

# UNTAPPED OPPORTUNITIES FOR CLIMATE ACTION

An assessment of food systems in  
Nationally Determined Contributions



COUNTRY ASSESSMENT

**UNITED KINGDOM**



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## PREFACE

Integrating food systems transformation into the Nationally Determined Contributions (NDCs) – the national climate actions at the heart of the Paris Agreement, is critical to delivering on interconnected ecological, biodiversity, health, economic, social, and cultural goals. Taking a food systems approach builds climate resilience and results in a diversity of context-specific solutions for food production, distribution, consumption, and waste. Yet, food systems are rarely prioritized in climate policy.

This country assessment is part of a suite of publications that are designed to centre food systems transformation in future climate policy:

1. **Untapped Opportunities for Climate Action: An Assessment of Food Systems in Nationally Determined Contributions**: A summary report providing a synthesis of the 14 country assessments with recommendations and priority actions for policymakers and climate policy advisors
2. **A Practical Guide to Assessing Food Systems in Nationally Determined Contributions (NDCs)**: A guide with a framework designed to enable users to take a food systems approach to developing future NDCs and implementing climate policies.
3. A set of **14 country assessments** examining the latest NDCs of 14 countries from around the world, outlining areas of improvement and opportunity.

Users are also encouraged to read **Confronting the Climate Crisis with Food Systems Transformation: Stories of Action from 14 Countries**, which provides a catalogue of global case studies that complement the suite of materials for policymakers, advisors, and advocates of climate action.

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## OVERVIEW OF THE UNITED KINGDOM'S FOOD SYSTEMS

Food is an important component of the economy of the United Kingdom of Great Britain and Northern Ireland (U.K.). Food is the U.K.'s largest industrial sector.<sup>1</sup> In 2018, the food sector\* contributed 9.4% to the national Gross Value Added (GVA), with beverages, meat products, and baked goods contributing the most to the GVA.<sup>2</sup> The food sector is also the biggest employer in the U.K., employing over 4 million people.<sup>3</sup> Jobs are predominantly concentrated in non-residential catering and food and drink retailing, while agriculture, fishing, manufacturing, and wholesaling provide a little over a million jobs. Women account for 56 and 54% of the employees in the retailing and non-residential catering sub-sector, respectively.<sup>4</sup> In turn, agriculture relies significantly on seasonal migrant workers, particularly from the European Union (E.U.), who in 2016 represented a third of the workers employed in the agricultural sub-sector.<sup>5</sup>

Agricultural production only meets about half of the U.K.'s food needs, making food imports important. As much as 72% of the land in the U.K. is used for agricultural production, which provides 53% of food consumed.<sup>6</sup> The main foodstuffs produced in the U.K. are milk, beef and veal, and cereals.<sup>7</sup> The remaining food demand is met through international trade — with about 30% of all food consumed in the U.K. coming from the E.U.<sup>8</sup> Fruits, vegetables, meat, and beverages are among the main foodstuffs imported into the U.K.<sup>9</sup> Food imports have increased over recent decades as the U.K. produces less food domestically and consumers become increasingly accustomed to global diets.<sup>10</sup>

The U.K. faces several health challenges related to its food system. Unhealthy diets have induced a spike in non-communicable diseases (such as obesity, heart diseases, and diabetes) and contribute to 64,000 deaths annually.<sup>11</sup> One in four adults is obese and almost two-thirds of the population is considered overweight.<sup>12</sup> A recent audit by the Food Foundation thinktank found that 50% of children born in the U.K. in 2020 are likely to be obese by the time they are 65 years old. In addition, the audit found that it is primarily poor households who are unable to meet national nutrition guidelines due to the high prices of healthy foods.<sup>13</sup> Poor nutrition is a risk factor for many non-communicable as well as infectious diseases. For example, fibre consumption in the U.K. averages only 60% of recommended daily intake,<sup>14</sup> a risk factor for coronary events, type-2 diabetes and colon cancer, among others<sup>15</sup> and obesity has been found to be correlated with an increased risk of developing severe COVID-19 symptoms and death.<sup>16</sup>

The food system of the U.K. generates various environmental externalities. Unsustainable land management and production practices drive biodiversity loss, land degradation, and pollution. In addition, the intensification of agricultural practices has impacted both the availability and quality of water sources, with as much as 78% of surface water bodies in Northern Ireland not meeting “good ecological status” and similarly high figures in England (76%) and Wales (64%).<sup>17</sup> The U.K.'s agricultural sector contributes 10% of the country's greenhouse gas (GHG) emissions.<sup>18</sup> This figure does not capture the climate impact of the U.K.'s entire food system. Not only does it not capture the emissions associated with other food system elements (such as food transport, consumption, and disposal), the figure also does not consider the GHG emissions associated

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\* The food sector is defined here as including agriculture and fishing; food and drink manufacturing, wholesaling, retailing and non-residential catering.

with imported commodities. Between 2016 and 2018, for instance, the U.K.'s overseas land footprint\* for just 7 commodities (palm oil, beef, soy, cocoa, rubber, timber, and pulp and paper) was more than 21 million hectares — all in countries where natural ecosystems are at risk of being cleared for land use.<sup>19</sup>

The country's food system is highly vulnerable to stresses and shocks including climate change, COVID-19, and Brexit. By means of example, COVID-19 and Brexit have driven labour shortages across U.K. food systems (most notably at the production and distribution stage), forming a disruptive threat to food supply chains.<sup>20</sup> This highlights the importance of building the resilience of the U.K.'s food systems.<sup>21</sup>

Transformational change in the U.K.'s food systems presents an opportunity to substantially decrease GHG emissions arising from the food sector, as well as achieve several benefits related to health, employment, water quality, food security, and resilience. However, such a transition must be balanced with complex trade-offs, as well as competing needs and interests across food systems, and requires comprehensive action.

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\* Land footprint refers to the estimated hectares in land area required to provide a commodity; see WWF-UK & RSPB, "Riskier Business: The UK's Overseas Land Footprint" (2020). Retrieved from: [https://www.wwf.org.uk/sites/default/files/2020-07/RiskierBusiness\\_July2020\\_V7\\_0.pdf](https://www.wwf.org.uk/sites/default/files/2020-07/RiskierBusiness_July2020_V7_0.pdf).

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## NDC STATUS

The U.K. submitted its first NDC in December 2020 after leaving the European Union. The NDC is complemented by two more submissions to the United Nations Framework Convention for Climate Change: The Adaptation Communication that sets out the country's domestic and international ambition and action on adaptation and resilience, and the Finance Biennial Communication, which outlines the climate finance commitments to developing countries.

**The following assessment was conducted between March and September 2021, and is largely based on the U.K.'s NDC as well as interviews with six key stakeholders.**

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## KEY FINDINGS

### NDC DEVELOPMENT PROCESS

TABLE 1: NDC DEVELOPMENT: KEY FINDINGS AT A GLANCE

#### Key findings

- A coordination mechanism supported the NDC formulation process.
- The NDC target level was informed by guidance from the U.K. Climate Change Committee (CCC) and was substantiated with scientific data and stakeholder input.
- The NDC was developed in consultation with some stakeholders.

#### Areas for improvement

- Be more transparent about the NDC formulation process, including whether it was democratic and systems-based.
- Streamline engagement with food systems stakeholders during NDC formulation, including through active recruitment.
- Improve coordination across ministries to identify positive and negative externalities of NDC measures.
- Include up-to-date research on the mitigation potential and co-benefits of transforming food systems.
- Follow a similar approach as Scotland's indicative NDC.

**The U.K.'s NDC was developed through a national coordination mechanism.** The U.K. Department for Business, Energy and Industrial Strategy (BEIS) led the development of the NDC and decisions around its headline target. The process was agreed upon across a range of government departments and informed by advice from the Climate Change Committee (CCC), an independent statutory body that advises the U.K. Government on climate change.\* Climate action in the U.K. is framed by the legally binding Climate Change Act of 2008, which sets up a broad framework for climate change mitigation through long-term goals and intermittent Carbon Budgets. Carbon Budgets cover 5-year periods and are set 12 years in advance. It is important to note that, while the NDC is not part of the legal framework established by the Climate Change Act (which was passed well before the Paris Agreement was signed), the U.K. government has integrated the NDC development process into the framework provided by the Act by aligning the NDC headline target with the Sixth Carbon Budget, as expanded on below.<sup>22</sup> The Climate Change Act also established the CCC with a remit to fully appraise, every 5 years, which policy reforms are needed for the U.K. to reach its long-term goal and provide advice on the next Carbon Budget. While the advice of the CCC is not legally binding, the

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\* The carbon budget is set 12 years in advance and outlines an emissions reductions target and associated measures.

U.K. government must justify whenever it deviates from this advice.<sup>23</sup> The advice of the CCC has enabled it to contribute greatly to decarbonizing the U.K.'s energy sector, and it is expected that the CCC's leadership will be increasingly relevant in transforming the U.K.'s food systems in the near future.<sup>24</sup> In addition to the leadership function of the CCC, however, government and civil society action will be crucial to catalyzing a food systems transformation. While the Department of Energy and Climate Change (DECC) and then BEIS demonstrated very strong leadership on energy — aided by civil society advocacy — food systems governance is currently fragmented in the U.K., and Defra is not visibly leading on food systems transformation.<sup>25</sup>

**Scientific data and stakeholder consultations underpin the headline target of the NDC.** The CCC advised BEIS to adopt a NDC headline target in line with the U.K.'s path to its Sixth Carbon Budget.<sup>26</sup> In turn, the Sixth Carbon Budget was set at the level recommended by the CCC. The CCC's advice on the Sixth Carbon Budget was substantiated by scientific data and consultations with key stakeholders, including food and health experts.<sup>27</sup> For this, the CCC sought the input of relevant actors via calls for evidence, whereby external stakeholders from academia, industry, and civil society put forward pieces of evidence. The CCC furthermore commissioned independent expert advisory groups for additional input. Yet, while the CCC's advice on the headline target for the Carbon Budget has been adopted, the U.K. government has conducted further analysis based on its own assumptions,\* which, in some instances, deviate from those of the CCC.<sup>28</sup> More concretely, the U.K. government does not assume that people will change their diets — as the CCC does — and is explicit in its aim to maintain people's freedom of choice relating to diets.<sup>29</sup>

**The NDC was developed in consultation with some stakeholders, although the exact process through which this occurred is not transparent.** Interviews indicate that stakeholders — including NGOs, civil society, business groups, and parliamentarians — were engaged during the development of the NDC, and that food systems experts have (at least informally) informed the goals of the NDC.<sup>30</sup> Informally, the NDC has also considered research conducted by academics and other stakeholders, although this has not been communicated transparently in the NDC. This informal approach to consulting civil society, the private sector, and academics (which can thereafter be complemented by more formal due diligence processes) is also the approach typically taken for developing food systems policies in the U.K.<sup>31</sup>

## AREAS FOR IMPROVEMENT

**Clarify whether the development of the NDC was democratic and systems-based.** While the NDC appears to have been developed in a participatory manner, the exact process by which this took place is unclear from the NDC and its supporting documents. Clarifying how exactly the NDC was formulated can contribute to overall transparency and facilitate the identification of areas for improvement. For example, it is important to clarify whether a democratic approach — involving all relevant stakeholders, including those that work outside the food system but could be impacted by food system measures — was taken in developing the NDC. Such a democratic approach would ensure that different perspectives are considered in an inclusive manner. Similarly, it is important to clarify whether a holistic and systems-based approach was taken in

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\* These assumptions are not public (and therefore not subject to scrutiny), in contrast, for example, to the assumptions guiding the energy transition. During the energy transition, the U.K. government more clearly indicated which measures it would pursue, including which demand-side measures, supply-side measures, and regulation.

developing the NDC. This could involve explaining the extent to which expert input and research on food systems — as well as existing and planned policies — informed the NDC’s targets and measures.

**Streamline stakeholder engagement.** Interviews reveal that engagement with expert stakeholders was often informal. Streamlining engagement with food systems stakeholders during the formulation of the NDC can further foster a participatory approach to its development. In addition, it can ensure that consultations go beyond those held with stakeholders that are already involved in policy making, bringing new perspectives and innovation. This could involve targeting individuals through active recruitment (for example, via calls for evidence); the CCC’s consultation process can serve as an example. Relevant food systems stakeholders include health, nutrition, energy, and supply chain experts, as well as NGOs, civil society, farmers, fishers, food processors, retailers, the Climate Assembly,\* marginalized groups, women, and smallholder farmers, among others.

**Improve ministerial coordination.** Although a coordination mechanism is in place, interviewees suggest that the development of the NDC would benefit from better coordination across ministries.<sup>32</sup> This could facilitate the identification of synergies and complementary policy goals, as well as the elimination of overlapping or contradictory policy interactions.

**Clarify the research that informed the NDC beyond its headline target.** While the NDC headline target is based on CCC advice and backed up by BEIS analysis, in contrast, the manner in which internal modelling informed the U.K.’s NDC on a sectoral level for food and agriculture is not clear to anyone outside government. Considering up-to-date research on the mitigation potential of the food system — and being transparent about how these considerations informed related targets — can provide valuable clarity in this regard and would result in better substantiated NDC targets. For instance, it is important to consider the research on the mitigation potential and health co-benefits of sustainable and nutritious diets conducted by academics in the field, as well as other food systems experts. The recommendations developed by the Climate Assembly are also a valuable input in this regard. In this context, it is key to specify exactly how the assumptions of the U.K. government differ from the modelling exercises conducted by the CCC, most importantly around diets. As reaching the U.K.’s long-term targets requires ambitious and far-reaching measures, the space for delivering the required emission reductions and removals without tapping into food consumption is getting increasingly smaller.<sup>33</sup>

**Align with Scotland’s indicative NDC.** The Scottish Government has put forward an “indicative” NDC, which delineates frameworks, commitments, and actions taken to mitigate climate change.<sup>34</sup> The indicative NDC is quite transparent about how it was developed, how it will be monitored, and how it will be financed. In fact, the indicative NDC was informed by a Citizens’ Assembly on climate change convened by the Scottish Government in 2019. In addition, the indicative NDC highlights the commitment by the Scottish Government to end hunger, achieve food security, improve nutrition, and promote sustainable agriculture. Following a similarly participatory and transparent approach as Scotland could build on best practices and result in enhanced ambition related to food systems.

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\* The Climate Assembly was convened by the U.K. government and took place between January and September 2020. The Assembly developed recommendations to strengthen and support the U.K.’s Parliament in its efforts to scrutinize the U.K. government’s climate change policies. For more information, access <https://www.climateassembly.uk/>.

## CONTENT OF THE NDC

TABLE 2: NDC CONTENT: KEY FINDINGS AT A GLANCE

### Key findings

- The U.K.'s NDC contains an economy-wide headline target, which is in line with the path to the U.K.'s Sixth Carbon Budget.
- The NDC is aligned with some food systems-related policies, including the U.K.'s Agriculture Act, the National Food Strategy, Scotland's 2020 Programme for Government, and the F-gas Regulation.
- The NDC and its underlying policies account for some externalities that apply to food systems.
- The NDC includes measures that aim to grow investment opportunities that consider sustainable food systems.
- The NDC highlights education and skill development as crucial policy areas for the U.K.'s overall approach to climate action.
- While not included in the NDC, it is important to highlight that the U.K. National Health Service (NHS) has committed to two emission reduction targets.
- While published after the NDC, the U.K. Net Zero Strategy lacks specificity on food and agricultural measures.

### Areas for improvement

- Account for the co-benefits and trade-offs of shifting toward sustainable food systems across ministries/sectors.
- Account for the emissions and associated deforestation in imported commodities.
- Include concrete targets and measures related to agroecology and regenerative agriculture.
- Clarify how overarching ambitions such as social justice and gender equality are considered in pursuing food systems targets.
- Include measures to facilitate a dietary transformation.
- Include measures to direct public finance toward sustainable food systems and to break from harmful subsidies.
- Include commitments made in the context of the Global Methane Pledge, Glasgow Leaders' Declaration on Forests and Land Use, and the Policy Action Agenda for Transition to Sustainable Food & Agriculture.

### The economy-wide headline target of the NDC is to reduce GHG emissions by 68% by 2030

**compared to reference levels.** The NDC does not delineate detailed measures for achieving this headline target, but rather notes that the delivery of the NDC will draw on both existing and forthcoming policies and measures. Policies relevant to food systems are also mentioned, suggesting that food systems were considered in developing the NDC. Consequently, the delivery of the NDC could be expected to be in line with the following policies relevant to food systems:

- *U.K.'s Agriculture Act*, which includes an obligation to develop a domestic and international food security report every 3 years.<sup>35</sup>

- *National Food Strategy*, which underpins the U.K.'s commitment to delivering a shift to healthy diets supported by a sustainable food system.<sup>36</sup> Interviews indicate that the Strategy was developed following a food systems approach and will likely be crucial for engagement with smallholder farmers.<sup>37</sup>
- *The Sustainable Fisheries Policy*, which the U.K. has committed to developing in its National Adaptation Programme.<sup>38</sup> The policy will give due consideration to climate change and will aim to build ecological resilience and protect natural carbon stores. The policy — as well as the U.K.'s wider efforts to sustainably use, protect, and restore its marine environment — are underpinned by the Fisheries Act,<sup>39</sup> the Joint Fisheries statement that is currently under development,<sup>40</sup> and a commitment to coherently manage the U.K.'s network of Marine Protected Areas, among others.
- *The Resources and Waste Strategy*, which promotes a move toward a circular economy that minimizes waste, including cutting down on food waste.<sup>41</sup>
- *Scotland's 2020 Programme for Government*, wherein the Scottish Government commits to developing a local food strategy, following the recognition that transitioning to net zero will involve significant lifestyle changes.<sup>42</sup>
- *F-gas Regulation*, which is currently being reviewed.<sup>43</sup> It will delineate measures to replace hydrofluorocarbon use in refrigeration equipment for food storage and distribution with climate-friendly, energy-efficient alternatives.
- *Ten Point Plan*, which sets out an ambitious plan for a green industrial revolution that considers sustainable food systems and the creation of green jobs.<sup>44</sup>

It is important, however, to highlight that the policies mentioned in the NDC are only included as “contextual aspirations,” indicating that a strong commitment to leveraging them in the implementation of the NDC is not present.

**The NDC accounts for some externalities that apply to food systems.** For example, both the U.K.'s National Food Strategy and Scotland's local food strategy are expected to account for the co-benefits and trade-offs of food systems transformations.<sup>45</sup> The National Food Strategy emphasizes the current negative externalities of the U.K. food system (such as inequality, environmental impacts, harm to animals, and the public health impacts of poor diets) and puts forward plans to address them.<sup>46</sup> In addition, the commitment to a shift toward healthy diets implicitly recognizes the health co-benefits of sustainable and nutritious diets.

**The NDC includes measures that aim to grow investment opportunities.** For example, the Ten Point Plan aims to allocate grants to farmers to invest in modern technologies and enhance Environmental Land Management Schemes (ELMS).<sup>47</sup> These ELMS are intended to incentivize land management actions such as tree planting and peatland restoration.

**Education and skill development are mentioned in the NDC as crucial policy areas for the U.K.'s overall approach to climate action.** It is not clear from the NDC, however, whether educational efforts will apply to efforts to catalyze a food systems transformation. In addition, and as noted before, the measures to ensure that both education and skills development are integrated in the delivery of the NDC are not transparently communicated.

**While not included in the NDC, it is important to highlight that the U.K. National Health Service (NHS) has committed to two emission reduction targets.** These targets involve reaching net zero for the emissions that the NHS can directly control and those they can influence by 2040 and 2045, respectively.<sup>48</sup> The targets have direct bearing on the U.K.'s food systems, as they include measures to reduce food waste as well as a measure to switch to plant-forward diets. Efforts to address food waste are currently focused on improving the NHS's understanding of the drivers of food waste in hospitals and canteens, with plans to develop appropriate interventions to target specific drivers.<sup>49</sup> There are also efforts to reduce food loss and waste across the NHS' supply chains; for example, by requiring NHS's suppliers to currently disclose — and later decrease — their scope 1, 2, and 3 emissions that relate to food loss and waste.<sup>50</sup> In turn, the NHS is looking at menu engineering (for example, by developing delicious plant-based recipes and increasing the use of healthy as well as locally and sustainably sourced ingredients) to nudge people to make dietary choices that are healthier, more sustainable, and more equitable.<sup>51</sup> The NHS's efforts to reduce emissions through food systems measures builds on the findings of the Hospital Food Review and involves collaboration with NHS caterers, dieticians, and suppliers.<sup>52, 53</sup>

**While published after the NDC, the U.K.'s Net Zero Strategy lacks specificity on food and agricultural measures.** The U.K.'s Net Zero Strategy (published in October 2021) functions as a sort of blueprint for delivering the NDC.<sup>54</sup> The Strategy focuses largely on decarbonization and peat restoration, and critics have pointed out that it fails to address emissions from U.K. food systems.<sup>55</sup> For example, the measure of success for the agricultural sector — which is the share of farmers in England engaged in low carbon practices, not further specified in the Strategy — is likely too vague and unambitious to be fit for purpose.

## AREAS FOR IMPROVEMENT

**Highlight the co-benefits of food system measures.** The importance of a shift toward healthy diets supported by sustainable food systems is recognized in the NDC. Nevertheless, there is value in accounting for these co-benefits and trade-offs more clearly. The COVID-19 pandemic, for instance, has highlighted the interlinkages between obesity and severe illness (and associated healthcare costs) clearly. This presents an important opportunity for making the case that shifting diets can provide important co-benefits, such as reducing severe illness, combating health crises, reducing healthcare costs, and improving climate resilience and food security, among others.<sup>56</sup> The NDC does make mention of co-benefits for other mitigation priorities. For instance, reducing air pollution is recognized as a key co-benefit of upscaling renewable energy. The same approach could be applied to advocate for healthy and sustainable diets. Beyond health, transforming the U.K.'s food systems can deliver other important co-benefits by creating social value through more localized food production and contribute to biodiversity protection, while efforts to reduce food loss and waste have economic co-benefits.<sup>57</sup>

**Account for emissions and associated deforestation generated in the production of imported commodities.** It is important to note that efforts to increase the sustainability of the U.K.'s food systems may have knock-on effects for the food systems of different countries. For example, if the U.K.'s agricultural sector were to become more sustainable, this may reduce the amount of food that can be produced domestically and may thus require more imports, potentially from countries with less stringent agricultural regulations.<sup>58</sup> By accounting for emissions and associated deforestation generated in the production of imported

commodities, the U.K. could commit to more comprehensive NDC targets following the recognition that the footprint of the U.K.'s food system reaches beyond its borders. This could be achieved, for instance, by taking a production- and consumption-based approach in emission accounting. In this way, a global perspective can be applied to ensure that efforts to increase the sustainability of the U.K.'s food systems do not displace production to other countries. An important first step has been achieved with the introduction of the Environment Bill,<sup>59</sup> which, if passed, would make it illegal for firms to use produce from illegally deforested lands.

**Clarify how overarching ambitions relate to food systems.** The NDC refers to a number of overarching ambitions for which it would be important to clarify whether they relate to the U.K.'s food systems specifically as well as which proportional contribution is expected from the food systems in that regard. For example, it is unclear whether any of the 250,000 green jobs pledged via the U.K. Prime Minister's Ten Point Plan are allocated to people working in food systems. Green jobs are key for guaranteeing equitable outcomes for those impacted in a food systems transformation. Similarly, while social justice and gender equality are mentioned as overarching considerations, it is important to clarify whether and, if so, how these elements will be considered in planning the implementation of food systems targets.

**Include measures to support agroecology and regenerative agriculture.** Despite their importance, the NDC does not include any concrete targets and measures (or reference to policies with clear targets and measures) that focus on regenerative agriculture and agroecology. Promising measures to incorporate in the following NDC could include building the capacity of supply chain actors, providing education on nutritious and healthy foods, implementing the ELMS, providing financial incentives for sustainable land management practices and green jobs in supply chains, addressing food waste at the level of retailers and food providers, and eliminating contradictory policy interactions that promote unsustainable use of land, among others. Notably, expanding the ELMS to encompass later stages of the supply chain (beyond production) can provide incentives for supply chain actors that are not yet included in these schemes. It is important to note, however, that local food procurement may be challenged by the fact that local farmers may not be able to guarantee continuous food supply, although initiatives exist to bring suppliers together and develop comprehensive strategies to ensure consistent food supply.<sup>60, 61</sup>

**Include measures to facilitate a dietary transformation.** While a target to shift diets exists, the NDC does not include (or refer to) any measures for reaching this target. Developing (or clarifying already existing) measures to facilitate a dietary transformation would serve to substantiate this target. Measures could include limiting advertising and marketing for unhealthy foods, providing education plans on nutrition and health, reflecting the real price of foods along the supply chain, and highlighting the interlinkages between diets and health (that is, associated health risks with unhealthy diets), and should be based on the global recommendations for healthy and sustainable diets developed by the EAT-Lancet Commission.<sup>62</sup>

The U.K. provides guidance on healthy and sustainable diets through the Eatwell guide,<sup>63</sup> but adherence is low.<sup>64</sup> Further encouragement is needed to catalyze a transition to healthy and sustainable diets, with fiscal measures, subsidies, and carbon taxes offering potential solutions. In fact, the National Food Strategy puts forward 14 recommendations to promote a dietary shift, which should be included in subsequent NDCs. The recommendations include introducing a sugar and salt reformulation tax, mandatory reporting requirements for large food companies, a rural land-use framework, minimum standards for trade, and a 50 million GBP

(67.8 million USD)\* investment to build, fund, and support the development and scaling up of new sources of alternative protein. Alternative proteins have a high potential to displace processed meat products (which comprise approximately half of all the meat consumed in the U.K.) and have a notably smaller environmental footprint and a similar to moderately better health impact in comparison to red meat.<sup>65</sup> As such, funding in alternative protein is a significant opportunity in the U.K., especially if increasing the price of animal products is seen as politically unfeasible. Indeed, while the Strategy sets the goal of reducing meat consumption by 30% by 2030, which is consistent with advice put forward by the CCC, only nudging measures have been included to this end.<sup>66</sup> A meat tax, while considered, was ultimately excluded for being “politically impossible.” Efforts to increase the political feasibility of a more transformative approach to diets — for example, through awareness-raising campaigns and the nudging measures included in the Strategy — could pave the way for more ambitious measures to be included in subsequent NDCs. Healthcare workers can be important agents of change in this regard, as advice from a nurse or doctor is likely to be seriously considered and because nurses and doctors interact with patients and their families in canteens at mealtime and can lead by example.

**Include measures to direct public finance toward sustainable food systems and to break from harmful subsidies.** While the NDC does not appear to consider the finance that is required to achieve it, public finance is an important precondition for implementing an NDC and facilitating food systems transformation alike. In this context, the U.K. should consider developing measures to direct public sector finance toward ecologically beneficial forms of farming, healthy diets, and resilient livelihoods and communities. This could include allocating finance to support rural livelihoods and community food production. Similarly, it is important to break from subsidies that overlap or are inconsistent with sustainability and health targets related to food systems. While, in theory, the removal of harmful subsidies is to be covered by the above-mentioned ELM schemes, industry representatives have expressed their concern at the rapid decrease in direct support for farmers and the implications for rural communities, as well as the lack of clarity in the implementation of these schemes and the amount of funding they will provide.<sup>67</sup> A more coherent approach to redirecting subsidies is therefore needed. Further integrating food systems in the implementation of the Ten Point Plan is another valuable opportunity for scaling up investment options. For instance, the budgeting for education and skill development should also consider food systems. In addition, it should be clarified whether the NDC goal to mobilize 36 billion GBP (48.8 billion USD) in private sector investments by 2030 takes food systems into account.

**Integrate the commitments made in the context of the Global Methane Pledge, Glasgow Leaders’ Declaration on Forests and Land Use, and the Policy Action Agenda for Transition to Sustainable Food & Agriculture.** The U.K. led and endorsed several pledges and initiatives announced during COP26 in Glasgow (but outside the official United Nations Framework Convention on Climate Change regime). These pledges, if fully and adequately implemented, have the potential to accelerate the U.K.’s shift toward sustainable food systems, in particular through measures that promote sustainable trade and address embedded methane emissions and deforestation in food imports, as well as through repurposing public policies to support regenerative agriculture practices while improving overall food systems resilience. But to ensure progress, transparency, and accountability, it is crucial that these international commitments and respective actions be fully integrated and anchored into the U.K.’s NDC.

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\* Conversions based on February 2, 2022, exchange rates.

## IMPLEMENTATION OF THE NDC

TABLE 3: NDC IMPLEMENTATION: KEY FINDINGS AT A GLANCE

### Key findings

- While not mentioned explicitly in the NDC, interviews reveal that the CCC is expected to play an important role in monitoring progress in NDC implementation and achievement.

### Areas for improvement

- Clarify how the NDC will be implemented and how implementation will be monitored.
- Pursue cross-sectoral collaboration during NDC implementation and monitoring.
- Ensure that relevant stakeholders are consulted during NDC implementation.
- Consider, during monitoring, inputs from relevant food systems stakeholders.
- Convene regular national food systems dialogues and co-host or participate in international food systems conferences, such as the recently convened United Nations Food Systems Summit.

**The U.K.'s NDC does not specify how it will be implemented and monitored.** As a result, the U.K.'s NDC does not contain any specific implementation and monitoring measures. Interviewees also indicate that no significant efforts have been undertaken so far toward the implementation and monitoring of the U.K.'s NDC.<sup>68</sup> Nevertheless, several of the key policy documents promised in the U.K.'s NDC have since been published, such as the National Food Strategy, which is expected to be particularly relevant for transforming food systems. Beyond this, at the time of writing, we are not able to assess which actions have been undertaken toward the implementation and monitoring of the NDC.

**While not mentioned explicitly in the NDC, interviewees reveal that the CCC is expected to play an important role in monitoring progress in NDC implementation and achievement.**<sup>69</sup> The CCC conducts regular appraisals on whether the policies that have been developed to reach the U.K.'s climate targets are sufficient, whether the implementation of these policies is progressing as planned, and the emission reductions and removals these policies have contributed to. The results of these appraisals are shared with Parliament, who then scrutinizes progress made. As the NDC headline target is aligned with the Sixth Carbon Budget and the U.K.'s long-term net zero target, the CCC's appraisals will also gauge progress in terms of NDC implementation and achievement.<sup>70</sup>

## AREAS FOR IMPROVEMENT

**Clarify how the NDC will be implemented and how implementation will be monitored.** Inclusive and participatory governance should be central to the implementation and monitoring of the U.K.'s NDC. It is therefore crucial to clarify how and by which coordination mechanism the NDC will be implemented, and similarly how the implementation will be monitored. As lay audiences may not have access to interviews with key stakeholders, the exact role of the CCC in monitoring NDC implementation should be detailed in the U.K.'s NDC. More specifically, it is important to clarify whether any targets and milestones of implementation will be monitored, and which indicators are used in this context. Interviewees indicate that the CCC is seeking to refine the metrics that are used to appraise progress in reducing food systems emissions.<sup>71</sup> Efforts are now taken to further accommodate the different interrelationships between food systems actors and elements in the CCC's appraisal metrics, which are already quite sophisticated.

**Pursue collaboration across sectors and devolved administrations during NDC implementation and monitoring.** Food systems measures extend across ministries and departments, and many matters that relate to food systems are devolved; that is, they are not determined at the U.K. level but rather decided by the devolved administrations of England, Scotland, Wales, and Northern Ireland.<sup>72</sup> This complicates the monitoring of progress in implementing and achieving the U.K.'s NDC, and warrants close coordination across ministries and devolved administrations during NDC implementation and monitoring.<sup>73</sup> In this context, NDC implementation and monitoring should involve all relevant ministries at the U.K. level and across the devolved administrations, and seek to enhance both institutional and sectoral capacities to achieve synergies and remove inconsistencies.

**Consult stakeholders during implementation.** The policies that underpin the implementation of the NDC are largely the result of participatory processes that consider different stakeholders. Notwithstanding, it is important to ensure that women, farmers, youth, and other vulnerable groups, as well as bodies such as the Climate Assembly that represent citizens, will also be consulted during the implementation of such policies.

**Consider inputs from food systems stakeholder inputs during monitoring.** Similarly, clarity is needed on the metrics and measurements used to measure emission reductions from the agricultural sector. Notably, monitoring should consider inputs by academics, NGOs, and farmers, with the aim of guaranteeing that third-party verification takes place. In addition, it should be clarified whether and, if so, how the NDC aims to ensure a fair distribution of impacts across its society.

**Convene regular national food systems dialogues and co-host or participate in international food systems conferences, such as the recently convened United Nations Food System Summit.** Collaboration at the national level, as well as across regions, sectors, and countries, is helpful for sharing best practices, and can support the integration of different perspectives and lessons learned in the implementation of the U.K.'s NDC. The recently convened United Nations Food System Summit and associated Member State Dialogues offered valuable opportunities in this context. For example, organizing Member State Dialogues involved appointing a Member State Dialogue Convenor and developing national food systems transformation pathways in a process that was rather similar — and thus likely complementary to — the NDC formulation process.<sup>74</sup> In this process, inputs from various stakeholders were included;

for instance, the National Food Strategy team was involved in incorporating inputs from young citizens in its submission.<sup>75</sup> The U.K.'s participation in the Food System Summit also included the appointment of Ananda Guha as National Convenor; the organization of several Member State Dialogues; the preparation of a U.K. National Pathway document; as well as a video statement by the U.K. Minister for Pacific and the Environment.<sup>76</sup>

## CASE STUDY SUMMARY

### Food Foundation, United Kingdom

The Food Foundation, a U.K. food policy charity, has been instrumental in several campaigns aimed at ensuring all children across the U.K. have access to healthy, affordable food. This included a Children's Future Food Inquiry, a year-long investigation into children's food across the U.K., which involved 392 children and young people in developing a Children's Right2Food Charter, published in 2019. This Charter captures the key recommendations on how government policies and programs can better support children to eat well in pre-school settings, at school, and at home. It sets out a plan to tackle children's food insecurity and inequalities in obesity and to protect every child's right to food. Recommendations focus on a variety of policy approaches that address food environments, access and affordability of healthy foods, and procurement standards. These include:

1. Providing free nursery meals to all children who are entitled to free childcare.
2. Expanding the School Fruit and Vegetable Scheme (SFVS) so all school children can benefit (primary and secondary).
3. Introducing mandatory food standards in all nurseries within the U.K.
4. Expanding the Healthy Start voucher scheme by increasing the voucher value and increasing the number of children who benefit.
5. Making laws that take food costs into account when considering changes to support or wages for families to unlock the constraints of poverty.
6. Developing guidance for food education in schools, including learning about food poverty, how it can be solved, and the right to food in the curriculum.

The Food Foundation also brought together a panel of Young Food Ambassadors who help inform the Foundation's work and support the campaign for change. This work is widely cited in the U.K. Parliament and has attracted huge media coverage. To complement the campaign, a children's Right2Food Dashboard provides a comprehensive picture of children's food across England by bringing together data from multiple sources. It particularly focuses on dietary and health inequalities. It helps users visualize children's consumption patterns and the food environments that determine what children eat and have access to.

This case study demonstrates the importance of an inclusive and transparent approach to stakeholder consultations and the power of engaging those actors with lived experiences — those most impacted by a project, initiative, and/or policy. The involvement of young ambassadors, disadvantaged groups, and children impacted by food poverty, who worked alongside parliamentarians and other experts through the development of a Right2Food Charter, meant policies were identified that were relevant to and met the needs of the intended beneficiaries.

Tackling dietary inequalities, the root causes of food poverty, and other social justice issues will be key to meeting the U.K.'s climate change targets. A dietary transformation, focusing on access and affordability of healthy and nutritious foods, encouraging the consumption of a great proportion of fresh fruit and vegetables, will also need to be a key component within the U.K.'s NDC.

Further information and access to the detailed case study can be found [here](#).

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