

GREATER **LONDON** AUTHORITY

REQUEST FOR MAYORAL DECISION – MD2387

Title: London Food Strategy

Executive Summary:

The Mayor requested that a new London Food Strategy be published in 2018. This non-statutory strategy will complement the full range of Mayoral strategies.

This MD seeks approval from the Mayor to publish the final London Food Strategy, along with its supporting documents. It also seeks approval for a Mayoral Direction to Transport for London in relation to its advertising policy.

The London Food Strategy is the Mayor's vision to make food better in London for everyone. The Mayor, supported by the London Food Board and working with public and private partners across the food and public health sectors, will work to deliver the strategy.

Decision:

The Mayor is requested, having regard to and taking account of the London Food Strategy Consultation Report (Appendix B) and the IIA and IIA Post Adoption Statement (Appendix C):

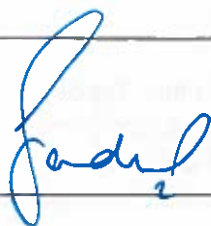
1. To approve the final recommended version of the London Food Strategy (Appendix A);
2. To approve a Mayoral Direction to Transport for London (TfL) in relation to restrictions on advertising of less healthy food on TfL's estate; and
3. To note the Implementation Plan that will be published separately from, but at the same time as, the London Food Strategy (Appendix D).

Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:

26/11/12

PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

Decision required – supporting report

1. Introduction and background

The London Food Strategy

- 1.1 The Mayor asked the previous Chair of the London Food Board and officers supporting the food programme to lead the development of a new London Food Strategy (LFS) to be published in 2018. This non-statutory strategy will complement the full range of Mayoral strategies which have been or are currently being revised by the GLA. It will replace the current version of the LFS which was published in 2006.
- 1.2 The LFS is the Mayor's vision for ensuring all Londoners have access to healthy, affordable, good food, regardless of where they live, their personal circumstances or income. The Mayor, supported by the London Food Board and working with public and private partners across the food and public health sectors, will work to deliver the LFS. It aims to help all Londoners, London boroughs and other partners to adapt the city's food system to meet the challenges which lie ahead.
- 1.3 The LFS interlinks with the other Mayoral strategies, and the positive role that food can play in everyone's lives has been integrated across the full range of Mayoral strategies. These include the draft New London Plan, the London Health Inequalities Strategy, the Mayor's Economic Development Strategy, the London Environment Strategy, the Mayor's Transport Strategy, the Mayor's Culture for All Londoners Strategy, the Mayor's Skills for Londoners Strategy, the Mayor's Vision for a Diverse and Inclusive City, a Tourism Vision for London, and a Vision for London as a 24-Hour City. Several actions in the LFS complement those in other strategies, and officers will work together across policy areas to maximise opportunities for good food.
- 1.4 The LFS is structured under six key settings:
 - Good food at home and reducing food insecurity;
 - Good food economy, shopping and eating out;
 - Good food in community settings and public institutions;
 - Good food for pregnancy and childhood;
 - Good food growing, community gardens and urban farming; and
 - Good food for the environment.
- 1.5 Each of the six chapters contains actions under the following headings:
 - What the Mayor will do to deliver change;
 - What the Mayor will do to support change; and
 - Priorities to be led by external partners.
- 1.6 The LFS has been prepared with engagement with other strategy teams within the GLA, covering all other statutory strategies including the draft New London Plan, the London Environment Strategy, the London Health Inequalities Strategy and Skills for Londoners Strategy.

Restrictions on advertising of less healthy food on TfL's estate

- 1.7 London has amongst Europe's highest rates of child obesity. To help tackle this issue the LFS contains a range of actions, including supporting boroughs to produce Good Food Retail Plans, proposals to restrict new hot food takeaways opening within 400 metres of schools, and supporting existing takeaways to improve the food they serve by making simple changes through the Healthier Catering Commitment.

- 1.8 Chapter 2 of the LFS also includes an action for the Mayor to “restrict advertising that promotes food or non-alcoholic drink which is high in saturated fat, salt and/or sugar and promote healthier options across the TfL estate”. These restrictions represent the largest intervention of its type in any city in the world and will transform the exposure that children and young people have to less healthy food advertising on their journeys to school and within their local communities. They will also reduce exposure of family members or carers responsible for purchasing food and drink on behalf of children. The GLA does not expect there to be any significant impact on overall revenue as it is expected that brands advertising products high in saturated fat, salt and/or sugar will switch to advertising healthier products in their range.
- 1.9 In order to implement this action a Mayoral Direction to TfL is required. This MD seeks approval for a Mayoral Direction.

The consultation process

- 1.10 Given the non-statutory nature of the LFS, there was no specific statutory requirement to consult on the draft LFS. However, to ensure that all Londoners, stakeholders and others had the opportunity to comment and make recommendations on the strategy the Mayor publicly consulted on the draft LFS for an eight-week period.
- 1.11 The Mayor approved the draft LFS and its publication for consultation on 2 May 2018. The draft LFS was published for consultation for an eight-week period on 10 May 2018 until 5 July 2018. An EasyRead version of the draft LFS was published alongside the main document.
- 1.12 An Integrated Impact Assessment (IIA) of the draft LFS was also published for a four-week consultation period on 21 June 2018. The IIA looks at how the Mayor’s commitments in the draft LFS could affect a range of environmental, social (including equalities impacts) and economic factors. The IIA of the draft LFS is attached at Appendix G.
- 1.13 Members of the public were encouraged to comment on the draft LFS through the Talk London webpage, which was overseen by the GLA’s Intelligence team, whilst stakeholders were encouraged to respond through the online survey on the draft LFS webpage. However, consultees could respond in whatever way they chose, including by email to a dedicated consultation email address or letter directly to the GLA’s Food Policy team.
- 1.14 A wide range of consultation approaches were used to encourage as many responses as possible. These were:

Public engagement with the draft LFS:

- Talk London survey;
- Talk London discussions;
- Correspondence; and
- Qualitative research.

Stakeholder engagement with the draft LFS:

- Digital engagement with stakeholders;
- Correspondence with stakeholders;
- Events; and
- Consultation with stakeholders on the proposed advertising ban on the TfL estate.

Consultation response analysis

- 1.15 149 stakeholder organisations submitted responses to the consultation on the draft LFS. A total of 1,519 responses to the Talk London survey were received. 516 emails from the public were received,

of which 510 were entitled: 'Destination junk free London'. These emails all had similar content and expressed support for the proposed ban on less healthy food advertising on the Transport for London network.

- 1.16 Consultants were commissioned to code and analyse all stakeholder responses, and public responses were collated and analysed by the GLA's Intelligence team. The results of these analyses were combined to inform proposed changes to the draft LFS.
- 1.17 Overall there was strong support for the draft LFS document. Stakeholders broadly agreed that the six priority areas are the right ones and that the actions will be effective. Many stakeholders did, however, want the Mayor to go further in all areas to ensure the needs of all Londoners, particularly the most vulnerable, are met. Detail of how comments from stakeholders have been taken into account can be found in the Consultation Report as at Appendix B.
- 1.18 The restrictions on advertising of less healthy food on TfL's estate received overwhelming public support, with only 20% of a YouGov¹ poll of over 1,000 Londoners against a full ban. Further public consultation took place through the 'Talk London' online platform², where 82% of over 1,500 Londoners supported the proposals. There was also strong support from stakeholders with 68% (101) in favour of a ban, 17% (26) opposed and 15% (22) not expressing a view on this element of the draft LFS.
- 1.19 The preparation of the final LFS has considered the comments received from stakeholders and the public through the consultation. This includes the addition of a range of actions throughout the document. Where appropriate amendments have also been made to ensure consistency between it and the other emerging Mayoral strategies. Officers have prepared a summary note which outlines the main changes to the LFS since the draft LFS was published. This can be found at Appendix F.
- 1.20 Officers have prepared a Consultation Report to the Mayor on the outcome of the consultation, which is at Appendix B. This contains further information about the consultation process, the issues raised by respondents, and officers' recommendations for changes to the final strategy text.

Integrated Impact Assessment (IIA)

- 1.21 An IIA of the draft LFS was commissioned from Temple Group and is attached at Appendix G.
- 1.22 Even though the LFS is not a statutory document, the GLA decided to undertake an IIA to inform its development. This is so that the overall effects of the draft LFS could be considered when developing the final document.
- 1.23 The IIA assessed the potential environmental, social (including equalities) and economic impacts of the draft LFS using a framework developed by the GLA. The IIA report was published for a four-week period alongside the draft LFS and comments were invited from stakeholders.
- 1.24 An IIA Post Adoption Statement has been produced and is at Appendix C. This statement details how the recommendations for the IIA of the draft LFS have been considered in the final LFS.

Links to other decisions

- 1.25 Decisions relevant to this MD are:
 - MD2278 – Publication of the Draft London Food Strategy for Consultation;
 - ADD2221 – Coding Support for the London Food Strategy consultation;
 - ADD2251 – Additional Coding Support for the Draft London Food Strategy;

¹ Representative sample of over 1,000 Londoners

² Non-representative, self-selecting sample of over 1,500 Londoners.

- DAR – Approval for External Support to Carry Out an IIA of the Draft London Food Strategy;
- DAR – Approval to Run Focus Groups as part of the draft London Food Strategy Consultation;
- DAR – Approval for Printing the Draft London Food Strategy; and
- MD2309 – GLA Food Programme 2018/19 (which approves printing costs for the final LFS).

2. Objectives and expected outcomes

- 2.1 Once published, the LFS will replace the existing LFS, published in 2006. The vision for the LFS is for every Londoner to have access to healthy, affordable good food – regardless of where they live, their personal circumstances or income. The six overarching aims are to:
- Help to ensure all Londoners can eat well at home and tackle rising levels of household food insecurity;
 - Support good food businesses to improve London's food environment and make healthy, affordable options more widely available to Londoners;
 - Work with public sector partners to improve their food procurement for the communities they serve;
 - Use good food to help give Londoners the best possible start to life;
 - Promote the multiple benefits of food growing for individuals and communities; and
 - Reduce the environmental impact of our food system by making it more efficient, more sustainable and less wasteful.
- 2.2 An Implementation Plan (as at Appendix D) will be published alongside the LFS. This plan details the actions that the Mayor will take between 2018 and 2023 to help implement the priorities set out in the LFS. It also provides delivery timescales and information on how progress will be measured and reported on.

3. Equality comments

- 3.1 Under section 149 of the Equality Act 2010 ('the Equality Act'), as a public authority, the Mayor must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good relations between people who share a relevant protected characteristic and those who do not. Relevant protected characteristics under the Equality Act are age, disability, gender re-assignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. This may involve, in particular, removing or minimising any disadvantage suffered by those who share a relevant protected characteristic, taking steps to meet the needs of such people, and encouraging them to participate in public life, or in any other activity where their participation is disproportionately low, including tackling prejudice and promoting understanding. In certain circumstances compliance with the Equality Act may involve treating people with a protected characteristic more favourably than those without the characteristic.
- 3.2 The consultation materials for the draft LFS were made available in a format that was accessible to blind and visually impaired people who use screen readers, and the executive summary was available in an EasyRead format for people with learning disabilities. Deaf and hearing-impaired people were provided with a means of contacting the GLA if they required further information or were not able to access the internet or email. During the consultation on the draft LFS the GLA was contacted and an audio version of the draft LFS was requested. This was produced and sent to the person who requested it. Requests for the documents to be made available in other formats and translated into other languages would have been considered on a case by case basis, although no such requests were made.

- 3.3 The IIA of the draft LFS included an assessment of the likely impacts of the draft LFS on various equality groups. This assessment concluded that the draft LFS would have neutral, minor positive, or major positive, impacts.

4. Other considerations

a) Key risks and issues

Risk	Impact/probability	Mitigation
Possible economic shocks resulting from Brexit have an impact on London's food system and consequently on the delivery of elements of the London Food Strategy.	High	The GLA is undertaking a range of workstreams to ensure London's wider economy is able to respond to the implications of a final decision on Brexit. This includes the impacts of Brexit on London's food system.
The proposed advertising restrictions are an unprecedented policy initiative that has inherent risks associated with ensuring the successful implementation of the policy.	Medium	Further engagement with industry and other stakeholders will take place over the coming months to ensure the proposals are successfully implemented and that brands move their advertising spend to more healthy products. Evaluation will also take place to monitor the impact of the intervention.

b) Links to Mayoral strategies and priorities

- 4.1 The LFS interlinks with the other Mayoral Strategies including the draft New London Plan, the London Health Inequalities Strategy, the Mayor's Economic Development Strategy, the London Environment Strategy, the Mayor's Transport Strategy, Culture for All Londoners Strategy, the Mayor's Skills for Londoners Strategy, the Mayor's Vision for a Diverse and Inclusive City, a Tourism Vision for London, and a Vision for London as a 24-Hour City. These strategies have been referenced throughout the document and prior work has been undertaken to ensure wording in all relevant strategies is aligned.

5. Financial comments

- 5.1 This decision seeks Mayoral approval of the final recommended version of the London Food Strategy (LFS) and the LFS Implementation Plan that covers 2018-2023.
- 5.2 In addition, this decision also seeks a Mayoral Direction to Transport for London (TfL) in relation to restrictions on advertising of less healthy food on TfL's estate.
- 5.3 There are no direct financial implications arising from this decision.

6. Legal comments

- 6.1 The decisions requested of the Mayor in this decision concern the exercise of the GLA's general powers under the Greater London Authority Act 1999 (GLA Act), to do such things considered to further, or which are facilitative of, or conducive or incidental to, the promotion of economic development and wealth creation, social development or the promotion of the improvement of the environment in Greater London.

- 6.2 In determining whether, or how, to exercise his general power in section 30(1) to make this decision, the Mayor is required to have regard to the effect of making it on: the health of persons in Greater London; health inequalities between persons living in Greater London; the achievement of sustainable development in the UK; and climate change and the consequences of it. The Mayor is required to exercise his general powers in a way which he considers is best calculated to promote or contribute to those objectives and will best further the promotion of the Mayor's other statutory purposes.
- 6.3 The power to make this decision is exercisable only after consultation with such bodies or persons as the Mayor may consider appropriate and in taking the decisions requested, the Mayor must have regard to and take account of the London Food Strategy Consultation Report and the Integrated Impact Assessment and IIA Post Adoption Statement.
- 6.4 The Mayor must also have due regard to the Public Sector Equality Duty, namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010, to advance equality of opportunity between persons who share a relevant protected characteristic (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation) and those who do not share it, and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it (section 149 of the Equality Act 2010). To this end, the Mayor should have particular regard to section 3 (above) of this report and to the equalities implications set out in the IIA and post adoption statement.
- 6.5 Under section 155 of the GLA Act, the Mayor has power to issue Transport for London (TfL) with guidance, general directions, and specific directions, about the exercise of TfL's functions. This includes the manner in which TfL uses its advertising estate.

7. Planned delivery approach and next steps

Activity	Timeline
Final London Food Strategy, Mayoral Direction and accompanying appendices considered by CIB	19 November 2018
Completion of printing and EasyRead version of the strategy	28 November 2018
Publication of London Food Strategy	3 December 2018
Implementation of restrictions on advertising of less healthy food on TfL's estate	TBC

Appendices and supporting papers:

The following documents are attached to this form:

- Appendix A: Recommended final London Food Strategy
- Appendix B: The GLA's Report to the Mayor on the Consultation on the draft London Food Strategy
- Appendix C: Integrated Impact Assessment Post Adoption Statement
- Appendix D: London Food Strategy Implementation Plan
- Appendix E: Mayoral Direction to Transport for London in relation to restrictions on advertising of less healthy food on TfL's estate
- Appendix F: Summary note outlining main changes to the London Food Strategy since publication of the draft London Food Strategy.
- Appendix G: Integrated Impact Assessment of Draft London Food Strategy

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 - Deferral

Is the publication of Part 1 of this approval to be deferred? YES

If YES, for what reason: The decision and appendices need to be deferred until the publication of the strategy.

Until what date: The Mayoral Direction, the London Food Strategy and other supporting documents should be deferred until publication on or around 23 November 2018.

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer:

Lisa Bennett has drafted this report in accordance with GLA procedures and confirms the following: ✓

Sponsoring Director:

Lucy Owen has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities. ✓

Mayoral Adviser:

Nick Bowes has been consulted about the proposal and agrees the recommendations. ✓

Advice:

The Finance and Legal teams have commented on this proposal. ✓

Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 19 November 2018.

EXECUTIVE DIRECTOR, RESOURCES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature

M. J. Allen

Date

20.11.18

CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor

Signature

D. Bellamy

Date

22/11/2018.