have passed their safe operating boundaries are prominently absent.

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[4] IGD (2023) Environmental labelling for the UK food industry
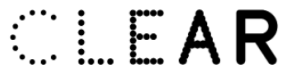https://www.igd.com/Social-impact/Sustainability/Environmental-labelling-for-the-UK-food-industry
[5] Rockström, J., Gupta, J., Qin, D. et al. (2023) Safe and just Earth system boundaries. Nature 619, 102–111 . https://doi.org/10.1038/s41586-023-06083-8

3. Missing measures/ blindspots: any measure of animal welfare is also absent. It is not possible to consider livestock systems' sustainability without the inclusion of animal welfare. If animal welfare is not included in an ecolabel, it would need an additional welfare label to be present concurrently to enable consumers to make meaningful choices.

4. In the methodology, land use is used as a proxy for biodiversity. This is misleading, especially for more diverse regenerative UK farming systems. This could lead to perverse consequences such as biasing an ecolabel against lower intensity pastured systems and rotational cropping that reduce reliance on fertiliser and pesticides while restoring nature. This approach to biodiversity also appears to run counter to the DEFRA's own mandatory guidance on biodiversity assessment[6], such as biodiversity net gain used in the planning sector.

5. The methodology does not appear capable of recognising the value of (and may well bias against) products that have been produced in ways that reflect the government's own sustainable farming practice incentives such as ELMs (such as the value of diverse grasslands and herbal leys).

6. The methodology is inherently biased to deliver positive outcomes for industrial and intensified production due to its focus on input efficiencies. Again, on this basis, it appears incapable of addressing the diverse benefits of mixed, rotational farming systems or those that are designed to deliver nature restoration concurrent with food production.

7 The methodology does not appear to incorporate the assessment of the state or health of the ecosystems it assesses.

8. Whilst the focus of a harmonised approach to eco-labels is to support consumer choices, a systemic approach needs to include helping and enabling businesses to develop data that supports holistic environmentally and socially sustainable supply chain sourcing decisions (*not just carbon or efficiency*) and enables farmers to improve their practices over time.

9. However, we are encouraged by IGD's recent conclusion that there is not sufficient evidence to proceed with the current industry use of representative average data relating to environmental impact. Data needs to capture the real situation on the ground, reflecting the context, and consequent variability, of farming and land management practices and their biophysical contexts.

The tools and methodology to underpin comprehensive and robust eco-labelling already exist. For example, the Global Farm Metric[7] has been designed through years of multi-stakeholder consultation and co-creation across the farming sector, food industry and NGOs. The Global

[6] Gov.UK (2023) Guidance: calculate biodiversity using the biodiversity metric, https://www.gov.uk/guidance/biodiversity-metric-calculate-the-biodiversity-net-gain-of-a-project-or-development

[7] Gobal Farm Metric (2023) About the Global Farm Metric, https://www.globalfarmmetric.org

Farm Metric provides both a framework and principles for a genuinely holistic sustainability assessment methodology, and a harmonised metric. It is currently being trialled extensively in the UK, (including ELMs pilots}, the United States and Australia. It has widespread influence with major national and international environmental assessment frameworks such as the international food industry Sustainable Agriculture Initiative (SAI) Platform[8] and the Regen 10 framework[9] launched at COP28. This metric and methodology demonstrate how it is possible to develop a meaningful and robust picture of on farm risks and performance across a range of environmental and social outcomes.

CLEAR has also commissioned research, partnering with the University of Hertfordshire and steered by a multi-sector advisory group (including a staff member of the FDTP), to examine the qualities, methodologies and robustness of a wide range of eco-labels in the UK and beyond. This will be submitted to DEFRA in July 2024. We hope this research will contribute to your review of eco-labelling. We also ask that CLEAR be included as a member of the Food Data Transparency Partnership, due to its broad civil society membership and demonstrable interest and expertise to represent agroecology.

In conclusion, we welcome the government's commitment to consider a mandatory methodology for eco-labelling of foods. We invite the government to ensure that method of production underpins any evaluation of food's environmental impact. That means incorporating methods to characterise and evaluate different farming systems, alongside a robust and comprehensive measurement of environmental impact.

We would welcome the opportunity to discuss this further with you and your team and to support the government's process in any way we can.

Yours sincerely,

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[8] SAI (2023) A Global framework for Regenerative Agriculture,
saiplatform.org/regenerative-agriculture-programme
[9] Regen10 (2023) What we do, https://regen10.org/what-we-do/