

2. POLICY CONTEXT

"[There is a] lack of vision from the people setting policy. Whether that's government policy, whether that's commercial policy. For me you've got the supermarkets who say all the right things, but then you talk to the buyers and they're still XXXXing you down for the last penny on price for a 12-month contract. You talk to the government as it ratchets up its environmental ambitions and yet at the coal face, where they actually need to implement that, we are clearly being defunded. And we're getting further away from being able to deliver on that, offshoring stuff abroad and just kind of offshoring your environmental and carbon footprint now seems to be the preferred method. So, you know, it's that lack of vision. It's that lack of ambition. It's the lack of a willingness...." Joe Stanley

Policy is the intended set of principles and actions that are developed by either a single stakeholder or co-created by multiple interested parties. These policy principles and actions can then inform both strategic and tactical actions to deliver those intended outcomes. Policy outcomes could address issues such as the nation's health, defence, the economy or the environment and may be initiated and revised by a government responding to public interest, public concern or an ideological perspective that an intervention or action is the best approach to a given issue. Policy is intended to guide governments, organisations, communities and individuals to make decisions and enact behaviours to deliver certain outcomes and ultimately impact. Policy is informed by politics and informs politics, but the two are different.

Policy can be developed by the government of one country, or governments from a range of countries e.g. the G7/G8 and/or communities and/or non-governmental organisations (NGOs). Thus, good policy design, development and deployment should address the following questions:

- **The Why:** Why do it? Is there a strategic or tactical need for this policy?
- **The What:** What is this policy seeking to define and deliver? Is there a strategic intention for this policy?
- **The How:** How do we deliver this policy, what are the mechanics of delivery and the resources required? Is the policy functionally appropriate, focused and specific?
- **The Who:** Who has a role in this policy design, deployment and delivery? Who monitors how effectively this policy has been implemented? Is this policy functionally deployable?
- **The When:** What timescale is this policy to be enacted over? When should we see the intended policy outcomes being achieved? Is this policy functionally deliverable in an effective and realistic timeframe?
- **The Which:** What are the best options here? What are the trade-offs? Which interests does this policy primarily serve? Is this policy strategically agile if situations change to prevent disconnection and drift?
- **The What if:** What if the initial actions do not work? What is Plan B, Plan C? What if there are unintended consequences? Is this policy functionally agile and robust if situations change?

Reflecting on the principles of good policy design, development and deployment much of UK agri-food policy making is sub-optimal. Whilst this report will refrain from defining UK agri-food policy as broken, it is evident that

there are conflicts, siloed thinking and socio-economic fissures which need addressing. One respondent summed this up stating:

"So, it's not that people don't know how to work in systems. It's often government and policy silos that keep driving people into kind of narrow, vertically integrated thinking instead of building on how we navigate systems in our everyday lives. And I think we probably need to challenge that and give government a bit of confidence, because it works. But if you're in Whitehall and you're operating in separate teams and departments, your focus is on what you have got to do for your policy topic." Sue Pritchard, Chief Executive, Food Farming and Countryside Commission.

So how can we begin to identify what, where, why and how agri-food policy is sub-optimal, so it can be addressed?

A tick-box approach to design, development and deployment of policy will lead to policy that is transactional, focused on rules, process and compliance rather than on outcomes and impact. Tick-box approaches lack the substance and detail to address deep rooted problems and the barriers and constraints to policy implementation (Figure 4). The examples in Figure 4 are based on 'the why, the what, the when and the how' that policy approaches can be better aligned in order to provide measurable time-bound outputs where progress can be monitored and evidenced.

Tick box approach to design, development and deployment of policy:	Leads to:
Focus on meeting formal tasks or delivering on a to-do-list.	Transactional policy that focuses on rules, process and compliance rather than delivering on meaningful outcomes and impact.
Looking good on paper but lacking the depth or insight needed.	Giving the appearance of supporting effective decision-making and action but lacks the substance and detail to address the root causes of the problem or the complexity of the need.
False confidence in the efficacy of the rules, process and compliance aspects of the policy.	Undermines the level of trust in institutions and policymakers.
Examples of a tick-box approach statement and how it can be reframed "Conduct a public consultation with citizens" to "Ensure that at least 60% of the government report's recommendations come from the three-month public consultation phase of the work." Develop a farming futures roadmap" to "Deliver a farming futures roadmap that will facilitate 70% of farming businesses transitioning to climate smart farming practices by 2040."	

Figure 4. Tick box policy approaches lead to...

In the examples of a 'tick-box approach policy statement' the first phrase is tick box policy, the second rephrasing provides a policy statement that is specific, measurable and time-bound. We need to transition, where it occurs, from tick-box, transactional agri-food policy to transformational policy. The second aspect that leads to sub-optimal policy is the 'goldilock's principle.' The 'goldilock's principle' is not a new concept and has been applied in many contexts and scientific disciplines when considering the 'just-right' perspective i.e. that policy should be balanced, appropriate and the best fit given all factors that need to be addressed and all the stakeholders' views that need to be considered. The discussions that underpin this report raised a slightly different perspective around the 'just-right' perspective that is presented here.

The design, implementation and calculation of impact of agri-food policy is generally determined through two spectrums either the 'Good-better-best' or 'Worse-worser-worst' scenarios. In the food retail environment, the same principle holds in how food and drink products are described to consumers (basic/essential then standard then good-finest) where the different specifications are not only linked to the composition of the product, but also the environmental and social impact of the method of production. The good-better-best scenario is applied in many agricultural contexts, for example,

- In differentiating farm assurance, animal welfare or environmental standards;
- To develop progressive policy options where the level of conformance, ambition or outcome increases across a spectrum for example, the historic development of the government environmental entry level scheme (ELS) and higher-level scheme (HLS); and
- To provide evidence of the stages of development or maturity of policy implementation e.g. the expanded offer for the Sustainable Farming Initiative (SFI) in 2024³⁷.

The language represents different contexts, suggests optionality depending on market demands and can support the development of benchmarking, framework building and policy priorities (Table 3).

Level	Description	Policy implications
Good (Worst)	A minimum standard often based on legal compliance which is acceptable to the market and society.	Baseline standard that shows a status level or delivery of the first step on a process of transition e.g. to improved animal welfare or environmental standards.
Better (Worser)	Raised standards that reflect the addressing of certain policy issues or customer/consumer requirements.	Next stage of standards that shows a higher status in terms of level of performance or further progress towards an animal welfare or environmental goal.
Best (Worse)	Standards developed to maximise outcomes or minimises the negative impact of food and drink production that customers, consumers or citizens are willing to pay for.	The stage of standards that show the highest status, performance level or progress toward an animal welfare or environmental goal.
North Star	A visionary standard or goal that may or may not be achievable, or customers/consumers may not ultimately be willing to pay for, but that drives a trajectory of transformation.	The goal or outcome, e.g. achieving net zero emissions, that demonstrates complete transformation.

Table 3. Good-better-best scenario applied to animal welfare or environmental standards

The North Star is a policy goal or outcome that demonstrates the results of a complete transformation in the trajectory of a business, sector, indeed country, to a new status or way of thinking. The North Star approach highlights the purpose, guides the strategic direction and strategic planning, tactical actions and the development of clear targets and milestones, embedding measurable indicators to determine progress and describing what success looks like informing policy choices and any potential trade-offs. An example of a North Star policy goal is

‘for the UK to achieve net zero emissions by 2050’³⁸ or another is one of the seventeen sustainable development goals (SDGs) ‘to achieve zero hunger by 2030.’³⁹ The advantage of North Star policy goals is that they can be enshrined in law so that they are legally binding, overcoming the potential for policy change if there is a change of government, or change of Minister in a government department. They can help to align multiple stakeholders behind a common goal and as a result support consensus building on the important priorities and the agreed pathways to success. They can also prevent drift or mission creep and ensure accountability mechanisms are included in policy design, development and deployment to report on progress. But.... And there is a but.... for some individuals and businesses, the North Star approach can seem ‘pie-in-the-sky,’ irrelevant to their day-to-day activities or unachievable. As a result, individuals can become disincentivised or disengaged from efforts to achieve them, especially where short term challenges and risks take precedence in their strategic and operational activities.

When considering ‘the which’ and ‘the what if’ of policy it is important to consider how short-term government or market-driven policy interventions can move an industry towards meeting the long-term North Star goals. For example, the financial cost of decarbonisation must be met in the present by farmers, processors, retailers and consumers to deliver the future goal of ‘net zero’ emissions. There is the prediction of future benefits, even savings, but who will pay for decarbonisation and who will reap the rewards of delivering the milestones or the final outcomes is not always clear.⁴⁰ The upside and downside risk of transition is not always equally shared (see Section 6). It is important with any North Star ambition to consider what happens if Plan A doesn’t work - how can the individual, organisation, sector, country, even the world, switch to Plan B or C? What informs system robustness, national and individual business robustness? (see Sections 6 and 7). What does agile reassessment and redeployment of policy in these contexts look like? What does success look like? How can agricultural businesses grasp opportunities that arise and remain robust? The report will reflect on these questions further.

The ‘goldilocks principle’ influences governmental and non-governmental (especially market-driven) policy which is formed and amended within a process of negotiation and renegotiation. It is important in any policy implementation that the tools to implement policy, let’s call them the frameworks, do not in themselves become the only output. Developing frameworks is not the policy destination; the frameworks are only the tools or instruments to support delivery of the policy goals. Frameworks may describe the ‘what’, the ‘who’ and the ‘when,’ sometimes the ‘why’ and the trade-offs involved in the ‘which’, but the ‘how’ and the ‘what if’ are essential aspects of delivery. In many instances, the development and maintenance of the frameworks, or lack of it, allows them to drift and become functionally deficient. The development of say, the farm assurance standard, the food strategy, the farming roadmap, the sustainability framework, becomes a means to an end, the publishing of the standard, strategy, roadmap, rather than an intervention that catalyses the activities that effectively deliver the intended outcomes and impact. In these circumstances, success is then perceived as simply having delivered the framework not the much-needed transition, the sectoral change or the outcome that the framework should enable. Success is not the framework itself, nor the designing of the implementation plan nor the deployment of the assurance standard. Success is the ability to capture the opportunities that arise from the development and implementation of these frameworks and associated policy. Grasping these opportunities means the UK agri-food sector can shift from a context of survive to thrive. Nicola Shadbolt and Femi Olubode-Awosola summarise this beautifully at the farm level, but it is true at the policy level too:

“Successful farmers are those that adapt to shifts in the [operating] environment to capture the opportunities from such disturbance and outperform those who do not adapt.”⁴¹

The objective of these frameworks is to enable farmers to be adaptive, opportunity-driven and to perform when the systems they operate in (natural, socio-economic, geo-political etc.) are disturbed and may not return to 'business-as-usual.' The outcome of a 'frameworks for frameworks sake' mindset however is:

- The over-bureaucratisation of the UK agrifood sector and agricultural production in particular;
- Operationalisation of frameworks that are too compliance heavy with the focus on deploying modes of assessment rather than on improving productivity, profitability and performance within the sector; and
- Creating policy inertia where resources are prioritised for updating governmental and non-governmental policy frameworks rather than driving robust, effective, agile and dynamic operations especially during system disturbance and through longer-term correction and change.

One final aspect of sub-optimal policy is that of 'pseudo-regulation,' the adoption of frameworks and policy that mimic regulation and are voluntarily adopted to prevent regulation but can end up being more of a burden to an industry sector than if reasonable regulatory guidelines has been introduced and the governance structures that align with it. The term pseudo-regulation is not new. Pseudo-regulation involves the adoption of voluntary mechanisms, rules, standards and processes by a sector to prevent potential regulation by government bodies. Pseudo-regulation describes the government-NGO-industry strategic approach to 'voluntary' standards, where businesses themselves and consumers, pay for the cost of adoption of standards and the mechanisms for ensuring ongoing compliance. These market-orientated approaches are forms of self-regulation, often becoming a market pre-requisite to supply and promote the concept of earned recognition, a way to demonstrate that your organisation meets certain criteria without the need for formal government inspection or assessment.

Public-private partnerships (PPPs) are formal collaborations between government and private sector,⁴² for example, the sharing of compliance activities and business data between individual organisations and government. PPPs are based on contractual agreements and a clear articulation of the responsibilities, resource sharing and aspects of risk sharing between parties. These are of particular interest when considering sector level data-sharing to deliver regulatory or policy outcomes, such as net zero greenhouse gas emissions, or delivering nature-based targets. Third-party certification to standards such as GlobalGAP⁴³ or Red Tractor⁴⁴ farm assurance, create a culture of assurance and accountability, but a proliferation of initiatives can lead to duplication and increased costs borne primarily by agri-food businesses.

It is important to differentiate between the policy framework, the policy model or the policy blueprint and the policy pathway. The policy pathway is the sequence of steps, actions or the milestones that demonstrate progress towards the final policy goal (e.g., a North Star), intended outcomes or impacts. The pathway is the planned route or roadmap to move from one stage to another during policy implementation. Policy can be sub-optimal from the outset because it is functionally defective, deficient, descriptive or disconnected or simply drifts over time (Figure 5). This report reflects on four types of sub-optimal policy design and implementation described here as chocolate tea-pot policy, half-baked policy, platitudes as policy and whack-a-mole policy. These weak policy approaches, whether implemented by supranational organisations, governments or the market, may garner media noise and fanfare at their launch but fail to deliver either appropriate outcomes or meaningful change.

Chocolate tea-pot policy (functionally flawed - defective)

This type of policy is often well-intentioned, can be based on a recognised need, is officially sanctioned and outwardly appears appropriately designed and implementable. In reality, the policy is too costly, too bureaucratic, physically unworkable, often lacking any viable practical application or the necessary infrastructure for delivery and sets objectives without addressing the vested interests and barriers that will prevent the outcomes being achieved. As a result, over time the policy proves to be a functional failure. An example would be the Pick for Britain campaign⁴⁵ during the Covid-19 pandemic.

Half-baked policy (functionally incomplete - deficient)

Half-baked policy is vague, ambiguous and lacks a clearly articulated value proposition for those who are affected or required to change behaviour. Half-baked policy can look ready to go when it is launched and the press-release appears to tick all the boxes, but when it is deployed the implementation phase highlights multiple deficiencies that need to be addressed before the policy gains the intended leverage. The introduction of the Environmental Land Management Scheme (ELMS) is one such example. At its introduction the lack of value proposition for farmers, especially upland farmers,⁴⁶ meant it was slow to roll out and had to be revised and new reiterations released before it gained significant leverage with the agricultural sector.

Platitudes instead of policy (functionally disjointed - descriptive)

Policy platitudes are singular or combined statements that are about policy issues but are not policy in its substantive sense. They sound comforting, appealing and reach out to a broad community, sound supportive without concretising the how, who or when or what. They are statements that are good to hear, hard to disagree with, but lack specifics and substance which means that anyone or any organisation making those statements cannot be held to account later. Examples of policy platitudes would be statements such as “go green,” “save the planet,” or “food security is national security.” Without the associated implementation of strategic plans and policy pathways for adoption and the delivery of measurable outcomes, they are just policy platitudes.

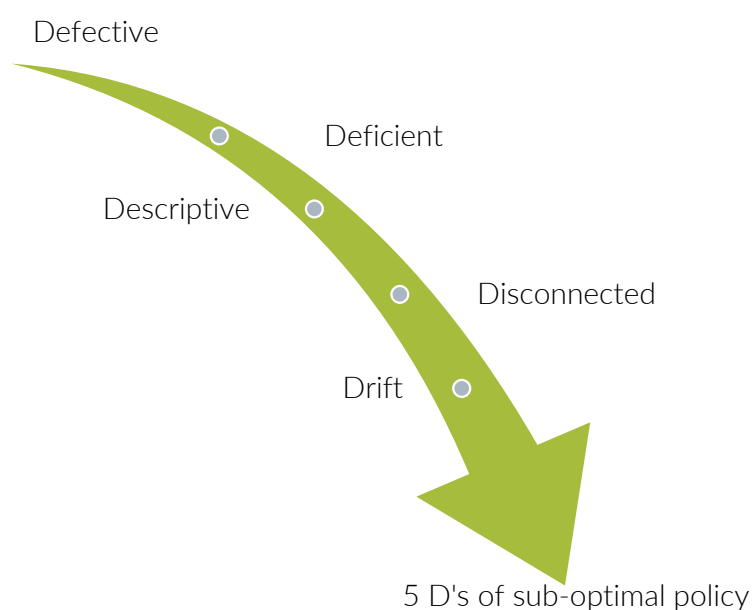


Figure 5. 5 D's of sub-optimal policy

Whack-a-mole policy (lacks connection - disconnected)

Similar to the arcade game, "whack-a-mole policy" describes a highly reactive approach to addressing a need or solving a problem. Issues are addressed individually as they arise, or if the initial policy doesn't work. New interventions are adopted, management teams are shuffled, but the actions are stand-alone, disconnected and do not address the wider issues or root causes to solve the problem or deliver the outcomes the policy is seeking to address. "Whack-a-mole" policy is inefficient, usually ineffective and experiences drift as political priorities change and can use and waste significant financial, environmental and human resources. An example would be the development of school meal nutritional standards in the UK. Devolved nations within the UK have developed their own standards over the last 20 years and standards continue to be reviewed and revisited, e.g. in 2025 in England⁴⁷ and yet there is still significant concern over national child overweight and obesity levels.⁴⁸ This means that both short- and long-term policy outcomes for childhood health and wellbeing are not achieved despite decades of policy activity.

The four sub-optimal policy approaches are compared in Figure 6 and within this the catch-all that 'time will often tell' as to whether the policy developed can support the appropriate policy pathway and deliver the intended outcomes and impact where they have been defined. If a good future for the UK agricultural sector is to be regenerative, in the widest sense of the word rather than extractive, is to be robust and resilient rather than vulnerable then we need to go beyond 'frameworks for frameworks sake' policy. We need to look at switching from a good-better-best, worse-worser-worst focus in policy to one of 'becoming.' Becoming requires a clear governmental and market vision and strategy. It requires a transparent and meaningful disclosure of the direction of travel that will engender trust. It requires an honest articulation of where the agri-food sector is and where it is expected to be. Being mission-led or 'becoming' embeds confidence in the policy, the business plan and the execution of the business plan. Becoming recognises a direction of travel for the business/industry sector and those who work in it and makes people curious when opportunities arise. Becoming informs mindsets and thinking.

	Why	What	How	Who	When	Which	What if
Chocolate tea-pot policy	✓	✓	✗	✗	✗	✗	✗
Half-baked policy	⌚	⌚	⌚	⌚	⌚	⌚	⌚
Platitudes as policy	⌚	⌚	✗	✗	✗	✗	✗
Whack-a-mole	⌚	⌚	⌚	⌚	⌚	⌚	⌚

✓ Yes ✗ No ⌚ Time will tell

Figure 6. Comparison of sub-optimal policy approaches

Policy summary

Agri-food policy is currently fragmented, often sub-optimal and often focused on developing frameworks, models and standards rather than on delivering strategic outcomes and impact. A good future for UK agriculture requires:

- A clearly articulated vision from UK government(s) and a strategic agile plan that recognises the role of the market and the state in how land is used in the UK. This vision must be aligned with a clear policy pathway, appropriate strategic outcomes and mechanisms to ensure effective delivery and impact.
- Agri-food policy in the UK needs to come out of the silos and be effective enough to address the complex, often competing, devolved, national and international challenges that influence land use and food security.
- Development of trust between the government and the UK agricultural sector is a prerequisite for confidence. Confidence facilitates investment in innovation, in people and new ways of thinking. A lack of confidence leads to inertia, stagnation and decline. Trust in the long-term vision of the UK government and the governments of the nations and market signals will encourage agricultural businesses to make investments and take risks so they can grasp the opportunities that arise.

The next section of the report reflects on the mindset and thinking required to address this need.

