



# FPC Response to the Soil Association Air Freight Consultation: recommendations for standards

May 2008

The Fresh Produce Consortium (FPC) is the trade association for the fresh produce industry in the UK. We represent importers, food service companies, wholesalers, packers and processors, retailers, exporting third countries and many more organisations that have an involvement with the industry. We welcome the opportunity to contribute to this important debate regarding food imports which is a key issue for the industry.

The FPC views with concern any developments which could damage the trade in fresh produce for, as we see it, no justifiable reason. Carbon footprints of and carbon emissions associated with the production, trade and distribution of fresh produce are issues which the industry takes extremely seriously and the FPC is actively engaging with the Carbon Trust and other bodies to look at ways in which this sector can identify sources of emissions and reduce the carbon footprint of companies and products.

The FPC's response to the first Soil Association consultation, which covers our arguments in depth, can be found at [www.freshproduce.org.uk](http://www.freshproduce.org.uk)

We reiterate our strongly-held belief that focusing solely on the method of transport of imported food as a basis for determining whether it is 'good' or 'bad' from an environmental perspective is short-sighted and misleading to consumers. Transport accounts for only one element of the carbon emissions of a particular product and therefore looking at the carbon footprint of the whole product supply chain – through the use of life cycle assessment – would be a far better way of determining its environmental impact.

As well as answering the questions posed within the consultation document we also have a number of other comments to make on the proposals in general.

## **Air freight and the UK**

The figures provided by the Soil Association as part of its justification for these proposals do not, unfortunately, stand up to examination. In particular, the Soil Association makes the (unreferenced) claim that 'air freight is the fastest growing sector of the aviation industry.' According to Civil Aviation Authority data, this is not true. Its figures indicate that all freight activity to and from UK airports peaked in 2004 at 2,370,950 tonnes and has decreased since to a level of growth which, from 2006 to 2007, was 0%. Basing proposals on such an inaccurate premise is a disappointing way to start a consultation on policy changes which are likely to have far-reaching consequences for farmers in developing countries.

### **Role of transport in food chain emissions**

The central tenet of the basis for the Soil Association's proposals is the role of transport, particularly air transport, in food chain greenhouse gas emissions. This was covered in the FPC's response to the initial Soil Association consultation but in view of its significance parts of the original FPC consultation response have been summarised below.

Air freighted imports of fruit and vegetables account for 0.2% of total UK greenhouse gas emissions and air freighted food is responsible for 11% of all UK food-chain greenhouse gases. Sixty percent of air freighted fresh produce is brought to the UK in the bellyhold of passenger aircraft and there is no evidence to suggest that fewer planes would fly if less imported fruit and vegetables were eaten. Air freighted fresh produce on dedicated cargo planes accounts for 0.12% of total UK greenhouse gas emissions.

There is growing evidence that in some circumstances importing outdoor-grown produce may produce less greenhouse gases than growing the same commodity in UK greenhouses heated by fossil fuels. On the other hand, in some cases and for social and economic reasons, buying local may be more advantageous. However, Manchester Business School, in their 2006 report to Defra, concluded that 'evidence for a lower environmental impact of local preference in food supply and consumption when all food types are taken into consideration is weak.... So, while there are no grounds from the available data to argue 'local good – global bad' as a general statement, this could be true for certain foods, as could the reverse.'

Furthermore, the idea of food miles looks simply at the distance the item of food has travelled from farm to retail outlet and there are clearly many other factors relating to fossil fuel use and emissions along the food chain which must also be taken into account.

Indeed, Defra's 2005 Food Miles report concluded that 'a single indicator based on total food kilometres is an inadequate indicator of sustainability'. The FPC believes that not only would the use of food miles-based labelling or trade restrictions lead to unconstructive discrimination, it would also lead to consumers developing a false sense of 'eco-security' in the belief that foods with low food miles are always good, and foods with high food miles are bad.

### **Evidence and impact, costs and benefits?**

While the Soil Association apparently justifies its proposals on the laudable objective of reducing emissions it gives no evidence of what will be the likely impacts of mandatory adoption of ethical standards. The claim is made, on page 7 (first paragraph) of the consultation document, that 'requiring ethical trade standards be met by all businesses air freighting organic products would guarantee the entire trade is having a positive social, economic and local environmental impact' yet no evidence is given to back up this claim.

The same can also be said for the statement (on the same page, second paragraph) 'overall we believe the market benefit will make this worthwhile.' While we accept that the principles of Fair Trade are, in general, a positive development and have produced real benefits for some, it is inappropriate to make such sweeping statements, upon which widely-impacting policy is to be made, without providing supporting evidence. The Soil Association cannot have failed to notice recent criticism of the Fair Trade scheme, nor can it have missed the anxieties expressed by the UK Department for International Development (DFID) in its response to an earlier statement by the Soil Association when these proposals were first mooted.

In the majority of cases, when Government proposes policies which will have an impact on a section of industry, the relevant department or agency provides a regulatory impact assessment outlining exactly what the costs and benefits will be. This is used to help those being consulted in coming to a supportive, or otherwise, decision. The failure of the Soil Association to provide this information – other than a couple of vague, baseless statements – means that respondents such as the Fresh Produce Consortium simply cannot make an informed decision on this important matter. Furthermore, the Soil Association must recognise its place as the market leader in the UK organic sector and therefore it is unacceptable not to provide sufficient information on which a decision can be made.

### **Fairtrade – what are the drawbacks?**

No attempt is made by the Soil Association to address the concerns raised by the Department for International Development (DFID), responsible for a vast amount of work in the developing world which is helping to alleviate poverty and stimulate sustainable development.

When the Soil Association's proposals were first publicised in October 2007, the DFID responded by saying: "We are worried about the livelihoods of the African farmers who don't meet these extra standards and we're worried about the costs of additional certification for the farmers that do meet the standards. We know from our support to the Fairtrade Foundation that certifying new products can take from six months to several years and costs between tens and hundreds of thousands of Euros". It is very disappointing that such concerns have been ignored by the Soil Association.

### **Monitoring and reducing**

In principle the Fresh Produce Consortium appreciates the need to provide information on fresh produce which is imported by air. We recognise that policy decisions cannot be made in the absence of appropriate information, however, it is again disappointing that no cost/benefit analysis or information has been provided alongside the proposals to require licensees to record information about air freighted produce. This means that it is difficult to establish the overall benefits provided by this measure which will be both bureaucratic and time consuming. It is also not clear from the consultation document what level of record-keeping is already required by licensees and whether this requirement will add to existing record-keeping procedures or will require new systems to be adopted.

With regard to reducing the level of produce that is air freighted into the UK, we believe that, due to the nature of the UK supply chain, it is unfair and disproportionate to impose this obligation on the licensees only. The Soil Association itself acknowledges that air freight is an expensive method of transport and is used only where necessary. Combined with the highly competitive and customer-focused nature of the UK retail groceries market it should be evident that for producers in developing countries to achieve this objective whilst maintaining the economic benefits brought by international trade will be impossible. The only way in which these objectives could be achieved – whilst maintaining the considerable growth that the organic sector, including imports, has enjoyed in recent years – would be to engage the entire supply chain in these discussions to avoid situations where producers reduce air freighted exports only to see their income slashed.

We believe that the suggestion that reducing air freighted imports to the UK could be brought about by the development of 'innovations that making shipping possible or developing more local and regional markets for organic products' are valid in themselves but slightly preposterous in this context and certainly outside the capabilities of the vast majority of licensees in developing countries.

We hope that the Soil Association fully recognises limitations that producers in developing regions face and does not use a lack of suitable local physical and economic infrastructure to penalise producers who are not able to convert production destined for export into that for local markets.

### **(Un)informed decisions made in haste**

Throughout the Soil Association consultation document there appears to be an emphasis on helping consumers make informed choices and the Association being seen to be 'doing something' as quickly as possible. No-one would deny that there is a real need for society – including the fresh produce industry – to look at ways of tackling climate change. It is also incumbent on us, as purveyors of food, to provide adequate information to enable consumers to make informed choices. At the moment that information is not available and there is a danger that the Soil Association's proposals, once implemented, will lead to consumers making decisions based on misleading information and misguided principles.

The Food Ethics Council's report '*Flying food: Responsible retail in the face of uncertainty*' states that: 'air freighted food makes a much smaller contribution to total UK emissions than other aspects of farming and food. Compared with the 0.3% of total UK emissions associated with food air freight, fresh fruit and vegetables in total account for 2.5%, refrigeration for 3.5 %, alcoholic drinks for 1.5%, and meat and dairy for 8%.'

Oxfam has commented: 'If UK consumers are genuinely concerned about lowering emissions to combat climate change, they should look closer to home. Food miles associated with the export of fresh fruit and vegetables from sub-Saharan Africa equate to only 0.1 per cent of the UK's entire

carbon emissions. Switching to low-energy light bulbs can reduce more emissions than rejecting fresh fruit and vegetables from Africa - and doesn't affect the 1.5 million people in Africa who depend on agricultural exports to the UK for a living'.

It looks like the Soil Association is getting ahead of itself somewhat in its efforts to achieve laudable objectives, by making policy decisions in the absence of both real data (i.e. air freight monitoring data and accurate cost/benefit analysis of Soil Association proposals) and effective tools for cutting carbon emissions. The Soil Association acknowledges that data is lacking – hence the proposal for monitoring – and it also states that ‘...air freighted fresh produce... should be related to the emissions in other parts of the supply chain and compared to the carbon footprint of [other] products...’. This seems to indicate clearly the recognition that food miles and transport method is just one carbon-emitting element of the food chain. Yet, in spite of these two policy-making drawbacks it is disappointing that the Soil Association continues in its quest to impose extra bureaucracy and cost on licensees, with little understanding of the economic impacts and with negligible environmental benefits.

### **Carbon footprinting and the Carbon Trust**

We note that the Soil Association supports the work of the Carbon Trust in its development of standards to measure greenhouse gases. The Fresh Produce Consortium is likewise involved with the Trust and other organisations to look at these matters which we see as a responsible approach to the matter of food and greenhouse gas emissions. We commend the work of the Soil Association in supporting the idea of carbon footprinting but regret that the Association will not wait until meaningful tools to calculate the true carbon footprint of food have been developed before making policy decisions of this magnitude.

### **Conclusion**

The Fresh Produce Consortium fully supports the idea of reducing greenhouse gas emissions associated with all aspects of the food chain but is disappointed that, not only does the Soil Association seem determined to focus its efforts on policies which will produce little environmental benefit while causing economic damage to poor food producers, but it also publishes proposals which are devoid of appropriate evidence on which decisions can be made.

It is deeply regrettable that the Association sees fit to implement these proposals in a way which demonstrates to consumers that it is ‘doing something,’ without any real understanding of what the impacts will be. We urge the Soil Association to undertake further research into projected likely outcomes before making decisions and commitments about the future of air freighted organic food. However, our fundamental concerns remain that these proposals, if and when implemented, will do little other than harm farmers in developing countries while producing negligible environmental benefits.

The FPC's response to the first Soil Association first air freight consultation, ‘Should the Soil Association tackle the environmental impact of air freight in its standards?’ can be found on the [FPC website](#) or may be obtained by emailing [infor@freshproduce.org.uk](mailto:infor@freshproduce.org.uk).