

Northern Ireland Food Strategy Framework

Food at the Heart of our Society - A Prospectus for Change Public Consultation Document 2021

Comments by

Northern Ireland Environment Link

19th November 2021

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 63 Full Members represent 190,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further, we would be happy to do so.

Malachy Campbell
Senior Policy Officer
Northern Ireland Environment Link
89 Loopland Drive
Belfast
BT6 9DW
P: 028 9045 5770
E: info@nienvironmentlink.org
W: www.nienvironmentlink.org

Northern Ireland Environment Link is a Company limited by guarantee NI034988 and registered with The Charity Commission for Northern Ireland NIC10107

Q1 Do you agree with taking a food systems, whole of government approach through a NI Food Strategy Framework?

NIEL agrees with this whole of government approach as it seems clear that an integrated, cross departmental approach is needed in order to better manage our food systems, better protect our environment and improve the health of our people.

Q2. Please outline your views on taking a Food Systems “whole of government” approach through a Northern Ireland Food Strategy Framework?

Northern Ireland Environment Link welcomes the proposed “whole of government” approach outlined under the six priorities, working with all relevant stakeholders to develop a strategic long term focused food strategy for Northern Ireland. The six priorities outlined in section 5(b) are a positive step in recognising the interconnected complexities and how a “whole of government” approach is needed in order to bring about the necessary changes to our food system. Delivery on the ground will need the full support of a number of departments which will need to lead by example and buy in from stakeholders which should be supported through targeted communication strategies.

NIEL agrees that if management of the systems that produce the food we eat is to be truly sustainable it has to align with and contribute to the achievement of the Sustainable Development Goals (SDGs) and so needs to be based on an integrated approach which balances environmental, social and economic factors and that there needs to be a much greater consideration of the relationship to and impacts upon the health of our people and our environment in the production of food in Northern Ireland. NIEL believes that the NI Food Strategy Framework should seek to achieve a sustainable food system based upon the FAO’s definition of such a food system¹. This is explored in more detail in our response to Q5.

NIEL supports the response of the Belfast Food Network (BFN) which provides greater detail in relation to the management of food in Northern Ireland. NIEL agrees with BFN’s position that in order to align with the recommendations of the National Food Strategy (NFS) report,² which is the first comprehensive review of the food system in 75 years, the NI Food Strategy Framework should recognise the intrinsic value of local food strategies, developed and delivered in partnership with communities, to bring about the necessary changes in the food system. According to the NFS report, diets will need to change over the next decade to meet the Government’s existing targets on health, climate and nature. For example, by 2032, fruit and vegetable consumption will have to increase by 30%, fibre consumption by 50%, while consumption of food high in saturated fat, salt and sugar will have to decrease by 25%, and meat consumption should decrease by 30%. The NFS calls for recommendations to address climate change, biodiversity loss, land use, diet-related disease, health inequality, food security and trade and has grouped them under four main objectives:

1. Escape the junk food cycle to protect the NHS.
2. Reduce diet-related inequality.
3. Make the best use of our land.
4. Create a long-term shift in our food culture.

In relation to those four objectives, reducing the amount of junk food consumed should be an important part of tackling the many problems associated with obesity in NI. As far back as 2012 a study by Safefood³ revealed that obesity cost the NI economy more than £370 million a year, more than £1 million a day on average. The potential to reduce the economic and health costs of the growing rates of obesity should be good enough reasons for the Department of Finance and the Department of Health to co-operate to tackle obesity. Related to this question of the economic and health impacts of food, and further to the second main objective of the NFS, is the issue of diet related inequality and food poverty. According to the Trussell Trust⁴ which has more than 1,200 food banks, which is about two thirds of the food banks in the UK, in 2019-20, the trust provided 45,134 food parcels in NI but that rose to 78,827 parcels in 2020-21. Almost 48,000 (47,799) food parcels went to adults, up from 26,000 in 2019-20, while just over 31,000 were given to children, about 12,000 more than the previous year (18,974). There is also the question of the efficiency of our food production processes with only 5% of our agricultural land currently producing plant-based food, most of which is used as animal feed⁵. Finally, as regards the long term shift in our food culture, as Sustainable Food Places⁶ has argued, a shift towards healthier and more sustainable food is only likely to happen when there are high levels of public awareness of food issues and widespread participation in food-related activity, by both individuals and institutions, as part of a growing movement of active food citizenship. This will require communications and events that can inspire people about the role, importance and joy of good food, particularly in our schools so that children become familiar with good food from an early age; practical engagement opportunities such as growing, cooking and sharing food in every community; and a facilitated network through which food actors of every kind can connect and collaborate on-line and in person as part of a local good food movement. This is also explored in our response to Q4.

It is NIEL's hope that plans to improve the health of our population in the medium to longer term through a more sustainable and healthy food system will be supported by the Department of Finance and the Department of Health for the reasons outlined above. NIEL believes that the NI food strategy should also include specific targets and recommendations to address climate change, biodiversity loss, land use, reducing water pollution and the use of pesticides and antibiotics, diet-related disease, health inequality, improving food security and trade. Prioritising local sustainable food has enormous potential to enrich health and address dietary related diseases with improved diet choices (including choices in chemical free and organic farming sources) through, amongst other things, reduced food miles, reduced waste, enhanced economic contributions, better protecting the environment, contributing to achieving net zero greenhouse gas (GHG) emissions and enhanced value in communities.

Q3 What are your views on the strategic context identified?

NIEL believes it is right that the draft food strategy should contribute to achieving the aims of the forthcoming Programme for Government (PfG) and future versions of the PfG. However it is inappropriate for any food strategy to only take account of the PfG as that is far too narrow a focus and other strategies and policies must be accounted for. Further detail is provided in our response to Q4.

Q4. From your perspective, are there any other NI government policy linkages which you feel are relevant?

Yes, absolutely. It is inappropriate for any NI food strategy to only take account of the PfG as that is far too narrow a focus. If our NI food systems are to take a 'whole of government approach' as described in the consultation, then those systems should also link in to the following strategies and policies: the environment strategy, biodiversity strategy, land use strategy, peatland strategy, ammonia strategy, marine strategy, green growth strategy, the agricultural policy framework, the PfG and all other relevant NI land and water nature based legislation which is related to and/or derived from European legislation, such as the Water Framework Directive (WFD), as well as other directives and regulations and any future NI climate change act and sustainable development or wellbeing of future generations act. This is not an exhaustive list but an indicative list.

NIEL believes that the NI food strategy should involve the Department of Health, Department of Education and Department for Infrastructure in particular as key partners responsible for delivery of the strategy. As outlined in our response to Q2, the support of the department of Finance will also be critical.

However, it is the co-operation with the Department of Health and the Department of Education that will probably be the most important for the NI food strategy. For example, the provision of proper nutrition in hospitals and care homes can be an important factor in patient recovery. The importance of healthy food and better diets in relation to the problems of obesity levels has already been referred to. Beyond this, the current review of Education provides an opportunity to look at school food, and assess the viability of implementing a whole setting approach for schools, nurseries and their surrounding communities together around the core ethos of healthy, tasty and sustainable food.

The Department of Education can implement a strategic and enhanced food education program, across the existing curriculum, by including food across primary seasons, farming and world around us, the secondary school home economics and budget management, food diary planning, minimising waste, food storage, and seasonal cooking, sciences, one health, composting, gas and renewable energy subject areas. The education system should also look at how to educate students, especially children, about food using more practical means including, for example, using the school grounds to grow food for the school and/or local community. The experience of growing food should help students make stronger

connections with their food and their environment and give them a better understanding of where food comes from. Research shows that children who are better connected to nature rate their health and well-being as higher⁷ and are more likely to show eco-affinity and an inherent motivation to exhibit ecological behaviours, which is central to decreasing our harmful impact on the environment^{8,9}. The Genius School Food Network, which is based in QUB, Belfast¹⁰ is an example of a collaborative effort to promote more healthy food and nutrition in our schools. Third level institutions should also be included in efforts to promote the understanding and consumption of healthy foods in schools, especially those institutions which already offer agricultural programmes.

The Food for Life's Early Years Award provides an independent endorsement for nurseries and children's centres that serve good quality, nutritious food and support the babies and children in their care to develop good eating habits for life.

There are likely to be economic benefits to this approach as well. According to the New Economics Foundation¹¹ (NEF) 2011 report "The benefits of Procuring School Meals through the Food for Life Partnership" in Nottinghamshire, spending for school meals locally within an FFLP framework is calculated to generate over £5 million in value each year, returning £3.11 in social, economic and environmental value for every £1 spent. In addition, 'comparing current spending and re-spending in Nottinghamshire now and prior to a focus on procuring locally and seasonally shows that the total amount of money circulating in the local economy from this source has increased substantially, from £181,418 in 2004 to £3,826,688.' The NEF report also highlighted the value of public sector procurement which is addressed further in our response to Q11.

The remit of the Department for Infrastructure is linked to the new Living Spaces fund, tackling climate change, our water way, land use and access, active travel climate change and rural investment and revitalisation.

Q5 What are your views on the proposed ambition of the NI Food Strategy Framework?

AMBITION: For Northern Ireland to be a world-class food region, recognised for the quality, nutrition, safety and integrity of its food and its knowledge based approach. Central to this ambition are our use of sustainable production systems, the award winning quality of our products, the highest ethical and animal welfare standards, respect for the environment and everyone who works in the sector.

NIEL would support the proposed ambition of the strategy for NI to have a sustainable food system based upon the FAO's definition of such a food system¹². The FAO has said that a sustainable food system (SFS) is a food system that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition for future generations are not compromised. This means that:

- It is profitable throughout (economic sustainability);
- It has broad-based benefits for society (social sustainability); and
- It has a positive or neutral impact on the natural environment (environmental sustainability).

A sustainable food system lies at the heart of the United Nations' Sustainable Development Goals (SDGs), As the FOA said¹³

“To realize the SDGs, the global food system needs to be reshaped to be more productive, more inclusive of poor and marginalized populations, environmentally sustainable and resilient, and able to deliver healthy and nutritious diets to all. These are complex and systemic challenges that require the combination of interconnected actions at the local, national, regional and global levels.”

NIEL believes that sustainability must be a central part of the NI food systems and address the issues we face in terms of the climate change and biodiversity crises.

Q6. What are your views on the proposed scope of the NI Food Strategy Framework?

SCOPE: A soil to society approach, encompassing the production, processing, marketing, and consumption of food and the consumer values and behaviours that influence these processes.

The proposed scope of the NI Food Strategy Framework could be expanded to ensure that all relevant stakeholders are included in the whole food system and so an alternative wording for the scope could be as follows:

“A soil to society approach, encompassing all stakeholders in developing a healthier, sustainable and more equitable food system for all.”

Achieving this will require improved communication with the general public of the benefits and implications of different food choices and greater food literacy, as discussed in our response to Q10.

Q7. What are your views on the proposed vision of the NI Food Strategy Framework?

VISION: A transformed food system that protects natural resources for future generations, is economically and environmentally sustainable and provides safe, nourishing, accessible food to people, who make informed healthy choices.

This is a reasonable vision for food in NI but as outlined in our response to Q2, NIEL believes the vision should be expanded to reflect the recommendations in the National Food Strategy report¹⁴.

NIEL welcomes the emphasis on a sustainable food system that protects natural resources for future generations and is sustainable, based upon the FAO's definition of such a food system¹⁵ as outlined in our response to Q5. NIEL believes that this proposed vision should be expanded so that the vision is for a system that not just protects natural resources but enhances natural resources and refers to the need for a more equitable food system for all. As such NIEL proposes that the revised vision reads

“A transformed food system in line with the FAO's definition of a sustainable^a food system that protects and enhances natural resources for future generations, and provides a healthier, sustainable and more equitable food system for all.”

Q8. What are your views on the proposed aim of the NI Food Strategy Framework?

AIM: The NI Food Strategy Framework aims to be a cross government unifying strategy, with a shared vision, principles and priorities to guide long term food decision making.

NIEL believes the NI Food Strategy Framework needs to be not just a cross government unifying strategy but a whole food-system approach, as the consultation document refers to in Q2, that brings together all relevant sectors in society, including those outside of government in the education sector, the health sector, the environment sector, the agricultural sector, the retail sector and the third sector. This will be necessary to properly account for the role of those other elements within the food system.

NIEL believes it is essential that there are clear action plans with SMART targets and related budgetary commitments in order to achieve this aim.

^a As per the FAO definition, sustainability includes economic, environmental and social factors and as such if a process or product is sustainable it should be sustainable in all (three) aspects or component factors. As such there is no need to repeat those factors.

Q9 Do you agree with the proposed six strategic priorities?

NIEL welcomes the proposed strategic priorities as a good basis for managing food and would not disagree with the principles proposed but would recommend some amendments are made to these principles, as outlined below in our response to Q10, to make them even better.

Q10. Are there any amendments or refinements that you would like to make to these priorities?

Yes.

While NIEL supports these guiding principles, it believes that a more expansive and inclusive approach is needed. NIEL would refer the department to the response by Belfast Food Network for further detail on how the guiding principles could be improved upon but some main suggestions are outlined below.

Given the broad interconnected nature of our food system, NIEL believes that further explanation and engagement will be needed to clarify how data will be gathered, by whom and from which sources, how the targets will be planned and captured, who will report on progress towards achieving targets which must be SMART.

Strategic priority one - building connections between health/wellbeing and food

The connection to healthy lives and food education is welcome. However, the connections between the provision of affordable nutritious food and physical and mental health and wellbeing should also be recognised as should the benefits in terms of reducing food inequality/poverty and achieving better environmental outcomes such as greening neighbourhoods and reducing food miles. Also, food education should be broader than just providing information relating to health and food and should include health and food literacy, to enable individuals to critically evaluate the information that links health and food and so to make more sustainable and healthy food choices and as a result lead healthier lifestyles, as outlined in Priority 1. This links closely to strategic priority five and the two should be considered together.

In relation to building connections between health, wellbeing and food choices, the provision of information will be key. This should include issues such as where is it from, when is it available, who has access to it, what can be made with it and an evaluation of the health implications of the options available. It will need a strategic communications and delivery plan to reach general consumers and increase confidence, reach parents, minority groups, disability registered as well as those already trying sustainable food and confident cooks.

Strategic Priority Two: building sustainable economic prosperity

The Food and Drink sector is an important part of the NI economy. While it is essential the production and consumption of food complies with all relevant legislation including any forthcoming NI climate change act and emission targets, as well as the relevant targets in relation to the prevention of water pollution, the new whole food system this NI Food Strategy Framework proposes, must provide greater levels of support for environmentally friendly, low-impact methods of food production, such as agro-ecological approaches to maximise all potential benefits. As referred to in our response to Q11, this should tie in to the proposed amended agricultural support system based on the principle of public money for public goods, where farmers are supported for the environmental/ecosystem goods and services they provide.

Strategic Priority Three - building a food culture and food conscious society

This strategic priority is welcome and some of the main stakeholders have been identified in the proposal but it is unclear how this heightened awareness and civic pride is to be achieved. This strategic outcome is likely to be very closely linked to Strategic Outcome 1

Strategic Priority Four - protecting and enhancing our natural resources

As outlined in the NI Greenhouse Gas Emissions 2019 report¹⁶, agriculture in NI the largest source of greenhouse gases (GHGs), responsible for 26% of NI's GHG emissions in 2019. Furthermore, in NI the land use change sector acts as a net source of GHGs rather than a sink.¹⁷ Therefore, the reference to carbon reduction opportunities in the agriculture sector is welcome. However, as outlined in the NI Greenhouse Gas Emissions 2019 report¹⁸ for the agriculture sector, methane from livestock and nitrous oxide from soils were more significant in terms of agriculture's overall greenhouse gas (GHG) footprint than carbon dioxide, with methane representing approximately 66% of agriculture's GHG emissions (in terms of million tonnes CO₂ equivalent^b (MtCO₂ e)). Despite this, neither the role of methane or nitrous oxide is mentioned in strategic priority four. NIEL is unclear as to the rationale for omitting any reference to these gases and would be interested to know why the department made no reference to them as this is a serious oversight.

As outlined in our response to Q10, there is no reference to the important role of ecosystems services in strategic Priority 4 and NIEL regards this as a significant oversight, as food systems are completely dependent on nature and ecosystem services. The role of ecosystem services and nature friendly farming practices should be a much greater priority in strategic priority four.

^b According to the NI GHG emissions report 2019, agriculture was responsible for 5.6 million tonnes equivalent of Carbon Dioxide (MtCO₂ e) of which methane represented 3.7 MtCO₂ e (66% of the total), nitrous oxide represented 1.3 MtCO₂ e (23% of the total) and Carbon Dioxide (CO₂) 0.6 MtCO₂ e (11% of the total).

Strategic Priority Five - building healthy lives through food education

NIEL supports this approach as an essential priority and welcomes the proposed inclusion of schools as a key stakeholder in achieving this priority. However, there is an important stage missing here and that is the role of feeding and weaning from birth to two years. If a baby is weaned with healthy food then that can lay the foundations for a healthy diet in later years, particularly in school. NIEL would support steps to make the food provided in schools healthier. There is also the issue of the provision of free school meals for all children, to avoid any perceived stigmatisation and the need for those school meals to be healthy and sustainable. The provision of healthy options such as classroom fruit and vegetables as snacks at break time in the later part of Primary school could present the opportunity of a whole class/school approach. A pilot scheme programme could investigate children's choices when presented with a wider range of options.

Education in relation to food is a good idea but NIEL would suggest that the goal is greater understanding of the importance and benefit of healthy and sustainable food choices and so on the basis that the desired outcome is a greater level of food literacy, NIEL would recommend amending priority five to read "Building Healthy Lives through improved health and food literacy."

Strategic Priority Six - building and maintaining appropriate emergency contingency plans across the supply chain.

NIEL supports this strategic priority.

Q11. From your perspective, are there any strategic priorities that are missing

Yes, NIEL believes that public procurement provides an important opportunity to promote good food throughout the supply chain, as referred to in our response to Q4. Catering across the public estate in a wide range of settings including nurseries, schools and colleges, hospitals and care homes and public venues could be transformed by a requirement to provide healthy, nutritious, sustainable and local food.

NIEL believes that the NI administration should lead by example and amend its purchasing policies. The purchasing power of the government and all the statutory bodies in NI is massive and provides a huge opportunity to drive the development of a more sustainable economy including a more sustainable food sector. Procurement expenditure accounts for some £3bn annually, representing a quarter of the NI Executive's budget¹⁹. If the Department of Finance and the Executive ensured this expenditure was as sustainable as possible it could make a huge difference to reducing Northern Ireland's ecological footprint and should help support many green, low carbon industries, many of which could be local, and could help to make the food supply chain much more sustainable. As the NI Finance

Minister²⁰ said in relation to a reported £31 million in savings achieved under a new contract which will see 100% renewable energy supplied to government buildings

“procurement can be a key lever in the transition to a Green Economy.”

Public sector bodies can adopt sustainable food policies for example, by providing healthy catering and vending; tap water only (rather than water in plastic bottles); local, organic and other climate and nature friendly produce; responsibly caught/sourced fish; less but better quality meat and by ensuring compliance with ethical standards such as Fairtrade. Public sector bodies could also set targets to achieve recognised healthy, sustainable and ethical food accreditation, such as Food for Life Served Here, Marine Stewardship Council and Compassion in World Farming awards, amongst others.

The negative impacts of the current agricultural system in Northern Ireland must be addressed. As referred to in our response to Q10, not only is agriculture in NI the largest source of greenhouse gases (GHGs), responsible for 26% of NI’s GHG emissions in 2019²¹, but in NI, the land use change sector acts as a net source of GHGs rather than a sink.²² In addition, agriculture was the sector responsible for the largest proportion of substantiated water pollution incidents in NI in 2019 (36.5% of the 1,754 substantiated water pollutions), according to the NI Environmental Statistics Report 2021²³. In fact, according to official figures, agriculture was responsible for the largest proportion of substantiated water pollution incidents in NI in 2018²⁴, 2017²⁵, 2016²⁶, 2015²⁷, 2014²⁸, 2013²⁹, 2012³⁰, 2011³¹ and 2010³². Given that agriculture has been the main source of water pollution in NI every year of the previous decade, it seems clear that a different approach to how we manage our land, particularly in terms of water pollution, is needed as a matter of urgency.

As the UK Government’s 25 year plan for nature, ‘A Green Future’³³ stated

“Overall, farming is now the most significant source of water pollution and of ammonia emissions into the atmosphere in the UK.”

As previously noted, NIEL believes that the negative impacts of agriculture on biodiversity must be stopped, minimised and where possible reversed and believes the NI Food Strategy Framework must commit to protecting and enhancing our biodiversity, as outlined in our response to Q7. This could be done, for example through amending the vision so that it states that the food system “enhances, promotes and protects natural resources for future generations, is economically and environmentally sustainable and provides and provides a healthier, sustainable and more equitable food system for all.”

In order to help achieve this there needs to be a greater emphasis on nature friendly farming practices and the use of natural capital and the role of ecosystem services in any future food strategy including in relation to soil formation, pollination, nutrient cycling, water regulation

and purification. This should tie in to the proposed amended payments system for agricultural support based on the principle of public money for public goods, in other words farmers should be rewarded for the environmental/ecosystem goods and services they provide. NIEL would like to see a greater emphasis on an agro-ecology approach which involves the application of integrated ecological, economic and social principles towards resilience in food. The importance of a much greater role for agroecology is clearly demonstrated by the environmental impacts of agriculture explored in this consultation response, including in our response to Q23.

Q12 What are your views on the proposed guiding principles to be used to guide the development of future policy interventions?

NIEL supports the eight principles but would suggest that the eighth principle needs to be embedded in sustainability and that the benefits of localised, shorter supply chains that increase food security, strengthen local economies and regenerate rural communities are fully recognised and properly accounted for.

Q13. From your perspective, are there any guiding principles missing? If yes, what are they and why?

NIEL believes that NI's food system should aim for greater levels of sustainable food accreditation such as Fairtrade, Rainforest Alliance and MSC recognising that greater education and training for businesses, organisations and stakeholders across the food supply chain and wider system will be needed if that is to be achieved. Belfast has had Fairtrade City status from the UK Fairtrade Foundation³⁴ since 2005 and was the first city to gain dual Fairtrade accreditation when it also received accreditation from Fairtrade Ireland³⁵ in 2006³⁶. NIEL would refer the department to the recommendations made by BFN in this respect, to ensure appropriate standards are set and maintained to ensure the food supply chain is much more sustainable.

Q14. Do you agree with the high level vision, principles and strategic areas contained in the proposed NI Food Strategy Framework?

NIEL agrees with the high level vision, principles and strategic areas in the proposed NI Food Strategy Framework.

Q15. Have you any other comments on the proposed NI Food Strategy Framework?

NIEL supports the position of BFN and would recommend the department and the Executive engage with BFN in relation to its seven-step emergency food aid response that relies wholly on the provision of healthy sustainable food through existing local supply chains.

Q16 What are your views on the proposed approach to implementation, i.e. five year action plans will be developed and implemented in collaboration with key stakeholders and partners?

NIEL supports the proposed approach, but would appreciate further information on how the action plans will be developed and implemented, and how the engagement process for key stakeholders and partners will be implemented.

Q17. What are your views on the establishment of a Food Programme Board that is embedded within the governance arrangements for Green Growth?

NIEL is not convinced of the merits of this proposal. While NIEL welcomes the proposal for an Inter-Ministerial Group (IMG), chaired by the DAERA Minister, supported by a Senior Officials Group representing all Departments dealing with food, NIEL is not convinced that this must sit within the governance arrangements of the Executive's Green Growth Strategy. The Green Growth Strategy is not yet finalised and NIEL has some concerns about the emphasis on increasing production and the generally weak and vague language in relation to the protection of the environment in that strategy and as such NIEL believes it would not be appropriate for the Food Programme Board to sit within the governance arrangements of that strategy. NIEL does agree that the Food Programme Board should facilitate engagement and partnership with stakeholders, including the food Industry, voluntary and community sector and consumers.

Q18. Do you have any comments on future arrangements for engagement with stakeholders about implementation and delivery of the NI Food Strategy Framework?

The Ni Food Framework Strategy provides a great opportunity for the NI Government to implement open government practices, which is based on transparency, participation and accountability.

NIEL also believes a much greater degree of engagement with NGOs including those in the health and education sectors is necessary.

Q19. Have you any other comments on how to achieve a diverse and inclusive process for public engagement?

Maintaining an open exchange of knowledge and experience between government and the public is a crucial component of inclusive participation. The Executive should maintain and build on existing relationships developed through key community liaison officers, community and voluntary groups.

Q20. Do you agree with the potential benefits to be derived from taking a Food Strategy Framework approach?

Yes.

Q21. Are there any rural needs comments that you wish to raise at this point about the impact of the NI Food Strategy Framework on Rural areas? Do you have any evidence that would be useful to Departments? If so, can you describe the evidence and provide a copy.

No.

Q 22. Are there any equality comments that you wish to raise at this point? Do you have any evidence that would be useful to Departments? If so, can you describe the evidence and provide a copy.

The NI food strategy should ensure fairness by, amongst other things addressing the inequalities in access and availability of healthy food previously referred to.

Q23. Are there any environmental impact comments that you wish to raise at this point? Do you have any evidence that would be useful to Departments? If so, can you describe the evidence and provide a copy.

The omission of ecosystem services is of concern given the fundamental reliance of the food sector on nature and ecosystem services, including for example, the provisions of fresh water and pollination services. The protection, restoration and enhancement of the environment and the services it provides needs to be an underlying principle for the strategy. Unsustainable production practices and pollution jeopardises the entire sector and NI's food security as well as the health of our environment and our people and can increase costs particularly in relation to clean up costs.

As outlined in our response to Q11, NIEL believes there is a particular issue with water pollution from agriculture in NI, which has been the main source of water pollution in NI every year of the last decade. It therefore seems clear that a different approach to how we manage our land, particularly in terms of water pollution, is needed as a matter of urgency. This emphasises the importance of integrating the NI food system with the NI climate change legislation that is anticipated to come in to force in 2022, the environment strategy, the biodiversity strategy, the peatland strategy, the green growth strategy, the PFG and other relevant strategies and policies, which were referred to in our response to Q4.

As mentioned in our response to Q4, the absence of any reference to the role of methane and nitrous oxide in relation to the greenhouse emissions from agriculture would appear to be hard to justify and NIEL would appreciate it if the department could explain why the two greenhouse gases that DAERA previously described as “more significant greenhouse gases than carbon dioxide”³⁷ were not referred to in this consultation document even though Carbon Dioxide was referred to.

Q24. Are there any other comments you wish to make or any other evidence of need that you think Departments would find helpful? Please submit any evidence with your response

Not at this point.

-ENDS-

-
- ¹ <https://www.fao.org/3/ca2079en/CA2079EN.pdf>
- ² <http://www.nationalfoodstrategy.org/>
- ³ <https://www.safefood.net/getmedia/c22044e1-04ea-4a14-a4c2-77707e54c1a2/Final-Exec-Summary-The-Economic-Cost-of-Obesity.aspx?ext=.pdf>
- ⁴ <https://www.trusselltrust.org/news-and-blog/latest-stats/end-of-year-stats-ob/>
- ⁵ https://www.thersa.org/globalassets/pdfs/reports/rsa-ffcc-northern-ireland---lay-of-the-land-final_september19.pdf
- ⁶ https://www.sustainablefoodplaces.org/resources/local_good_food_movement/
- ⁷ Kerr, K. (2015) Report for the Royal Society for the Protection of Birds (RSPB): Connection to Nature Questionnaire on the Northern Ireland's Kids Life and Times Survey. The School of Education, Queen's University, Belfast.
http://www2.rspb.org.uk/Images/Queen's%20University%20report%20for%20the%20RSPB%20on%20the%20Nature%20Questionnaire%20on%20the%20Northern%20Ireland%20Kids%20Life%20and%20Times%20Survey_tcm9-407667.pdf
- ⁸ Larson, L.R., Castleberry, S.B., & Green, G.T. (2010). Effects of an environmental education program on the environmental orientations of children from different gender, age, and ethnic groups. *Journal of Park and Recreation Administration*, 28(3), 95–113
https://lrl.people.clemson.edu/WebFiles/Larson.etal.2010_JPRA-EEval.pdf
Otto et al., 2017)
- ⁹ Otto, S., & Pensini, P. (2017). Nature-based environmental education of children: Environmental knowledge and connectedness to nature, together, are related to ecological behaviour. *Global Environmental Change*, 47, 88-94.
<https://doi.org/10.1016/j.gloenvcha.2017.09.009>
- ¹⁰ <https://geniusschoolfoodnetwork.com/>
- ¹¹ <https://www.foodforlife.org.uk/~media/files/evaluation%20reports/fflp-nef----benefits-of-local-procurement.pdf>
- ¹² <https://www.fao.org/3/ca2079en/CA2079EN.pdf>
- ¹³ Ibid page 1
- ¹⁴ <http://www.nationalfoodstrategy.org/>
- ¹⁵ <https://www.fao.org/3/ca2079en/CA2079EN.pdf>
- ¹⁶ <http://www.daera-ni.gov.uk/publications/northern-ireland-greenhouse-gas-inventory-1990-2019-statistical-bulletin>
- ¹⁷ DAERA Northern Ireland Greenhouse Gas Emissions 2018 https://www.daera-ni.gov.uk/sites/default/files/publications/daera/NI%20Greenhouse%20Gas%20Statistics%201990-2018%20-%20Report%20%28web%20version%29_0.pdf (page 8)
- ¹⁸ <http://www.daera-ni.gov.uk/publications/northern-ireland-greenhouse-gas-inventory-1990-2019-statistical-bulletin> page 10
- ¹⁹ <https://www.northernireland.gov.uk/node/48239>
- ²⁰ <https://www.finance-ni.gov.uk/news/murphy-and-dodds-welcome-renewable-energy-contract-delivering-ps31m-savings>
- ²¹ <http://www.daera-ni.gov.uk/publications/northern-ireland-greenhouse-gas-inventory-1990-2019-statistical-bulletin>
- ²² DAERA Northern Ireland Greenhouse Gas Emissions 2018 https://www.daera-ni.gov.uk/sites/default/files/publications/daera/NI%20Greenhouse%20Gas%20Statistics%201990-2018%20-%20Report%20%28web%20version%29_0.pdf (page 8)
- ²³ <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2021.pdf>
- ²⁴ <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2020.pdf>
- ²⁵ https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2019_1.pdf
- ²⁶ https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2018_1.pdf
- ²⁷ https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2017_2.PDF
- ²⁸ <http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2016/environment/2016.pdf>

²⁹ <https://www.daera-ni.gov.uk/sites/default/files/publications/doe/ni-environmental-statistics-report-2016.pdf>

³⁰ <https://www.daera-ni.gov.uk/sites/default/files/publications/doe/ni-environmental-statistics-report-2014.pdf>

³¹ <https://www.daera-ni.gov.uk/sites/default/files/publications/doe/ni-environmental-statistics-report-2013.pdf>

³² <http://www.niassembly.gov.uk/globalassets/documents/raise/publications/2016/environment/2016.pdf>

³³ A Green Future: Our 25 Year Plan to Improve the Environment
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf page 38

³⁴ <https://www.fairtrade.org.uk/>

³⁵ <https://www.fairtrade.ie/>

³⁶ <https://www.belfastcity.gov.uk/Business-and-investment/Resilient-Belfast/Belfast-a-fairtrade-city>

³⁷ https://www.daera-ni.gov.uk/sites/default/files/publications/daera/NI%20Greenhouse%20Gas%20Statistics%201990-2019_2.pdf
page 10