

## **Belfast City Council DRAFT response to the DAERA proposed Northern Ireland Food Strategy Framework.**

### **Q1 –**

Strongly agree.

### **Q2 –**

We believe this is a prudent step and sensible approach which will help achieve a more sustainable pattern of production, consumption and waste in line with the Circular Economy. We note that production systems are a major issue for agriculture, in terms of how our food is grown and produced, as well as the associated environmental impacts.

Many components of the food system are interdependent, and a co-ordinated approach will help to align food polices and wider considerations.

It should also help to address some of NI's ongoing political and economic uncertainty in the context of EU Exit. However, it will be important that the strategy consider and address the prevailing public consumerist culture, as well as unsustainable business ideals of continual or unlimited economic growth.

### **Q3 –**

This seems to be an appropriate and sensible approach.

### **Q4 –**

We note that the Circular Economy Strategic Framework and the Agricultural Policy Framework are already included. However, there is no reference to the new NI Biodiversity Strategy which is essential given the ecosystems services food production is reliant upon. The Food Strategy should also link with the Environment, ammonia, marine, peatland strategies etc. In addition, there must be linkages to existing legislation such as the Habitats Directive and Water Framework Directive and any future climate or nature based legislation.

We would also highlight the need for developing and delivering localised plans, (such as regional Waste Plans, Local Development Plans and the Belfast Region City Deal) in line with this strategic framework. We therefore suggest that consideration is given to how best the NI Food Strategy Framework could permeate through to such plans.

### **Q5 –**

We believe that it would be beneficial to aim for NI becoming (more) self-sufficient in terms of food supply; this would help ensure food security, move us towards a local circular economy and mitigate climate change (by reducing transport). We would also suggest adopting a zero-waste approach within the ambition statement.

We recommend that the document should outline clear definitions (perhaps in the glossary) and provide examples of “world class” and “award winning quality”

In addition, the ambition states “respect for the environment” but we believe this is not sufficient given the reliance of food systems on the natural environment. We

believe this should be strengthened to include protection and restoration of natural resources and ecosystem services.

**Q6 –**

The scope of the strategy should not end at society but rather adopt a full life cycle “soil-to-soil” approach. It should also incorporate application of the Food Hierarchy (Minimise, Redistribute/Share - human, then animal and Recycle/Compost) in it’s drive towards zero waste.

The strategy would appear to be very inward focused and only seems to address locally produced food; should it not also address imported food and the impacts associated with this?

**Q7 –**

We welcome the emphasis on a food system that protects natural resources for future generations and is economically and environmentally sustainable.

It would also be worthwhile adding “**enhances / promotes and**” wording before “*protects natural resources for future generations...*” So: “A transformed food system **that enhances, promotes and protects natural resources** for future generations, is economically and environmentally sustainable and provides safe, nourishing, accessible food to people, who make informed healthy choices.

It would be beneficial to aim for NI becoming more self-sufficient in terms of food supply; this would help ensure food security, move us towards a local circular economy and mitigate climate change (by e.g. reducing transport).

Could it be considered to reword the vision slightly from “*...and provides safe, nourishing, accessible food to people, who make informed healthy choices*” as this could be interpreted as only being targeted to those people making healthy choices when it should be aimed at everyone?

**Q8 –**

If the NI Food Strategy Framework aims to be a cross government unifying strategy, it should be mindful of the work currently being undertaken by DAERA to develop a Waste Collections Consistency Framework. Food waste is being addressed within the development of this statutory Framework and the NI Food Strategy should be consistent with the approach adopted by DAERA.

Also, consideration should be given to The Food Waste Regulations (NI) which stipulate that households must have a food waste collection scheme. (Indeed, in our research, through pilots conducted within Belfast, the weekly, separate food waste collections have performed better than the fortnightly mixed organic waste collections).

The Food waste Regulations (NI) also require businesses producing food waste to separately store this waste so that it can be recycled/composted. To date there has been little enforcement (if any) of these regulations. It would be beneficial to fully apply existing legislation before introducing further legislation which again may not be enforced.

**Q9 –**  
Agree

**Q10 –**

The section in relation to Strategic Priority 5 states that it is strongly linked to Strategic Priorities 1 and 3. Strategic Priorities 1 and 5 seem so strongly linked that they could potentially be merged. Strategic Priorities 2 and 6 could both include the aim of becoming more self-sufficient as discussed earlier.

A clear definition of what is meant by “food conscious society” (Strategic Priority 3) could be included within the document glossary.

We welcome the inclusion of Strategic Priority 4 protecting and enhancing our natural resources however, we are disappointed there is no reference to ecosystem services upon which food systems are completely dependent. There is only a cursory reference to an emphasis on nature friendly farming practices. Details on natural resource protection should include emphasis and details on ecosystem services. Key examples include soil formation, pollination, nutrient cycling, water regulation and purification.

Similarly, the lack of emphasis on ecosystem services is apparent in Strategic priority 6 where there is no mention of soils, pollinators, pests, diseases, or invasive alien species. As over one third of bee species on the island of Ireland are at risk of extinction, this is a key risk. A focus on ecosystem services is essential to ensure food security and a thriving, sustainable Northern Ireland food system.

**Q11 –**

Consideration could be given to the following topics and examples for inclusion within the strategic priorities:

- Self-sufficiency and grow-your-own (both at home and at community level, such as community gardens and initiatives).
- Food wasted through the production cycle and waste reduction initiatives such as “Wonky Veg” ranges (that are perfectly good to eat but perhaps not typical in appearance), At the very least, to direct this material to food banks/food distributions systems to alleviate food poverty.
- An emphasis on affordable fresh food and vegetables available to everyone.
- Agriculture production systems which are based on provision of public goods, ecosystem services rather than food productivity.
- Impacts of agriculture - Agriculture is currently the largest source of greenhouse gas emissions across NI (27%) in 2018. It is also the sector with the largest proportion of substantiated water pollution incidents in 2019 (36.5% of the 1,754 substantiated incidents) \*
- Emphasis on organic farming.
- Agriculture – promote use of non-peat based compost systems e.g. NWP compost made from organic waste. (“Close the loop”).
- Consideration to (even a marginal) reduction in meat consumption (and the added benefits to health and the environment that this could bring). But doing so in a fair and just manner.
- School food education – The main focus currently would appear to be on dietary and healthy requirements, but it should also cover using up leftovers

(use by dates), redistribution channels and finally recycling/composting as opposed to landfill

- Transparency with regards to food contents and production methods
- Reporting mechanisms for all participants of the food supply chain

**Q12 –**

The guiding principles seem to be comprehensive and appropriate, but we would request clearer definition of what is meant by a single supply chain or why it would be desirable (guiding principle 8).

**Q13 –**

Again, we would emphasise the importance of a life-cycle approach and to promote a “soil-to-soil” principle, (going beyond the farm-to-fork concept), incorporating a closed loop food system approach.

**Q14 –**

Agree.

**Q15 –**

We would reiterate the point that it would be good to aim for NI to become more self-sufficient in terms of food supply. The framework should be informed by advice and information on food and the circular economy from organisations such as WRAP, The Ellen MacArthur Foundation and Circle Economy.

**Q16 –**

The proposed approach to implementation seems reasonable, providing that there are regular reviews within the five year period, considering local and global conditions and emerging legislation, as well as stakeholder consultations on the proposed actions. The strategy should be robust and resilient. It should also be designed and implemented in such a way to withstand any political instability such as changes within government, including the NI assembly.

**Q17 –**

We note that the Green Growth Strategy is not finalised and has an emphasis on increased production.

It may be of concern that this Food Strategy could potentially be weakened if the Food Programme Board were to sit within the governance arrangements of the Green Growth Strategy.

We would reiterate our point made, to Q16, around stability and we would emphasise that political resilience should be incorporated into the governance arrangements.

**Q18 –**

Any future arrangements for engagement with stakeholders should include regular reviews of appropriateness of the visions, goals and plans etc.

**Q19 –**

As many engagement platforms as reasonably possible should be considered, to take into account the range of sectors, communities and individuals affected by the proposals.

**Q20 –**

Yes. The strategy should also consider including an explanation of which UN Sustainable Development Goals (in Figure 5) that it contributes to (perhaps all of them) and an outline of how it contributes to each of these. In addition, there should be reference to potential to deliver ecosystem services, public goods to society.

**Q21 –**

Not at this point

**Q22 –**

Not at this point

**Q23 –**

As outlined under Q10 and Q11 the impacts of the Agricultural sector need to be addressed with specific reference to water pollution, air pollution (ammonia), biodiversity loss and greenhouse gas emissions in particular.

The omission of ecosystem services is of key concern given the fundamental reliance of the sector on the natural environment. Coupled with pollution, unsustainable production practices jeopardise the entire sector and Northern Ireland's food security. Restoration of ecosystem services is required as an underlying principle for the strategy.

**Q24 –**

Not at this point

\* NI Environmental Statistics Report 2021 <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2021.pdf>