



The Government Chemist

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Draft London Food Strategy  
SME, Food and LEAP Team, DEE  
PP 19A  
City Hall  
The Queen's Walk  
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e: londonfood@london.gov.uk

5 July 2018

Dear Sir / Madam,

### **Re: Healthy and Sustainable Food for London - Draft for Consultation**

My remit as UK Government Chemist focuses on food. I am responsible under certain Acts of Parliament<sup>1</sup> for providing independent analytical measurement and expert opinion to avoid or resolve disputes over scientific data which arise between local authorities and the food businesses they regulate.

My public remit also covers wider advice to UK government and other affected parties on the role of analytical measurement in effective policy, standards and regulations. My staff liaise with regulatory services involved in sampling, analysis and product testing linked to the investigation of alleged non-compliances.

As an office holder with responsibilities under the above regulations I am pleased to be able to respond to this consultation.

I welcome the production of the [draft food strategy for London](#) and the opportunity to provide input to its consultation.

In terms of more general comments to the strategy, the Mayor's foreword acknowledges the central contribution food and drink makes to our culture and society as a whole, through the aspects of health, wealth and happiness. It highlights its role in building stronger communities, in provision of skills and jobs, and the need for sustainable solutions. It suggests a holistic end-to-end approach including food waste and re-cycling, and the need for transport and air quality considerations. Importantly, it recognises the need for a change in culture away from a 'blame culture' to one which better balances individual freedom and our wider food environment.

The foreword, along with the introduction, highlights a number of drivers behind the need for a food strategy for our city; but a number of others could also be articulated. These additional drivers may include our:

- Increasing ageing demographics
- Increasing numbers of people with food allergies and intolerance<sup>2,3</sup>

<sup>1</sup> <https://www.gov.uk/government/publications/government-chemist-annual-statement-of-statutory-scope-2015--2>.

<sup>2</sup> Managing Food Allergens in the U.K. Retail Supply Chain, Michael Walker et al, Journal of AOAC International, Volume 101, Number 1, January-February 2018, pp. 45-55(11).

<sup>3</sup> Flawed food allergen analysis—health and supply chain risks and a proposed framework to address urgent analytical needs, Michael Walker et al, The Analyst 141, November 2015. DOI: 10.1039/c5an01457c.



- The role that food (meat, fish & shellfish and vegetables & crop) plays in the spread of antimicrobial resistance<sup>4</sup>
- Increasing urbanisation and reliance on pre-prepared food and eating out
- Need to do more with less money through technological development
- Changing consciences and behaviours affecting our food and drink choices, such as buying on-line and our increasing social media culture of wanting and sharing experiences around food and drink consumption
- Increasing attention to well-being and what it means to us as individuals, through food choices, personalized diets and focus on nutrition.
- Increasing consumer need for information on provenance for a range of different reasons including environmental, welfare, ethical sourcing, and food preferences etc.
- Need for an end-to-end, systems based food strategy.

The strategy would benefit from prioritisation and associated timings for the identified actions. Identification of systems for monitoring progress against the strategy would improve its impact.

Food that is safe and properly labelled to afford choice is the responsibility of the food producer or seller. But there is a public expectation that these will be policed. This is done through intelligence, regular inspection, sampling and testing; the Government Chemist is the final analytical arbiter in case of dispute between a Food Business Operator and a local authority. The food strategy for London should therefore acknowledge the continued support for such an enforcement system that combines an audit-based approach, together with a continued sampling and analysis surveillance programme.

In specific response to the consultation questions:

Q1. The current priority areas represent one way of identifying the parts of the community where the strategy is to be directed. Perhaps more focus could be included on our ageing society and the importance of the link between good nutrition (nutrient security<sup>5</sup>) and health, education and social care.

This approach though leaves key pillars or more common themes that run through each priority area and so consideration should be given to representing identifiable strategic objectives against these criteria instead. This would then allow identification of the measures of success (see response to Q2 below), which are currently less well articulated.

The key pillars appear to be the current and future workforce, sufficiency and diversity of safe and nutritious products, markets and customer (which helps build/maintain resilience of the sector) and a supply chain transformation<sup>6</sup>, delivered at an individual, organisational and/or community level.

Focus could therefore be on themes, such as:

- Stewardship around sufficiency of supply, provenance, safety and quality, so culturing a collective managed responsibility and trust

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<sup>4</sup> Chief Scientific Adviser's Science Report, Issue four: Antimicrobial resistance in the food supply chain: <https://www.food.gov.uk/sites/default/files/media/document/csa-amr-report.pdf>.

<sup>5</sup> [NNEdPro](#) Global Centre for Nutrition and Health - a not-for-profit global think-tank, training academy and knowledge network (including a research lab consortium), NNEdPro provides a gateway to individuals and organisations interested in opportunities to improve nutrition and health via education, research, evaluation and advocacy.

<sup>6</sup> The Global Food Security Programme has commissioned the University of Lincoln to undertake an independent review on the application of blockchain technology to food supply chain assurance; the report is to be published imminently.



- Collaboration, rather than competition, to make the most of innovation and our excellent diversity of product offering, as well as supply chain productivity
- Education
- Shared experience/progress and best practice guidance, helping smaller businesses and start-ups achieve good survival and growth rate

Each theme could be underpinned by a supportive fiscal regime, perhaps centred on skills, new (healthy) product intervention, marketing/advertising etc.

In place of 'reducing food insecurity', the strategy should focus on 'measures that improve food integrity and security'.

Q2. Whilst laying out a framework for considering a future food system for our city and including a number of laudable actions, the strategy could benefit from more tangible targets and measures of success of the identified actions. Such measures of success, whilst not comprehensive, could be based on:

- Productivity gains
- Change in consumer behaviour
- New products and processes brought to market
- Business start-up and survival rates
- Investment in process improvement and innovation
- New workforce entrant and retention rates
- Diversity of workforce and product base.

And benchmarking with other international cities.

Q3. A considered view is that a ban on advertising food and drink may be seen as too much of a 'nanny state' intervention. Rarely are such interventions effective alone<sup>7</sup>.

It is also not solely a TfL Estate issue; as a parent myself, I am only too aware of within-store marketing through 'end-of-aisle' and 'check-out' positioning. So, whilst perhaps part of the solution, the most efficient way to address unhealthy foods and drinks is to create a culture that offers (healthy and affordable) alternatives and so the corresponding rejection of unhealthy products. The Mayor and his team should seek to work with the UK British Retail Consortium to effect the required change in supermarket product placement.

Q4. The Government Chemist role was created in 1909, to ensure the then Laboratory of the Government Chemist could work independently of the Inland Revenue department (which provided staff to the Laboratory) and the Board of Customs and Excise (which controlled it).

Appointed by the UK Department for Business, Energy and Industrial Strategy (BEIS), the Government Chemist today oversees the statutory function of referee analyst, resolving disputes over analytical measurements, particularly in relation to food regulatory enforcement. It is fundamental to providing an independent voice for sound analytical measurement science and preventing miscarriages of justice.

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<sup>7</sup> For example, Quebec's law passed in 1980 restricting junk-food marketing to kids was the first of its kind, banning fast food marketing aimed at children under 13 in print and electronic media. Fast-food expenditures subsequently decreased 13 percent. In 2016, it was reported that while the rest of Canada has seen a drastic increase in obesity among children, Quebec maintains the lowest child obesity rate. Work needs to be done to establish what other interventions were introduced in Quebec to achieve this result.



The Government Chemist also promotes analytical science and technology, and provides advice to Government on policy, standards and regulation based on research carried out by him and his team.

Q5. As the Government Chemist, I would be only too happy to offer further input to finalise the London food strategy, either individually or as a collaborating interested party, and even as part of the London Food Board where there is no conflict with my statutory role as Government Chemist.

Q6. At one level, the strategy appears inclusive, although it is heavily focussed towards the consumer with less explicit reference to existing initiatives that support the strategy and a number of those interested stakeholders already party to them. For example, but not exclusively, these may include other food industry controllers such as the Government Departments beyond Defra (such as Food Standards Agency, Department of Health, Food Standards Scotland and BEIS (which funds the UK Government Chemist role) and the major food producers, food suppliers and food service providers (either individually or through their Trade Associations or Food Networks). The National Food Crime Unit and the Scottish Food Crime and Incidents Unit will also play a role in helping prevent food crime and food fraud thereby supporting consumer choice and trust in the food they buy.

The food and drink sector must link with other sectors, such as life sciences, transport and tourism, to fuel sales and grow a collective enhanced reputation. The different parts of the supply chain must work more effectively with each other and must share intelligence more effectively<sup>8,9</sup> for the benefit of us all. It would be beneficial if sources of support are more easily identifiable and accessible.

I think that collaboration is key to the success of the London Food Strategy.

I am fully supportive of the Mayor's initiative and look forward to the implementation of the strategy, post-consultation.

In the meantime, if I or my team can be of any assistance then please do not hesitate to contact me.

Thank you for the opportunity to comment.

Yours faithfully



**Julian Braybrook**  
**The Government Chemist**

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<sup>8</sup> [Food Industry Intelligence Network](#) (fiin) - was established by industry technical leaders to share intelligence on food authenticity and traceability.

<sup>9</sup> The [Food Authenticity Network](#) is a free, open access resource that provides information related to food authenticity testing and food fraud mitigation in one convenient location.