**Exploring the way forward on Core Environmental Standards**

**Commissioned by:** WWF UK, Living Planet Centre, Brewery Road, Woking, GU21 4LL

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**Output:** Research to inform policy development and facilitate stakeholder engagement on core standards

**Research Need**

The UK, like many countries, is setting out new policies to raise the environmental standards of food and farming in response to the climate and nature crisis. These are global issues which need global solutions, especially as food can be traded between countries which have different regulations and different policy frameworks. This research is commissioned to explore potential priority areas for core environmental standards for the UK, and, for some selected examples, to assess the options and pros and cons of various ways of designing them. The core environmental standards are intended to i) reflect the issues the UK’s environmental farming policies are seeking to address at home and which could be undermined without coherent and aligned trade policy, and ii) address the UK wider consumption footprint and how demand for imported foods can contribute to the transition to sustainable agriculture overseas.

**Background**

In response to widespread concerns from UK farmers, environmentalists, and the public about the direction of the UK trade policy on food, the government has reiterated its manifesto promise that trade deals will not compromise on the UK's high environmental protection, animal welfare and food standards. The government has promised to maintain food standards i.e. it’s Sanitary and Phytosanitary (SPS) rules, and it holds imports to many of these standards via retained legislation that prohibits the sale in the UK of items such as hormone-treated beef, chlorinated chicken, and fruits and vegetables that have high levels of pesticide residues. However, government has not proposed any mechanisms to avoid compromising the UK’s environmental or animal welfare standards. And currently the UK’s environmental and animal welfare rules only apply to food produced in the UK, and there are no environmental or animal welfare standards for food that is imported.

The use of trade mechanisms to address differences between countries environmental policy on food production is becoming an increasingly important policy question. With food being produced and traded around the world, policies need to address globalised supply chains in order for production to truly become more sustainable. If ambition is raised domestically, without policies that also act on food that is imported, the risk is that domestic policy is not effective in lowering the environmental impact of food, but simply moves it elsewhere, offshoring the environmental footprint.

For the UK these issues are magnified by Brexit. A host of new trade deals will potentially increase the amount of food the UK buys from outside the EU (which largely has the same farming rules as the UK). The UK has taken advantage of leaving the CAP to put in place leading environmental policy to support sustainable land management, meaning the development of trade mechanisms is even more pressing.

In the UK, core standards, in various forms, have been proposed by the Trade and Agriculture Commission and the National Food Strategy, and some kind of product rules for food have also suggested by the Committee on Climate Change. Client Earth and WWF supported initial scoping work by IEEP which suggested how core standards could be prioritised and applied. Further work is now envisaged to apply that framework and explore which environmental core standards are needed and how they could be applied in practice[[1]](#footnote-2). **We do not expect this research to provide all the evidence necessary for the establishment and design of core environmental standards, it will be for government to go through that process. In this study we want to explore the issues, and examples of detailed mechanisms in a couple of key areas in order to provide robust evidence for how core environmental standards could work in practice.**, This will enable us to develop our proposals for core environmental standards as part of a just transition to sustainable agriculture for food and farming businesses, particularly small businesses and those in the global south.

It is worth noting, that whilst carbon border adjustment mechanisms (CBAMs) are being suggested as a trade solution for some sectors, WWFs assessment is they are too blunt an instrument to drive the global transition to regenerative or agroecological farming we need. We are particularly concerned that CBAMs for food could, by themselves, lead to perverse outcomes because low welfare, fast grown, industrial production, of meat can look broadly comparable to, or sometimes even better than, higher standard farming systems in ghg intensity per kilogram of meat produced. However, wider analysis shows industrial scale conventional livestock systems are much worse when you include other environmental measures of water pollution, water stress and biodiversity.

WWF are advocating a range of core standards, reflecting the UK policy on farming in respect of environment, animal welfare and public health, and we are focusing our efforts on developing proposals for environmental standards that could set minimum requirements for things like climate, habitat, biodiversity and water quality and use.

WWF see the development of core standards for the environment in the UK being an important part of our allied objective to develop mandatory international food standards that set minimum thresholds for environmental performance for all food traded internationally[[2]](#footnote-3).

**Objectives**

The objectives of this work are threefold,

1. To progress understanding of where core standards are needed for the UK i.e. where the UK’s environmental standards and policy framework for farming are sufficiently different to countries with which we are likely to increase trade, that trade risks undermining the UK domestic transition to sustainable agriculture and/or increase the UK food footprint.

(Suggestion resource allocation: 30%)

1. In 2-3 key areas, i.e. nitrates, habitat, water use, soil quality (to be agreed in the course of the research) to identify where there is a UK regulatory baseline, and/or widely adopted voluntary practice that could become law, that could be the basis for an import standard. And explore and propose the options for designing that core standard with consideration to effectiveness, ease of administering and verifying, benefits to farm businesses and livelihoods in global south. Options for design would include factors such as,
	1. application to particular commodities or a farming system as a whole
	2. whether to focus on inputs, outcomes or processes and management practices
	3. compliance at a farm, landscape or local or state authority level

d. ability to harmonise with existing corporate or voluntary standards or certification bodies

(Suggested resource allocation: 60%)

1. To, in the course of the research and as a result of it, work with WWF and the advisory board to promote a wider debate amongst food, farming and development stakeholders about the role of core standards in the transition to sustainable agriculture. We are particularly keen to, whilst progressing discussion on where core standards can be applied now, look forward to how environment standards for food can be increased in the future. In the UK, how that would affect and be affected by differences in devolved regulations on farming and by the UK’s trade policy and deals with main sources of UK food imports.

(Suggested resource allocation: 10%)

The questions we want to advance in the course of this research are set out below. We are keen for bids to set out a clear process for an initial scoping phase and engagement with WWF and stakeholders in order to evaluate which topics are the most significant, salient and a, perhaps a relatively simple place to start to advance the development of core standards.

1. **(Objective 1) Where are core environmental standards most needed?** *Assuming that the UK does nothing about core environmental standards and continues to offer zero tariff zero quota access to its markets for agricultural produce from across the world, what agricultural imports would most increase the UK environment footprint? In other words – where would the UK be most vulnerable to offshoring its environmental impact and to increasing its food footprint?*
	1. This would require analysis of global commodity trade, UK prices, and environmental impacts - there may be ways in which the Global Footprint report and WWF work with HESTIA can be useful here, as a guideline to some of the commodities and countries that are most concerning
	2. It is not expected this study looks at all food commodities in all trade partners. To limit the scope, we invite proposals to set out how, for the purposes of this study, they will focus on, say certain commodities or countries with which the UK is negotiating or about to negotiate new trade deals? i.e. Canada, Australia, NZ, US, India, Mercosur?
2. **(Objective 2) What existing UK regulations could be applied to imports?**
3. *Which existing UK regulations on agricultural products could be applied in the form of import restrictions to prevent the offshoring of environmental impact i.e.*
	* 1. *Water quality standards, such as Reduction and Prevention of Agricultural Diffuse Pollution (England) Regulations 2018.*
		2. *Nitrate standards (taking into account the difference in nitrate laws in Wales)*
		3. *Habitat protection standards*
		4. *Forest regulations*
		5. *Pesticides prohibited in UK*
4. *And what voluntary standards which apply to most UK producers and many international ones, as they are widely used by UK supermarkets, like Red Tractor or international standards like LEAF or Global GAP, could usefully be codified into UK law that then applies to both domestic production and as an import standards to increase the scope of application?*
5. **(Objective 2) Who would be impacted by the introduction of core environmental standards in the 2-3 examples we are focusing on?** A significant proportion of UK food imports come from countries in the EU which operates to the same environmental regulatory baseline for farming as the UK, or as part of supply chains which use some voluntary environmental standards already. To what extent, for the foods and or countries we are looking at, there are already some environmental standards applied to food imported? Can we identify the parts of the supply chain and the potential importers who would be most affected by the introduction of new mandatory environmental standards?
6. **(Objective 2) How could the core standards - based on existing UK regulations or voluntary standards identified via question 2 - be designed, and what would the pros and cons of different designs of core standards be?** How would different possible designs influence effectiveness, cost of administration, fit with other standards or metrics initiatives, and support or hinder wider social and economic transition to sustainable agriculture amongst farmers, particularly small holders in the UK and the global south?

Questions 2-4 would be explored based on 2-3 selected key areas of regulation and would aim to provide practical case studies of how core standards could work, based on existing UK regulation and standards.

**Key links**

* Client Earth and WWF supported IEEP brief on core standards – [blog](https://greenallianceblog.org.uk/2020/12/11/we-need-a-trade-policy-that-aligns-food-imports-with-environmental-goals/) and [brief](https://ieep.eu/publications/environmental-standards-for-uk-agriculture-in-a-new-trade-policy-framework)
* WWF article on need for core standards ahead of the Australia deal – [article](https://www.linkedin.com/pulse/can-environment-emerge-winner-from-uk-australia-trade-angela-francis/?trackingId=vXzHYblV8TEnEUQXwClxoA%3D%3D)
* [Blog](https://greenallianceblog.org.uk/2021/03/08/us-import-protections-show-how-the-uk-can-set-high-food-trade-standards-via-the-wto/) and [briefing](https://www.wwf.org.uk/sites/default/files/2021-03/MMPA%20Briefing%20final%20draft_0.pdf) on how the US MMPA provides an example of a possible mechanism for core standards

**Outputs**

Bids that set out novel and efficient ways to deliver against the brief are welcome but are suggested outputs are,

1. Minimum x 1 stakeholder workshop/event to gather inputs and promote discussion and debate of the environmental issues around trade in food
2. Interim – think-piece, analysis or report – by mid-end November to inform and influence the development of the National Food Strategy White paper in relation to core standards
3. Final report – including a 15-page policy makers summary and proposals for further analysis
4. Launch event – for dissemination of the results and to engage key stakeholders in the debate about next steps

**Budget, funding and payment terms**

The available budget for this work is £55,000 (inc VAT) but we are interested in seeing proposals that set out the scope of work within the budget, with additional elements or add-ons along with a rationale for their added value.

WWF offices at Woking and Somerset House, where they are available, can be provided for any project workshops or meetings to be held face to face, covid restrictions allowing. Responsibility for organising workshops in the course of delivery is with the consultants. The budget for the final launch event will be additional to this contract and will agreed separately with WWF.

**Project timeline and application requirements**

Date for project to start: asap inSeptember 2021

Date for project to end: February 2022

The budget should allow for:

* 10-15 interviews with senior WWF UK and network experts in additional to external stakeholders consulted
* 4 x meetings with a cross organisational advisory group for the research made up of trade, food, and farming experts
* Monthly meetings with the WWF working group on the project
* Fortnightly update and check in calls with WWF project manager

Proposals should include:

* Approach for completion of the project
* Relevant experience (and case studies of similar previous work if applicable)
* CVs of consultants who will participate in the project
* A precise budget broken down by key tasks, including consultant daily rates
* The estimated number of person-days required
* A timeline for delivery
* Completed Sustainable Procurement Questionnaire
* Acceptance of WWF-UK’s Terms and Conditions, or markup thereof

The application should be no longer than 8 sides, plus CVs of participating consultants attached in an appendix.

Proposals will be assessed according to the following criteria:

* Understanding and insights on the brief and value added
* Project team expertise of food and farming standards and metrics, including voluntary, both national and international
* Project team knowledge of trade rules, particularly in relation to food and environment
* Robustness of proposed approach to analysis and research
* Integration of stakeholder engagement and approach to supporting impact

Given the range of expertise required proposals from joint team or consortiums are welcome.

**Please email proposals to Angela Francis (****afrancis@wwf.org.uk****), with Anna Sands (****asands@wwf.org.uk****), Claire Young (****cyoung@wwf.org.uk****), Tim Lowe (****tlowe@wwf.org.uk****) and Sara Muller (****smuller@wwf.org.uk****) in cc, before 12 noon on 06/09/2021.**

**Interviews, if required, will be held on 8th or 9th September. Please include details of when your team would be available to interview in your proposal.**

**WWF will aim to contact the successful bidder on 10/09/2021.**

1. We are aware of similar useful work being undertaken by NFU and RSPCA to develop proposals for core standards on animal welfare. [↑](#footnote-ref-2)
2. For more on WWF’s view on the relationship between national and international environmental standards see our briefing [here](https://www.wwf.org.uk/sites/default/files/2021-03/WWF%20Parliamentary%20Briefing_twin%20track%20approach.pdf) [↑](#footnote-ref-3)