

SUSTAINABLE DEVELOPMENT: A DISCUSSION PAPER

Issue

1. This paper sets out the key issues in relation to Government's approach to sustainable development, and its incorporation into the work of the Food Standards Agency. The paper provides background information to support a preliminary Board discussion on sustainable development.

Strategic Aims

2. In its Draft Strategic Plan 2005 – 2010, which is currently out for consultation, the FSA indicated that it supported the Government initiative putting sustainable development at the heart of policy and decision making. The Board will wish take account of the outcome of this consultation before reaching a view.

Background to sustainable development and activities of other Government Departments

3. It is Government policy that all Departments integrate sustainable development principles into all of their activities and policies. There are two elements to this. These are, considering the sustainability of how the Department manages its business (eg estates management, the Department as an employer) and how the Department fulfils its remit (eg policy and decision making functions). In Wales the Welsh Assembly Government has a statutory duty to promote sustainable development.
4. One widely used definition of sustainable development is, “development which meets the needs of the present without compromising the ability of future generations to meet their own needs” (Annex A). Sustainable development encompasses four pillars:
 - environmental protection;
 - social progress;
 - prudent use of natural resources;
 - economic growth and employment.
5. To be “sustainable”, operational business activities and policies should ideally promote positive benefits in all of these areas. This will not always be feasible,

and a more realistic aspiration would be to ensure that policies promoting benefits in one area do not result in significant detrimental effects in others. This can be achieved by assessing different activities, policies and policy delivery options for their environmental, social and economic impacts so that the most sustainable option can be identified.

6. The Government's sustainable development strategy was launched in May 1999 in the White Paper, "A better quality of life". This strategy is currently under review and on 21 April 2004 Ministers launched a major consultation exercise. The review proposes a renewed impetus of action on sustainable development, including to "embed sustainable development more effectively within government action and policy-making". In the light of devolution, the UK Government and the devolved administrations intend to work together to produce a new UK-wide strategic framework for sustainable development, supported by more detailed strategies and action plans produced by each administration. The target is to have a new UK strategic framework and UK Government Strategy in place by spring 2005.

Policy making and development

7. In developing their policies Government Departments have previously used a number of policy analysis mechanisms, such as Regulatory Impact Assessments (RIAs), that incorporate an analysis of costs and benefits. However, none of these analyses covered all aspects of sustainable development in an integrated manner. It was therefore important to develop within Government a system to embed sustainable development into policy and decision making. The system developed was the Integrated Policy Appraisal (IPA) Framework. Seven Departments, including the Department of Environment, Food and Rural Affairs (Defra) and the Department of Health, have piloted IPA on a range of policy issues. The first year of piloting ended in late 2003 and indications are that some further development work is needed, but that IPA has many positive aspects.
8. IPA is based on a set of questions that covers all aspects of sustainable development together with questions relating to how impacts may be distributed across different groups of people (see Annex B). The Food Standards Agency's Consumer Committee has considered the IPA Framework in relation to whether it covers consumers' interests adequately. The outcome of their deliberations is at Annex C.

9. IPA can be applied in a number of ways, but the approach normally taken is to use the framework of questions to make an initial brief assessment of a policy or project proposal in the early stages of development. This screening identifies potentially significant impacts and can be particularly useful to distinguish between different policy delivery options. Where significant impacts have been identified these are then considered in more detail, including feeding them into any RIA.
10. The relationship between IPA and RIA has recently been further strengthened and clarified. In early April 2004, Cabinet Office announced new guidelines on RIAs. The revised guidelines require that RIAs be extended to include consideration of social and environmental impacts, as well as economic costs and benefits. This means that sustainable development is fully incorporated within RIAs. Departments can choose how to undertake the assessments, however it is recommended that sustainable development considerations be formally included through the use of checklists that reproduce the IPA Framework questions.

Estates Management

11. Cross Departmental guidance has also been developed to help Departments incorporate sustainable development into their estates management. The Government's Framework for Sustainable Development on the Government Estate covers aspects such as travel, water use, waste management, energy and procurement. It is expected to be expanded to include social impacts. The estates management guidance also encourages all Departments to work towards or implement environmental management systems (EMS) based, or modelled on, a recognised standard (ISO 14001).

Sustainable development and the Food Standards Agency

12. The following sections focus on the issues that are raised when considering sustainable development in the context of the Food Standards Agency's work, for the purpose of promoting discussion.

What contribution does the Agency already make to sustainable development?

(i) Estates management

13. In relation to managing its buildings the Agency has already taken action to conserve energy, to use electricity from renewable sources, and to reduce and

recycle waste. The paper used is made from 100% recycled paper. The Agency has taken account of the Government's Public Sector Food Procurement Initiative in tendering for its catering and will develop an action plan to work towards an Environmental Management Plan by autumn 2004 and will implement this over the next 2 years.

(ii) The Agency as an employer

14. As an employer the Agency promotes the social aspects of sustainable development by recognising the importance of a good work / life balance. Ambitious diversity targets have also been set. The Agency is already committed to benchmark its performance in managing its people against the Investors in People standard. The Agency has been recommended for liP accreditation in its recent final assessment and to enable further improvement there will be a continuous assessment process to ensure that the Agency continues to develop its performance. A new HR strategy is being developed to support the Agency in delivering its new strategic plan. The Agency will seek an external benchmarking of its HR strategy within the next 12 months to ensure that it is consistent with the social aspects of sustainable development.

(iii) The Agency's policy making role

15. The Agency contributes to sustainable development through fulfilling its remit in relation to food safety and standards, nutrition and helping consumers to make informed choices. For instance, by developing policies to protect peoples' health, either by working to protect food safety or by helping consumers to choose healthy diets, the Agency is directly contributing to the social progress pillar of sustainable development.

16. To be sustainable, however, policies and projects that promote social progress also need to be assessed for their environmental and economic effects to ensure that benefits to peoples' health do not cause unnecessary harm to the environment or to the economy. It is Government policy for all Departments to embed sustainable development within their work. In addition to the Agency's responsibility as a Government Department, it can be argued that it is in consumers' long term interests that Agency policies, decisions and advice are sustainable and do not compromise their future interests. The alternative is to take a shorter term or narrower view, which might provide greater benefits now, but cause difficulties for future generations of consumers. Currently the Agency's policy and decision making processes do not formally consider all aspects

necessary to ensure sustainability (see Annex B). This is why further policy development work in this area is needed.

A suitable mechanism

17. All Departments need a mechanism to allow consideration of sustainable development within policy development and decision making. One such mechanism is the Integrated Policy Appraisal Framework (IPA - see paragraphs 7 – 10).

A closer look at issues involved in embedding sustainable development into policy making

18. A key challenge facing any Department in relation to incorporating sustainable development into its policy development and decision making is to understand the relationship and potential tensions between the departmental remit and sustainable development. The Agency's remit is to protect consumers in relation to food safety and standards, help consumers to make informed choices, including in relation to nutrition and healthy eating. This naturally means that the Agency's focus, and expertise, is on certain aspects of sustainable development. However, to assess sustainability requires consideration of the whole spectrum of issues that are encompassed by sustainable development (see Annex B).

19. It is possible that in particular cases the best option to protect consumers may not be the most sustainable option. This means that judgements would have to be made on what the most appropriate compromise is, between, for example, the interests of public health protection and the environment. Although the Agency already undertakes cost / benefit considerations the scope of the considerations would need to be significantly widened. This might suggest that incorporation of sustainable development is too difficult. However, it may be better to undertake an imperfect consideration covering all of the issues, than to potentially miss important consequences.

20. Another directly related issue is whether in making judgements about the different aspects some issues should be given more weight than others should. One view would be that there should be an equal balance between social, economic and environmental issues. However, this might be too restrictive an interpretation. The Sustainable Development Commission has suggested a hierarchy as follows:

- protect critical natural capital in all circumstances;

- wherever possible, seek to optimise economic, social and environmental benefits over time;
- where that is not possible, seek to minimise any potential damage to the environment, people and their communities;
- only then can one trade off potential economic benefits against unavoidable social and environmental disbenefits.

Views on this are being sought as part of Defra's consultation on the new sustainable development strategy. Whether this is the appropriate hierarchy for the Agency should be considered. Any hierarchy involves making judgements about the relative importance of the different aspects of sustainable development. In terms of the Agency's remit, the first consideration would be the Agency's primary objective of protecting consumers.

21. The more important issues therefore are,

- the importance of sustainable development to the Agency (paragraphs 3 & 5);
- the need for further policy development work to ensure sustainability (paragraph 16);
- the need for a suitable mechanism to allow for individual policies and projects to be assessed (paragraph 17);
- the possibility that the best option to achieve the Agency's objective may not be the most sustainable and the difficult judgements this would entail (paragraph 19);
- whether some aspects of sustainable development should be given more weight than others (paragraph 20).

Next steps

22. It is suggested that the Board returns to this issue once the outcome of the consultation on the Draft Strategic Plan is known. At that time the Agency's position on sustainable development can be firmed up and in particular process mechanisms to embed it within policy making decided. In the Draft Strategic Plan it is suggested that there should be a second consultation to consult stakeholders about the best way to embed sustainable development more fully into the Agency's policy development and decision making. The suggested second Board

paper would also be an opportunity for the Board to consider proposals for this further consultation.

Action

23. The Board is asked to:

- **note** the background information;
- **discuss** the issues raised (see paragraph 21 for a summary) and offer preliminary views;
- **request** a paper in October so that the Agency's position can be developed further taking into account the outcome of the consultation on the Strategic Plan.

WHAT IS SUSTAINABLE DEVELOPMENT?

In its White Paper of May 1999 the Government set out its strategy for sustainable development as having four main aims:

- social progress which recognises the needs of everyone;
- effective protection of the environment;
- prudent use of natural resources;
- maintenance of high and stable levels of economic growth and employment.

The Government's policy is that sustainable development should be at the heart of, and built into, all Government Departments' policies and decisions. This includes decisions about estates management and Departmental responsibilities as an employer. To factor in sustainable development to all of its work Departments are expected to take account of a list of guiding principles. The following table indicates where the Agency already makes significant contributions to the principles.

Sustainable Development	
Government Guiding Principles	FSA Policy
Putting people at the centre	Our No.1 core value is to put consumers first
Taking a long term perspective	We are forward looking; the strategic plan aims to anticipate future challenges to food safety and health
Taking account of costs and benefits	We manage food risks proportionately by balancing risks and benefits
Combating poverty and social exclusion	We give priority to initiatives which help disadvantaged and vulnerable consumers

The precautionary principle	We adopt a precautionary approach through action to protect and inform consumers
Using scientific knowledge	We take an impartial view based on the best available scientific evidence and advice
Transparency, information, participation and access to justice	We listen and develop our food policies openly and transparently; are honest with consumers and do our best to explain our decisions and advice in clear non-technical language

The remaining 3 guiding principles, which are of less direct relevance to the Agency are:

- creating an open and supportive economic system;
- respecting environmental limits;
- making the polluter pay.

Across Government progress is measured against a series of indicators. There is a committee of “Green Ministers” who oversee the policy. An annual progress report (Sustainable Development in Government) is produced to which all Departments are expected to contribute.

INTEGRATED POLICY APPRAISAL FRAMEWORK

This framework was developed by Government Departments to help policy makers assess policy development against sustainable development principles. Although it can be used as a stand alone policy appraisal mechanism, more recently it has been incorporated into the Regulatory Impact Assessment process.

(1) Screening questions for economic, social, environmental and cross-cutting issues

E C O N O M I C	Public accounts and public service	<ul style="list-style-type: none"> • Will the policy or project involve cost to exchequer funds? • Will it result in receipts or savings to the Exchequer? • Will it impose administrative or other burdens on public service providers, e.g. frontline staff in health, education, local government or criminal justice?
	Consumers	<ul style="list-style-type: none"> • Will the policy or project affect the cost, quality or availability of commercially available or publicly provided goods or services? • Will it result in a change in the choice available to consumers, or the availability of information to enable them to exercise choice? • Will it introduce a new technology or process that will make existing goods redundant over time?
	Business	<ul style="list-style-type: none"> • Will the policy or project impose or relieve a cost or burden on business, including small businesses, charities or the voluntary sector? Will it impact particularly on small businesses? • Will it result in a change in the investment in people, equipment, infrastructure, or other asset? • Will it result in changes to the structure of markets, or access to them?
S O C I A L	Public health and safety	<ul style="list-style-type: none"> • Will the policy or project enhance or harm health or safety at work, or affect the use of the work environment to maintain or improve health? • Will it affect health related behaviour such as diet, physical activity, alcohol, tobacco and drug consumption, sexual behaviour, excessive gambling? • Will it affect access to NHS services, including the use of preventative services such as health screening, immunisation, sexual health services? • Will it affect the use of the ability of people to return to work from illness (whether the illness is work-related or not)?
	Crime	<ul style="list-style-type: none"> • Will the policy or project affect the rate of violent and non-violent crimes? • Will it divert people away from or prevent crime? • Will it affect people's fears about being a victim of crime? • Will it create a new offence or create an opportunity for crime e.g. through fraud? • Does the policy create new investigative powers that could increase the risk of violence against public sector workers?

	Social capital, community and education	<ul style="list-style-type: none"> • Will the policy or project affect the number of people involved in voluntary and community activities? • Will it affect people's access to information or social networks? • Will it affect the availability of affordable homes of suitable quality? • Will it affect the capacity for parents/guardians to provide a stable environment for their children? • Will it affect the level of skills and education, in the workforce, among children, or otherwise? • Will it affect access to, and the range of, facilities for the arts, culture, sports and leisure pursuits?
E N V I R O N M E N T A L	Climate change	<ul style="list-style-type: none"> • Will the policy or project lead to a change in the emissions of any of the six greenhouse gases, for instance by consumption of fossil fuels? • Will it affect, or be affected by, vulnerability to the predicted effects of climate change e.g. flooding?
	Air quality	<ul style="list-style-type: none"> • Will the policy or project lead to a change in the emissions of air pollutants? • Will it result in greater or fewer numbers of people being affected by existing levels of air pollution? • Will it have a bearing on areas of existing poor air quality?
	Landscape	<ul style="list-style-type: none"> • Will the policy or project involve visually intrusive construction works? • Will it involve demolition or modification of historic buildings? • Will it impact on a location in such a way as to change its sense of place or identity in any other way?
	Land use, waste and water	<ul style="list-style-type: none"> • Will the policy or project consume a substantial volume of natural, non-renewable resources, including land? • Will it lead to a change in the volume of waste produced or to the way it is processed? • Will it affect the efficient use of energy or water? • Will it lead to an increase or decrease in water pollution? • Will this lead to an increase or a decrease in the number of people affected by water pollution? • Will it increase or decrease water abstraction or otherwise affect the flow, run-off or recharge of water?
	Biodiversity	<ul style="list-style-type: none"> • Will the policy or project involve disturbance or relief of disturbance to habitats or species by change of land use, light or noise? • Will it lead to severance, fragmentation, isolation or change in size of habitats?
	Noise	<ul style="list-style-type: none"> • Will the policy or project lead to increase or decrease in exposure to noise of sensitive buildings such as schools and hospitals? • Will it lead to an increase or decrease in the number of people affected by existing noise? • Will it lead to a change in standards or use that would increase or decrease the noise generated by products?

C R O S S C U T T I N G	Rural areas	<ul style="list-style-type: none"> • Will the policy have a different impact in rural areas from that elsewhere because of the particular characteristics of those areas?
	Regions and localities	<ul style="list-style-type: none"> • Will the policy have a different impact in different regions and localities because of the particular characteristics of those areas?
	Other	Will the policy or project have a significant impact that does not appear to be reflected in any of the categories above?

(2) Further Information on Distributional Impacts

	Will the policy or project impact unevenly in respect of any of the following?
Deprivation and income groups	<p>Have the interests of all income groups been taken into account during development of the policy?</p> <p>Will the policy have greater impact (negatively or positively) on any particular income group?</p> <p>How will any differential impact be addressed?</p>
Age	<p>Have the interests of all age groups been taken into account during the consultation phase?</p> <p>Will the policy directly or indirectly have greater impact on any particular age group? If so how will this be addressed?</p>
Gender	<p>Have the interests of both men and women been taken into account during consultation phase?</p> <p>Will the policy directly or indirectly have greater impact on any particular gender?</p> <p>Has the Gender Impact Assessment Tool been used?</p> <p>How will any differential impact be addressed?</p>
Disability	<p>Are you ready to provide consultation material in alternative formats (eg Braille) on demand?</p> <p>Have relevant groups, including the Disability Rights Commission, been consulted?</p> <p>Will the policy directly or indirectly have greater impact on those with disabilities? If so, can the impact be justified in policy terms or in terms of the law? If not, what can be done to mitigate any disadvantage that might arise in respect of disabled people?</p>
Race	<p>Have ethnic minority groups been involved in the consultation phase?</p> <p>Will the policy directly or indirectly have greater impact on those from particular racial groups?</p> <p>Can changes be made to ensure that the policy reflects the requirements of the Race Relations (Amendment) Act 2000, ie to promote racial equality?</p> <p>If there is a differential impact on particular ethnic groups what can be done to address this?</p>

EXTRACT FROM CONSUMER COMMITTEE MINUTES

Note: these are draft only and subject to amendment and ratification by the Consumer Committee.

List of members, secretariat and Agency staff referred to in the minute extract below

Nancy Robson (Chair) – Independent
Jeanette Longfield – Sustain nominee
Emma Copeland – Consumers Association nominee
Sue Dibb – National Consumer Council nominee
Lindsay Kearton – Welsh Consumer Council nominee
Lucy Gillie – Scottish Consumer Council nominee
Sinèad Furey – General Consumer Council for Northern Ireland nominee
Thomas Chan – Independent
Barbara Richards – FSA, secretariat

Richard Harding – FSA, paper presenter
Alison Spalding – FSA, paper presenter

Item 5 – Sustainable development considerations within the FSA (paper D031/04)

14. The Chair introduced Richard Harding and Alison Spalding, who provided an update on Agency plans to integrate sustainable development considerations into its work. Like other Government Departments the Agency was expected, though not legally required, to incorporate sustainable development considerations into its policy-making procedures. A trial was underway in several Government Departments including Defra and DH of an Integrated Policy Appraisal (IPA) Framework tool designed to help with this. An evaluation report was expected shortly and, subject to its findings and relevance for use in the Agency, roll-out was envisaged in 2005. The Committee was asked to comment upon the tool, and to highlight any areas of sustainable development which were of particular interest to consumers.
15. In terms of the timetable for implementation, Jeanette Longfield was concerned that the principles of sustainable development were so important that they should be implemented while the trial of the tool was still ongoing and should not be dependent upon the trial results since in some cases, such as fish stocks, immediate action was needed.
16. Emma Copeland queried the extent to which the Agency would take into account the 10 guiding principles on sustainable development while the tool is being trialled. Although there was currently no formal mechanism for measuring this,

Alison Spalding explained that in future Departments would be required to publicise which of its policies had been “sustainable development-proofed”.

17. Jeanette Longfield raised the importance of monitoring, review, reporting and revision clauses being written into the rollout of the sustainable development policy programme, and this found widespread agreement.
18. The Chair invited thoughts on what consumer concerns on sustainable development might be. Sue Dibb said that sustainable development issues impacted on all parts of the food production chain including transportation, energy consumption, food miles, cultivation of the land and sea, and others. She felt that the Agency should give consumers guidance on how to make good sustainable development choices.
19. Lindsay Kearton said that in Wales there were legal requirements to incorporate sustainable development into policy development. She noted the wide range of departments working on sustainable development and felt that this was unhelpful, as consumers tended to think of all the issues as linked. Any sustainable development framework should therefore work across Departments.
20. Lucy Gillie highlighted the need for the sustainable development tool to include a poverty / social exclusion element. In a written submission delivered by the Chair, Sinèad Furey also highlighted this issue, along with the need for sustainably developed products not to carry a price premium. She felt that sustainable development policies needed to be broadened.
21. Thomas Chan was concerned that in Annex C of the paper, the term “race” did not cover ethnic/faith groups and that not all disability groups were members of the Disability Rights Commission. He emphasised the importance of the screening questions in the IPA Framework tool being holistic, since many people had double, or multiple, jeopardies. Thomas Chan also requested that this issue come back before the Consumer Committee before going live, to ensure that consumer interests were accounted for.
22. Jeanette Longfield highlighted the fact that the IPA framework did not mention the impact on sustainable development outside the UK, and that the global context needed to be acknowledged. She also suggested that some aspects of the framework, such as air and water quality, should be extended to cover animals and plants as well as effects on human health to take full account of biodiversity concerns.
23. Sue Dibb highlighted the importance of sustainable development not undermining attempts to improve diet-related health. She expressed concern about the relative weights given to the screening questions and how the information would be used to develop or prioritise policy.
24. Sue Dibb asked whether the Board had considered sustainable development in general. Barbara Richards said that they intended to do so later in the year in the light of the Agency’s new Strategic Plan. There would be a public consultation on the draft plan beginning in April, the results of which would feed into Board discussions. The Consumer Committee could contribute to the consultation.
25. The Chair summarised the main points that would be of concern to consumers:

- reassurance had been sought that urgent sustainable development issues would not be shelved until completion of the tool trial – all other policies should have a sustainable development element in the meantime; and
- sustainable development should not carry a price premium for consumers.

The Chair summarised the main points that had been raised in connection with the IPA Framework tool:

- there needed to be a recognition that sustainable development was a global, not merely UK, issue;
- bio-diversity issues needed to be addressed;
- the need for monitoring, evaluation and review was imperative;
- screening questions should be appropriately weighted;
- consultation with consumers was important;
- a holistic approach was needed, and
- a greater emphasis should be placed on promoting health and nutrition.