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Accountability, Sustainability and Society

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**The Battle for the Consumers:  
Building Relationships in a New  
Phase of Contested Accountability in  
the UK Food Chain**



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# **The battle for the consumers: Building relationships in a new phase of contested accountability in the UK food chain**

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Andrew Flynn & Robert Lee**

## **Abstract**

This paper presents a brief history of the changing food policy governance in the UK and highlights the gradual Europeanisation and Consumerisation of UK food policies. The paper discusses the complexities of the private interest model of food regulation and the role played by retailers in the food sector in trying to influence consumers. The impact of the establishment of the Food Standards Agency on the context and implementation of food regulation in the UK also forms the theme of discussion in this communiqué. The paper identifies five significant recent developments by way of which the State, corporate and private interests, consumers and social interest groups build relationships in response to the need for accountability within the UK agri-food chain, symbolising the development of a complex public/private set of associations, that is evolving as a result of the private, institutional and consumer pressures on food regulation.

## About the BRASS Centre

In 2001, Cardiff University won £3.1 million in research funds from the Economic and Social Research Council to develop a Research Centre for Business Relationships, Accountability, Sustainability and Society (BRASS). The Centre is a joint venture between the University's Schools of Business, City & Regional Planning and Law. It brings together the three Schools' existing research expertise on issues of sustainability, business ethics, company law, corporate reporting and business communication.

The Centre started work in October 2001 under the leadership of Professor Ken Peattie of the Business School, Professor Terry Marsden of the Department of City and Regional Planning and Professor Bob Lee of the Law School. The funding of the Centre covers an initial five-year period, but this should just mark the beginning of BRASS' contribution to creating more sustainable and responsible businesses locally, nationally and globally.

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## **1.0 Introduction: researching the implications of the food safety crisis**

John Bowis, Rapporteur, European Parliament, Committee on the Environment, Public Health and Consumer Policy, on the Commission White Paper on Food Safety (2000), summarised the extent of the food safety crisis as

*“...poor practice and scandals have exercised the media, the public and their elected representatives in recent years. The list is long, ongoing and potentially endless given that absolute safety is not an attainable goal. Olive oil, contaminated wine, Perrier water, E. coli, Listeria, Salmonella, polluted drinking water, BSE, Dioxin sludge and slurry entering the human food chain, pesticides, animal feed, GMOs, all in their time and in their way have caused concern, fear, panic and public enquiry.”*

Food-borne illnesses and food contamination are not new phenomena. However, the pattern of infection over the past twenty years seems to have been altered. Within 24 hours, food produced in one region can be distributed to any part of the globe and outbreaks of infection may occur far from the source of contamination. The spread of food-borne diseases in Europe is perhaps a consequence of the Single Market's success; but as with most public policies, unintended and often negative effects can assert themselves, and engender an appeal for re-examination of costs and benefits.

Consumer confidence in food safety was seriously undermined with the Belgian dioxin scare in 1999. This probably triggered the calls from various public and private bodies for the creation of an independent supranational body to regulate food safety in the EU.

Dioxins and PCBs are among the dangerous compounds known as persistent organic pollutants. As the name suggests, their effects are particularly lethal because the chemicals are very stable and stay in the environment for a long time. Brief exposure to high levels of PCBs and dioxins may cause skin lesions and affect the liver. Over longer periods, the harm is transferred across generations.

The dioxin case is just an example of the extent of the deepening and multiplication of food safety risks in the context of an increasingly integrated European food system. It is against this background and with the recognition that compliance with European

Commission level decisions are beginning to have a strong impact on food safety policies within the UK, that the current research is being undertaken.

While, the first phase of the research, involved mapping the changing dynamics of food regulation and accountability across the agro-food chain in the EU (see Smith *et al*, 2004, in press for more details); the second phase focuses on the National level (UK). The key findings and analysis of the second phase of the research are discussed in this paper. The aims and objectives of the research are:

- To identify ways in which the state, corporate and private interests, consumers and social interest groups *build relationships* in response to the need for more accountability within the agri-food chain.
- Identify how the renewed role of the state, for instance, the establishment of the UK Food Standards Agency has impacted on the context and implementation of food regulation in the UK.

## **2.0 Methodology**

The research utilises a range of data, analytical techniques and extensive documentary research between 2002-04. The broad assessment of the secondary material enabled a clear understanding of the driving forces for change in the food safety regulatory framework in the UK, their aims and impacts, as well as the path that future development is likely to follow.

Data collection for the second phase involved identifying UK-wide, key organisations belonging to regulatory/public, private interests and consumer/social interest groups closely associated with food and consumer issues, and carrying out a series of face-to-face and telephone interviews. The interviews enabled us to understand:

- First, the interplay between the potential for regulatory capture, regulatory re-negotiation by corporate interests within the food industry, as well as different methods of agri-food regulation activities that are implemented by the state;
- second, the differing regulation and accountability strategies designed to re-engineer consumer trust in food; and

- third, the extent to which the changing nature of agri-food regulation is facilitating the emergence & consolidation of alternative food supply chains.

Interviews were conducted with 8 private interest organisations, 3 regulatory interest organisations and 9 consumer and social interest organisations (see Annex for the list of the organisations interviewed).

Against the backdrop of food safety scares and the extent of the food safety crises, this paper presents a brief history of the changing food policy governance in the UK and highlights the gradual *Europeanisation and Consumerisation* of UK food policies. Section three of the paper gives a brief overview of the changing food policy governance in the UK. Section four describes the process of *Europeanisation* in general and highlights the gradual *Europeanisation* of UK food policy. While the increasing consumerist approach and institutionalisation of food policy in the UK is discussed in section five; the complexities of the *private interest model* of food regulation and the role played by retailers in the food sector in trying to influence consumers, is discussed in section six. The impact of the establishment of the Food Standards Agency on the context and implementation of food regulation in the UK forms the theme of discussion in section seven.

The concluding section summarises these five emergent themes of the research by highlighting the *more complex model of food regulation in the UK*, that is evolving as a result of the private, institutional and consumer pressures on food regulation. The results highlight the growing significance of incorporating consumer and public concerns and constructions in policy making, along with fostering a pivotal and globally competitive European food market. The riding of these two ‘horses’-one associated with the deepening spatial mobility of food; the other associated with continuously giving this mobility some degree of public legitimacy-defines the agenda for the new complex model of food regulation. *A model which has re-cast private interest regulation within a new publicly-defined set of parameters supposedly in the (European) public interest.*

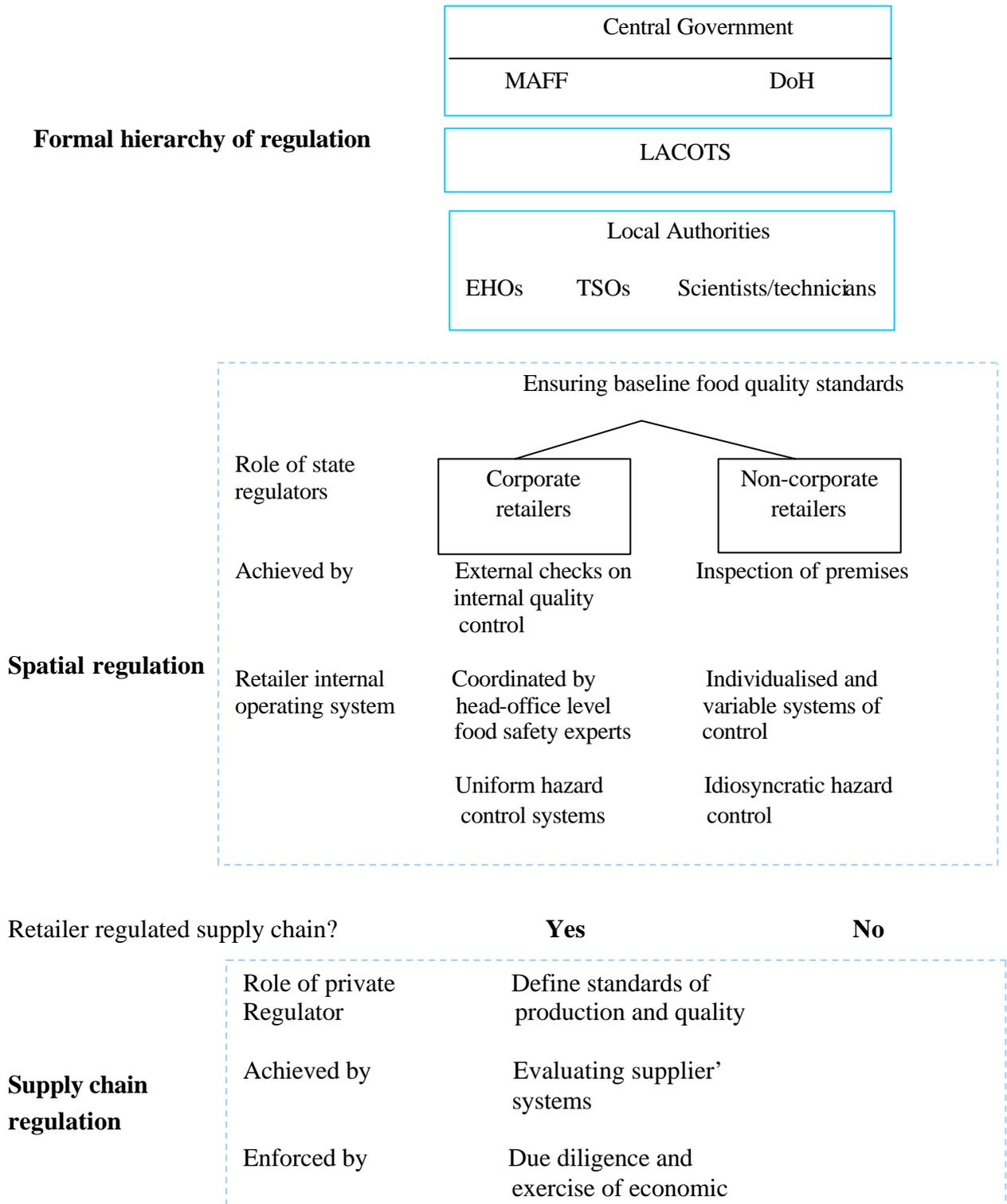
### **3.0 The changing scope of governance : post-BSE food policy in the UK**

The evolution of the UK food policy can be categorised into three phases: The *first phase* represented a period (before the mid 1980s) of a regulatory regime when food and agricultural production systems were regarded as being safe unless scientifically proven otherwise. The State had a rational and scientific basis on which to test relevant public health and food quality assurance policies. This food regulatory approach, allowed the State to play a key role in the food supply sector (Marsden *et al.* 2000), and was, for a considerable period, successful in addressing food safety and other public health concerns, relating to food.

In *Consuming Interests*, Marsden *et al.* (2000) map out the changes and adaptations, that have taken place since the mid 1980s, and in how food risk is perceived and new regulatory frameworks emerged. They point to advancement from a government-led regulatory and monitoring model to a new phase (the *second phase*) dominated by supply chain management, and food standards strategies, designed and applied increasingly by the large multiple food retailers. This *second phase* of food regulation was driven primarily by the way food safety issues are perceived by large food retailers; leaving the State to act mainly as auditors rather than enforcers of the mainstream process. Fig 1 illustrates this *second phase* private-public food regulatory regime in the UK.

Regardless of the fact that the *second phase* was offering clear improvements in food quality assurance, this approach allowed corporate retailers to distinguish themselves from their non-corporate competitors, and from each other, on the basis of the assurance of quality that they are able to deliver through rigorous supply chain management.

**Fig. 1: The private-public food regulatory regime in the UK (prior to the setting up of the Food Standards Agency in April 2000).**



MAFF- Ministry of Agriculture Food and Fisheries  
 LACOTS - Local Authorities Coordinating Body on Food and Trading Standards  
 DoH - Department of Health  
 EHOs- Environmental Health Officers  
 TSOs- Trading Standards Officers

This dual public / private model of food regulation has, more recently also experienced pressure for change as its legitimacy has also been challenged (see Smith *et al*, 2004 in press).

A *third phase* in the UK was marked by the establishment of the UK Food Standards Agency (FSA) in April 2000, with an aim to promote food safety and food standards as a non-ministerial department focussing on the protection of consumers and their interests. The James Report had revealed a public unease in relation to the corporatist style of decision-making in British food and agriculture sector. There was a public perception that the process of decision making was steeped in an ethos of secrecy (involving Ministry of Agriculture Food and Fisheries (MAFF) and powerful farming, industrial and retailer groups). This *modus operandi* was seen as both benefiting those with vested interests and functioned to the detriment of the public. As a consequence, the government agreed to remove certain key functions and responsibilities from the MAFF and Department of Health (DoH), and vest them in the more independent FSA, with the powers to set stringent food safety standards, as well as to enforce them.

The analysis presented here assesses five of the key conceptual parameters and dynamics of this *third phase* in the evolution of food safety regulation in the UK, and the powers responsible for shaping this current regulatory framework.

#### **4.0 The evolving food safety regime I: *Europeanisation* of UK food policy**

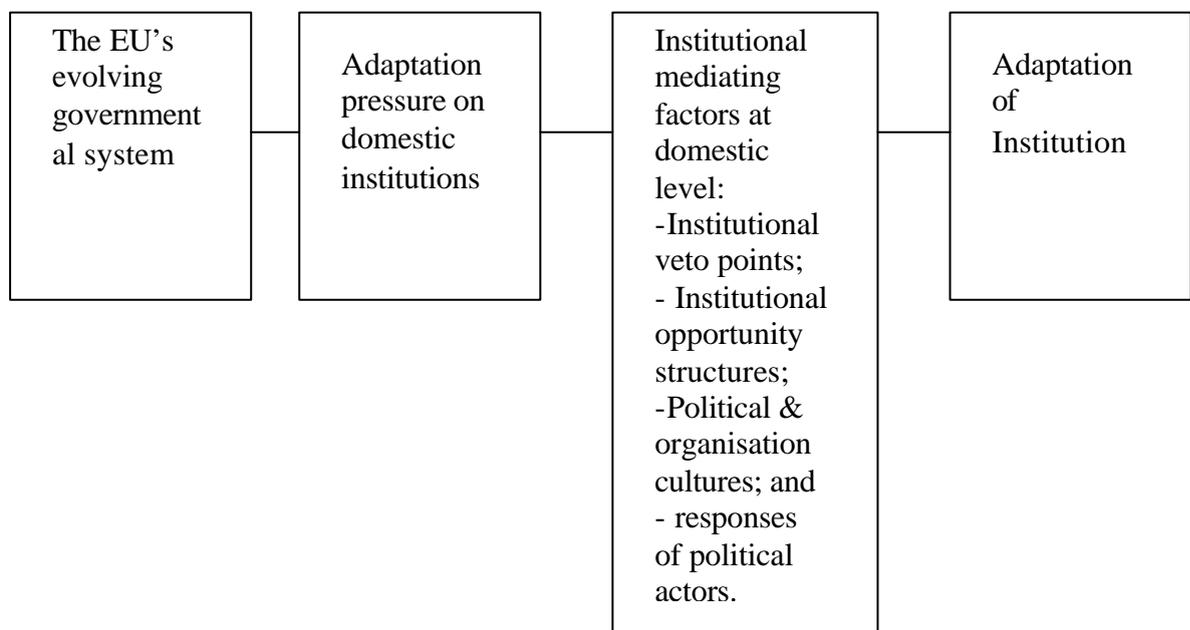
In its most explicit form, *Europeanisation* is conceptualised as the process of downloading EU Directives, regulations and institutional structures to the domestic level (Howell 2004). According to Bulmer and Radaelli (2004) *Europeanisation* consists of processes of (i) construction, (ii) diffusion and (iii) institutionalisation of formal and informal rules, procedures, policy paradigms, styles, “*ways of doing things*” and shared beliefs and norms. These are first defined and consolidated in the EU policy process, and then incorporated in the logic of domestic discourse, political structures and public policies.

The nature of *Europeanisation* involves adjustment to the EU process of aligning two institutional logics: that of the EU and that of the UK governance. This adjustment

process entails two separate steps. As a first and necessary stage, domestic institutions must find suitable ways of processing EU business. The lowest adjustment cost is incurred by incorporating EU business into the pre-existing domestic logic of governance through some switching mechanism. Bulmer and Burch (2001) refer to the two components of institutional response to *Europeanisation* as *reception* and *projection*. *Reception* being the first response to *Europeanisation*. It is a prior step to the *projection* response, where projection refers to the development of machinery for securing an effective voice in the formulation of policy in Brussels. This means, learning “the rules of the game” in Brussels and how they may be different from those in the domestic political system.

Our understanding of *Europeanisation* and domestic institutional change can be further explained by the simple model, by Risse *et al.* (2001), where they point out how the adaptation pressure derives from the EU level and prompts adjustment of domestic institutional design (Fig. 2). Domestic institutions, together with the cultures and norms within them, are important mediators of adaptation pressure.

**Fig. 2: *Europeanisation* and institutional adaptation**



*Source: Risse et al. (2001).*

The adaptation of UK governance to integration over the period up to 1997 was principally one of absorbing EU business into the practices established domestically over the last decades. Post 1997, the UK government has built on established trends in the UK/EU policy handling, but it has also set up new structures and processes (Bulmer and Burch, 2001), which potentially shift the field on which European policy is played out at the domestic level. While these changes have not yet led to significant alterations in outcomes, they have the potential to do so and they have particularly influenced food policy.

The Effects of *Europeanisation* can be measured along three distinct interrelated variables namely: *policy content*, *policy structure* and *policy style*. According to Hall (1993), policy content can be divided into three different levels. The first relates to the precise setting of policy instruments. The second is the instruments or techniques by which policy goals are attained. The third level comprises the overall goals that guide policy. The concept of policy structure is potentially very broad, raising some problems in defining its boundaries. National institutional structures range from the basic building blocks of the State through to policy coordination networks, codes, guidelines and ways of working (Peters, 1999, Bulmer and Burch, 2000).

In our research, the key players associated with the food sector in their interviews more or less addressed all these variables, with a particular focus on changes in *policy structure*.

It is recognised that the EU is increasingly the main source of food law that needs to be formulated in the UK. Directives covering food composition, food labelling, food marketing standards, additives, contaminants, nutrition, adulteration and food fraud provide a constant stream of new legislation. A clear example is the sentiment, expressed by the Department for Environment, Food and Rural Affairs (DEFRA) and the FSA, that the UK government did all that was possible to consult with key UK stakeholders on the implementation of UK food law, but that the decisions on standards were often made at EU, rather than national, level. This thinking was reflected in our interviews with retailers:

*“...the vast majority of legislation now is definitely European.”*

Similar views about decisions on standards being often made at EU, rather than national, level were also expressed by consumer interest groups, they argued:

*“...legislation on all aspects of farm animal welfare has been European based. It has come from a directive that’s been agreed on a European level and has been taken by the UK and implemented directly into UK law with very few changes, very few additions. And now we have the situation where we know that any directive will be almost verbatim translated into UK legislation and that nothing else will be brought in and changed.”*

In earlier work, Marsden *et al.* (2000) showed, how corporate retailer-led supply regulation became empowered, through, the pattern and performance of European food hygiene Directives, and the use of quality control and risk management techniques, such as Hazard and Critical Control Point (HACCP).

In continuing to pursue the EU’s objective of participative governance (see Article 1, Treaty on European Union), the European Commission has been engaged in the creation of new institutions as a means of securing different interests into the ongoing process of *Europeanisation* (Richardson 2000). In particular, it

*“has been a strategic actor in constructing assemblage of stakeholders concerned with each of the Commission’s policy sectors”* (Mazey and Richardson 2001).

As a result of which, various influential consumer and farming lobby groups in Brussels, for example, the European Consumers’ Organisation (BEUC), Euro coop, Committee of Agricultural Organisations in the European Union (COPA), General Confederation of Agricultural Co-operatives in the European Union (COGECA), Association des Consommateurs Europeens (AEC), and the European Association for the Coordination of Consumer Representation (ANEC), receive financial support from the Commission. (Smith *et al.*, 2004 in press).

The following excerpt from our interviews illustrate the key trends in this process that seeks to deepen the *Europeanisation* of food policy; For instance, according to COPA:

*“...the organisation, which was founded more than 40 years ago, is a kind of partner for the Commission. It was a farmers’ body, working in their interests, and ... every time there are new members in the European Union, there are new members in COPA.”*

This was also reflected in our interviews with the private interest groups in the UK, who stated:

*“.....now Brussels is our principal focus of attention as far as new legislation is concerned. To the extent that we now have a team of two people who are based full-time in Brussels, monitoring for us the legislation. In terms of legislation we spend a lot more time consulting with various people and trying to influence legislation as best as we can.” (Retailer)*

While some groups had no qualms about the legislation coming from the EU they highlighted the fact that they are happy that there is more focus on consumers; some groups exhibited concerns about the law making and emphasised the fact that it should be done in a more effective way.

*“... It (Directorate General for Health and Consumer Affairs (DG SANCO)) has made a difference, going back to when DG SANCO was strengthened, there is definitely more of a consumer focus, and they were given much more responsibility for legislation. So we have seen a change in a lot of areas in the whole emphasis of the food legislation.....And because the food dossier is largely co-decision based, that means there’s a lot more scrutiny from the European Parliament for instance, in terms of what legislation they’re putting forward”. (Consumers Group)*

The general pattern so far has been one of a gradually increasing set of rules on how to conduct European business. Thus there has been a proliferation of ‘guidance’, whether through the use of precedents or of codified rules. From the preceding extracts we can identify some of the key facets, and more specifically dynamics, of the gradual *Europeanisation* of UK food policy. This new transition brings about challenges for the various interest groups and their inter-relationships.

*First*, we now see an increasingly wider diversity of organisations playing a European role and seeking to influence as well as to articulate different knowledge concerning foods, health and ethical issues. For example, animal welfare groups and the consumer groups now have to tackle the intricacies of issues such as the precautionary principle, GM and traceability. Part of *Europeanisation* now involves accommodating a wider

and more disparate range of concerns and interests than those just associated with the quality of foods.

*Second*, there is a fundamental issue which *Europeanisation* and European policy rises in the context of devolution in the UK: European policy is reserved to the UK government, but much of its substance is devolved. Hence much European business needs agreement between the UK and the devolved authorities. Thus according to the UK government

*“around 80% of the policy areas devolved to the Scottish Parliament has an EU dimension”* (Bulmer and Burch 2001).

This situation heralds the arrival of a new multi-level governance of European policy within the UK. At the same time it means that the new devolved authorities (executive and parliamentary) must address the issues of *Europeanisation* as well as the natural context.

## **5.0 The evolving food regime II: rising consumerist & institutionalisation of policies**

### **5.1 The role of the state in building consumer trust**

The most universal needs and expectations of all consumers about the food they consume are safety, price and availability. The most basic role of public policy is to ensure that these fundamental consumer needs are met. Once they are met, consumers often exercise personal preference in their purchasing decisions. At this point, the market should be relied upon to provide consumers with such amenities, and government's role becomes one of ensuring that claims made by industry are not false or misleading.

One suggested lesson from the UK government's response to the BSE crisis was that its preference for a '*comforting*' approach to communicating with public rather than being more open about what was known and unknown, created

*“greater damage to commercial interests and triggered virtually unmanageable levels of public distrust”* (Randall, 2002).

Under these conditions actors fail to recognise that ‘*rival rationalities*’ and loss of trust are fundamental to the success or failure of risk communication, and contribute to a more politically controversial risk situation (Gutteling & Kuttschreuter, 2002; Margolis, 1996). In the face of an untrusting audience, *using more science* (and risk assessment) is believed to feed public concerns, because evidence for a lack of risk often carries little weight with the public. Trying to address risk controversies primarily with *more science* is in fact likely to exacerbate conflict (Slovic, 1999).

In the face of these challenges, increasing attention is being paid to trust in public institutions *and* science and technology and how greater understanding of *trust issues* can improve risk management and communication. A number of studies cite declining levels of trust in public institutions and science and technology (Randall, 2002; Petts & Leach, 2000; Trettin & Musham, 2000; Slovic, 1999). Trust is thought to be one of the most important influences on how people perceive risk and respond to risk communication (Petts & Leach, 2000; Finucane, 2000; Siegrist & Cvetovich, 2000). ‘Trust’ in this context can be defined as a person’s expectation that other individuals and institutions (in social relationships) can be relied on in ways that are competent, caring and predictable (Beckwith *et al.* 1999). Public trust may rest more on a faith in the capacity of the authorities to cope with the risk rather than remove it completely (Star, 1984).

Trust is also thought to be fragile, it is easily broken, but it is considerably harder to rebuild, and in some case cannot be rebuilt (Slovic, 1999). The fragile nature of trust can create difficulties in risk management and communication. Langford (2002) cites the British public’s response to the BSE crisis as an example of a loss of trust accompanied by considerable outrage, changing

*“not only attitudes and opinions, but something deeper to do with our accepted or taken-for-granted view of the world”.*

Marsh (2001) cites a need for re-skilling in agencies, which would enable more complex analyses of communities; shrewder strategies for engaging diverse communities and mediating between competing interests; more advanced skills and techniques for incorporating diverse aspirations into policies and programs. In the UK, in the *third phase* of food regulation, many institutions are adopting more interactive

and constructive dialogues with the public, and their degree of success is related to whether:

- Clear objectives for engaging in dialogue with the public have been set;
- It can be established that the exercise is fair, matches methods to particular purpose and situations, is well-timed, and uses principles of inclusivity to select participants with wide ranging interests;
- The quality of the processes can be assessed and outcomes can be examined; and
- Sufficient training and resources have been allocated bearing in mind the full economic and political costs of not doing so (Parliamentary Office of Science and Technology, 2001).

This has been a major objective of the Food Standards Agency in the UK. It emerged that they were striving to build consumer confidence, by *first* explaining in clear, unambiguous terms what the risks associated with food safety are.

*“I think it (consumer understanding of food risk) is improving, yes it can be quite technical and it can be quite difficult but if you have people there together it forces the scientists and the technical people to explain things in a way that everybody else can understand...”*

*Second*, clear and effective communication strategies could be achieved through increased transparency and stakeholder involvement (Podger, 2003)<sup>1</sup>, as it is widely accepted that trust and confidence in risk management are key to risk acceptance. Through “good” communication, trust is increased and therefore the acceptance of risk:

*“Because we operate in this open way, we consult on a day to day basis, both with food industry contacts and with consumer organisations. We have consumer representatives on all our scientific advisory committees, we have a consumer committee, so we can quote real consumers as opposed to consumer lobbyists, actually advising us on the actual decisions we’re taking. And one of the ways we’ve been working which we started right from the beginning, is using what we call Stakeholder Groups, in*

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<sup>1</sup> Speaking at the Conference on “Risk Perception: Science, Public debate and Policy Making” 4-5 December 2003.

*other words we have meetings, often in public, with a range of all our stakeholders all together so they're interacting with each other as well as with us.....". (FSA)*

*Third, by making people aware of the risk and supplying appropriate advice on action to be taken by them:*

*"We have to think about things like, when we're doing risk management, is it appropriate to ban something, or is it more important to focus on the risk communication and say 'this is the situation' and we're giving you the choice, we've given you the information and you decide whether to eat this or not. I think we're doing this more than we used to. .... we put more emphasis on risk communication than we did before we were in business. We're saying we think there's a risk there but we can't quantify it, but we think you should be aware so that you can decide whether or not you want to be a bit choosier about what you eat." (FSA)*

Other studies have shown that an increased public understanding of science alone is unlikely to influence acceptance of a particular technology that is perceived as potentially risky (Frewer, 1999). In the food sector especially traditional risk communication strategies, which focus solely on public education, are bound to fail. Experience has shown that presenting the public with educational material does not necessarily lead to better public acceptance. On the contrary, people tend to select information which is consistent with already held views and values. The Food Standards Agency (FSA) seems to adopt the latter strategy, However much remains to be seen, about the effectiveness of the strategy. As Frewer (1999) states, the public is quite capable of understanding the concept of uncertainty and thus should be provided with clear information about the uncertainties around risk. This in turn will increase perceptions of trust in information sources and better acceptance of emerging technologies.

Further, consumer reactions to information are often difficult to predict. This is true even for shopping behaviour after food scares have been widely publicised. Some will translate anxiety into changed behaviour immediately, while others will not change either through habit or in consequence of their belief in producer, retailer and government reassurances.

It is increasingly recognised that mutual understanding and consensus-building are the best ways to address the elements of values and fairness in risk decision-making. This in turn forms the foundation for public trust and confidence in public institutions.

Because objective facts are not always the basis for decisions, participation and citizen engagement in policy-making is necessary in the formation of acceptable public policy. This has been adopted by the FSA in the form of citizen's juries, for example.

Such a theory dictates that a successful model for risk communication must reconcile the views of scientists, the public and politicians in order to achieve a common understanding of complex risks leading to credible management options and credible policy development around risk.

## 5.2 Role of consumers and other interest groups in policy making

The old debates about consumer concern as rarely leading to action no longer completely holds. Private and public bodies of the food sector now realise that increasing consumer advocacy is set to be a powerful force in the market-place as a result of a combination of factors. Consumer power should not be underestimated. Powerful lobbying groups can facilitate consumer action. For example, in the case of GM foods, the call for action has been seen in the increased sales of organic foods. Effective and appropriate consumer involvement are essential to ensure consumer interests are taken into account to improve the quality of decision making, and to help avoid a recurrence of problems that have led to a decline in consumer trust and confidence in food and food policy-making institutions.

It was clear from the interviews that most of the consumer interest groups now claimed to play a pivotal role in influencing policy-making. They seemed to be more vociferous and responsive to consumer advocacy. The following excerpts from our interviews highlight this:

*"... it's ( food safety) an important issue because it's what consumers are really, are very much concerned about, and we are aware that consumers tend to see these issues as a bit of a package, there is safety, there's animal welfare, there is a natural form of production, there are these various values that consumers go for..."* (Consumer Group)

*".... in some ways we know that consumers have more power than government these days. At least that is what is said, and in some ways that's true. So, we go for trying to persuade consumers that they could*

*buy animal-friendly products. And we do that either through the media or education...*” (Consumer Group)

Some consumer interest groups were of the opinion that they can exercise more power in influencing the government in policy-making, only because they have the strong backing of the public. This is evident in the following excerpt of the interview with one of the consumer interest group:

*“...we have the power in as much as we tend to have public support on our side generally, and so if we can make that more obvious then we can hope to influence policy and things like that. ...the very large farmers have the time to be on National Farmers’ Union (NFU) boards and to get represented at the higher levels of the NFU where again, they have a great deal of power and influence within government although they have made themselves unpopular with foot-and-mouth and so forth...”*

The views reflected by the private interest groups were similar in line to the consumer interest groups, in that the consumers play a vital role in the policy making process, and the private interest groups in turn, value and communicate the consumers’ perceptions into the decision making process.

*“I’ve got personal views on consumer groups. A lot of the consumer groups do an awful lot of good, they are almost a kind of conscience of society and I think have a very important role to play in terms of ensuring that consumers perceptions are fed into the decision making process, but at the end of the day there has to be a balance at the various levels. I think they are knowledgeable, they are articulate”.*  
(Retailer)

Considering the importance of the consumers in the policy-making process, regulatory activity of the food control organisation should establish well-designed and well-publicized procedures for receiving and considering consumer and industry inputs at the policy-making level. A regulatory body interviewed in our research stated:

*“We have a division which is marketing and consumers and that provides us focus for consumer considerations.”* (DEFRA)

There is no doubt that the consumers are increasingly influencing food regulation by selection or rejection of food considered healthy or hazardous. Therefore large scale

retailing organisations and various consumer interest groups acting as intermediaries between the spheres of production and consumption are very sensitive to consumers' preferences and practices.

### 5.3 The implosion of the (now far more sensitive) consumer and producer divide

Over the course of the late twentieth century, market dominance by distributors and wholesalers gave way to dominance by manufacturers, followed by the current period of dominance by integrated distributor-retailers. One of the most controversial elements of supermarket's dominance of the food retail sector is their impact on farming. For many years in the UK there have been accusations that the big multiples are reaping excessive profits from the agri-food chain by "turning the screw" on suppliers and primary producers. The squeeze on farming (and farm-gate prices, specifically) is by extension, said to be affecting the resilience of the rural economy and quality of the environment.

Although the retail industry has been found to be broadly competitive (Supermarkets, 2000), the sheer scale and buying power of the global retailers makes them subject to increasing scrutiny, and a level of discontent in farming which has occasionally been expressed in militant action against stores and depots. Around 230,000 UK farmers trade with the majority of consumers via only a handful of supermarket companies, where UK consumers purchase 75-80% of their groceries (Euro Monitor, 2003). The profit of all those 230,000 farms has been roughly equivalent with the profit of just six major supermarket chains (Euro Monitor, 2003)

In comparison, to the producers' eroding power, retailers and traders have a powerful economic position, which enables them to wield a powerful position in the industry, to influence policy decisions. This was also highlighted in our interviews with the consumer interests groups.

*"... If you're talking about small farmers, medium sized farmers, family farmers, I think that they probably don't have very much influence at all."* (Consumer Group)

A possible way to narrow the divide between the retailers and producers was also suggested by one of the consumer interest groups, who stated:

*“... what we have to do is to make processors and farmers work with the retailer rules. The retailers are short hand for customers; they translate what the customer wants. Whatever people might think of retailers, they are very good at translating the customer needs. So, in that case we have no choice but to follow them, because they represent the customer.” (Farmers Union)*

From the preceding extracts it is evident that there is a widespread recognition among the various groups interviewed that effective and appropriate consumer involvement is essential; so as to ensure consumers interests are taken into account to improve the quality of decision-making, and to help avoid a recurrence of the problems that have led to a decline in consumer trust, and confidence in food and food policy-making institutions. However, this consumer involvement is seen as increasingly (and effectively) mediated through the corporate retailers. In the *third phase* of food regulation it was also recognized that there has to be a shift in attitudes, policies and practices so that consumer involvement is more at the heart of decision-making. There has been increasing government emphasis in recent years on greater public involvement in decision-making and service provision both in the UK and the EU. However, it is unclear whether the so-called consumer involvement these organisations promote is carried out to fulfil a formal requirement to do so- as a “box-ticking” exercise, or whether it is done to legitimise or avoid taking what might be an unpopular decision. It also emerges from the interviews that consumer voices from Non-Governmental Organisations (NGOs) and other consumer organisations are often regarded as ‘self-appointed’ and are not necessarily representative of the mass of consumers. Interviewees acknowledged that the setting up of the Food Standards Agency in the UK in 2000 represented a significant move towards greater consumer involvement in the food sector. The more recently created DEFRA has also committed itself to new ways of working but is seen as still at an early stage in developing more consumers - focussed strategies.

## **6.0 The evolving food regime III: the ensuing complex private interest model of food regulation**

### **6.1 Role of retailers**

The distinctive feature of the recent restructuring of the UK food chain is that it is retailer-driven. Retailers have a powerful position in the food system (Dobson &

Waterson, 1996; Fiddis, 1997), and through their traceability and quality assurance schemes (QAS) are able to influence the entire food production chain, and also importantly to define its margins. Due to retailer initiatives in new product development, and vertical and horizontal alliances, they play a particularly influential role in the market place, in terms of both food use and acceptability (Ellahi, 1996). Indeed, the quality/value system that each retailer applies, and the policies adopted, can have significant impacts on many of the other interested parties, such as producers and consumers.

The retailers' influential position is further heightened by the current retailer market and related management strategies. Food retailers and supermarkets have grown by 0.1% since 2001 to reach a value of £80.4 billion in 2002. Large grocery outlets dominate the food retail market with over 81% share of value sales in 2002, with the retail market leader, accounting for 25% of UK food retailing in 2002 (Euro monitor, 2003).

Innovations in own-brand products in the UK market further strengthen this position. These not only give retailers better margins, but also increase their negotiating position with manufacturer brands. Manufacturers find themselves in the position of both trading partner and competitor. The following excerpt from our interview with a consumer interest group draws attention to the powerful position of retailers.

*“...the retailers influence the policy making and the decision making quite significantly because they are extremely powerful and can influence the decision making in the products around the supermarket shelves. I think their role is may be one of too much strength.” (Consumer group)*

However, to remain profitable in a competitive environment, they must meet consumer needs. In order to facilitate competitiveness and ensure that share of the market is maintained, they endeavour to identify and anticipate consumer expectations in advance of sales (Hill & Merton, 1995) this is becoming more difficult. The behaviour of consumers is becoming increasingly volatile and concerned with the instant satisfaction of their wants (NRLO, 1998), and therefore, some retail policies can be of a speculative nature.

Customers today are no longer prepared to be dictated to by suppliers, and have become more assertive, more demanding, more individualistic and more affluent in their tastes.

The market power of consumers is seen as growing stronger as a result of fierce retailer competition; new technology and new business practices. The retailers are the self-selected barometers of this process.

Consumer market power is becoming ingrained through the increased use of retail scanning data to decide product assortment, prices and marketing strategies. Successful retailers have perfected the art of customising their service offering both hierarchically in socio-economic terms, and spatially in the judicious location of stores. This ensures they produce what customers want, when they want it, and at a price they are willing to pay, as one of the consumer interest group interviewed by us said:

*“Sometimes there’s been a tendency in the past to try and present themselves (retailers) as though they should really be the consumer organisations because they know their consumers; but they have the information for different reasons, for commercial reasons in order to take advantage of that. Sometimes we’ve found it very useful to work with the retailers, like on GM, they had a crucial role to play and completely were able to shift the supply chain and ensure non-GM supplies and at a time when the government wasn’t accepting any responsibility at all for GM and lack of consumer choice. So it was down to them that consumers could have a choice.”* (Consumer group)

Another consumer interest group argues,

*“The retailers have a huge amount of influence on certain issues, in the sense that they can determine what is sold in the shops and they’re very receptive to consumer pressure. So for example on GM crops they have effectively stopped the market through, because consumer pressure asked them to practically. In terms of government policy, we have found that some of the big corporations input, or the bio-tech companies, pesticide companies, and their associations like the Crop Protection Association, seem to be able to wield an enormous amount of lobbying power, and in many cases they seem to have very good links into the particular branches of government that deal with these issues”.* (Consumer group)

An explanation to this movement of power substitution of the state regulation seems to come from the change in food habits. The increase in consumers’ income and the transition to more “sophisticated” consumption has reduced the demand for undifferentiated products. The labelling and defining characteristics of quality are therefore directly linked to the competitive food retail market.

Additional influences on retailers’ roles and responsibilities are the potential failings in the market system. In the present “free-market economy”, although the government

intervenes to protect consumers from health and safety market failures, consumer autonomy and choice is highly valued; so that non-interference is favoured above paternalistic intervention as a guiding principle of government policy (i.e. the “nanny state” versus the freedom of choice). While consumers may ultimately influence or veto whether a new technology is successfully adopted through their purchasing power, consumer autonomy can be compromised by several factors. For example, if there are limitations on the availability and accuracy of information on a food product, market mechanisms may not always ensure that the desired controls are in place to maintain consumer confidence. In these situations, trust is transferred from legislators and the market to the retailer. These are increasingly perceived to act as a mediator of consumer interest. Hill and Merton (1995) note that

*“probably most consumers consider ensuring the acceptability of... practices (production methods) is the responsibility of the retailer”.*

It is argued that retailers have been able to respond to consumer needs, thanks to the “Information Age”, which has created significant new forms of marketing, communication and business. Customer information at all points of communication means that production can be tailored to an increasingly accurate degree, thereby saving money and increasing profit margin.

*“You keep an eye on what’s going on generally in the market and look at other market research you can really try and predict where things are going to go, going to develop. Other than that, try and predict what they think latest trends would be to probably give us some idea, of what we can or cannot do.”*  
(Retailer)

Moreover, in the light of the dynamics of the retailer-consumer relationship, retailers see their responsibilities as lying in several distinct areas of safe food and facilitating consumer choice. This is discernible from the excerpts of the interviews carried out with some private interest groups.

*“...what we need to make sure is we’ve got all the right procedures in place to supply those products to our customers so that they’re safe, good quality and legal.”* (Retailer)

*“...yes we want to chuck in things for the customers benefit and we do need to understand our customers and what they need.” (Retailer)*

The consumer interest groups were of the opinion that, on one hand, there were some retailers who were very forthcoming and innovative in satisfying customer demands.

*“Some of the big supermarkets have been far more reticent about making concrete moves in the right direction on animal feed certainly people like TESCOs. Whereas, on the other hand, you have more progressive supermarkets like the Co-op and definitely M&S who are just far more helpful. So you often hear from someone like TESCO who will say well actually we can't source non-GM animal feed even though our customers might want it. It's impossible. And then you'll hear from M&S the next day who say well actually we've already done it so it's an interesting situation”. (Consumer Group)*

*“There is a great deal of evidence to show that food manufacturers have improved the food supply in the UK over the last 20 years. In terms of food manufacturers they make some attempt, for example, to reduce sugar and salt in processed food but it is very marginal of what they have done, and it is also variable, so you have got some retailers who have been very good and very proactive in trying to provide some health initiative”. (Consumer Group)*

And, on the other hand, there were also some who for the fear of being “named and shamed” would adopt measures to satisfy and meet consumer needs.

*“I think it's a similar sort of line to the supermarkets because a lot of them, especially the bigger ones, had this idea that they weren't going to be doing anything more on GM so they were quite happy to just give us the cold shoulder, and last week we re-launched our shoppers' guide on the website and people have been phoning in and saying oh please, take us off the orange or the red list.” (Greenpeace)*

*“Yes, [in] some things they are very influential but I think it has its limitations working with them as well because of the way that they operate”. (Consumer Association)*

Consumer demand and its dynamic construction by retailers drive the entire food network. This demand is shaped by many factors. The most influential is the impact of the large multiple retailers on consumer selection and choice; through their contractual relationships with primary producers and food manufacturers, and their extensive promotional activity. A large majority of choices and decisions regarding food

consumption are made just prior to the act of consumer purchasing. The success of retailers in their own eyes has in the main been due to their ability to anticipate the needs and expectations of consumers, and to deliver to them a wide range of products of high quality and freshness at competitive prices.

*“...The freedom of retailers to provide their customers with the choice on what they want to buy, not the freedom to rip off or the freedom to poison, or the freedom to pull the wool over peoples eyes, what it is about is the freedom to provide the customer with the choices of the products they want to buy...”*  
(Retailer Trade Association)

The retailing industry continues its central position in the food system due to its capability to create and respond to the customers’ preferences. For example, when the distributors decide to label the products with GMO, or eliminate the ingredients of their own brands, this action has a cascading effect throughout the food industry, grain traders, and producers.

As competing interests from consumer lobbies and regulatory bodies have grown, retailers have been skilful in accommodating a wider range of the overall political shifts into their approach to promote their wellbeing. Corporate retailers at the EU level now operate both independently and jointly through organisations like Euro Commerce (Flynn, *et al.* 2004). In the UK, retailers have to position themselves continuously and carefully as custodians of the consumer, distinguishing themselves from both the producer and food manufacturing interests. As the increasingly integrated European food market continues to show major food safety problems, the retailers have taken the opportunity to further embed retailer-led supply chain management.

## **7.0 The evolving food regime IV: the Food Standards Agency in the context of the private interest model**

Despite the rising dominance and legitimacy of private interest groups the Food Standards Agency was established in the UK (in April 2000) to promote food safety and food standards as a non-ministerial department, focussing on the protection of consumers and their interests. Food quality and safety, it learned, were back in the

public (non-competitive) domain. The main aim of the Food Standards Agency (FSA) as set out in the enabling legislation in 1999 was:

*“to protect public health from risks which may arise in connection with the consumption of food (including risks caused by way in which it is produced or supplied) and otherwise protect the interests of consumers in relation to food” (FSA, 2001).*

Unlike its predecessor unit in MAFF, the FSA could claim to be free from direct sponsorship of any food industry sector and is answerable to the minister for public health.

The evolution of food regulation in the UK is driven primarily by the way food safety issues are perceived by large food retailers; leaving the state to act mainly as auditors rather than standard-setters and enforcers of the mainstream process. A hierarchical, private-public food regulatory regime in the UK predating the Food Standards Agency of April 2000 is schematically represented in Figure 1.

It is important, therefore, to evaluate the formal role played by the FSA in creating a difference to food governance in the UK given the continued development of private interest regulation. The private interest, consumer and social interest, and regulatory interest groups were asked about their views on the FSA’s move towards a more transparent and inclusive process of governance, that contrasts sharply with the seemingly closed style of governance by the Ministry of Agriculture Fisheries and Food (MAFF). The views expressed by the three major interest groups interviewed in the research are summarised here.

### 7.1 Private interest groups: not enough to name and shame!

The FSA’s *modus operandi* in restoring consumer confidence by adopting the naming and shaming process was severely criticised by most of the private interest groups.

*“.. Does name and shame really restore in the consumer confidence in food? What it has done (the FSA) is that it has established the Food Standards Agency as an independent organisation that is willing to “blow the whistle” on big commerce, big commercial companies in the way that MAFF was perceived by consumer groups as not doing. It would be good if it (FSA) actually really took on its mantle of restoring confidence, restoring consumer confidence, if it actually adopted a policy of name and praise.”*

(Retailer)

One of the guiding principles of the FSA is to be open and accessible (to which it is being seen in Government circles as achieving). However, the private interest groups see it differently:

*“Transparency does not necessarily equate with effectiveness. They’ve (FSA) not quite grasped that yet...” (Retailer)*

The FSA’s definition of ‘*consumer interest*’ was questioned by one of the private interest group, who stated:

*“we’re not sure what they (FSA) mean by consumer interests. Do they mean the interests of consumer organisations? If they’re talking about the interests of individual consumers, there are 59 million individual consumers in this country – each with a different set of priorities.” (Retailer)*

They further branded the functioning of the FSA to be politically motivated, by stating:

*“... the big problem is they (FSA) don’t have the evidence to determine why they’re seeking to change policy or to intervene in a particular area. And to that extent the FSA’s political. Now who the political drivers are within the FSA, on country of origin labelling or on assurance schemes or whatever – is in some areas difficult to say. But that is political. There is no doubt about it. Because they don’t have the evidence.” (Retailer)*

While there were criticisms on the way the Food Standards Agency functioned, some suppliers/manufacturers were of the view that the Agency has done a commendable job; and that it is now more willing to consult the industry. The transparent policy adopted by the Agency and the efforts made to dispel panic through its vast communication procedures among consumers were also appreciated.

*“.... things have changed now, for the better in the last few years, with the creation of the Food Standards Agency and DEFRA and they’re much more willing to consult with the industry.” (Food manufacturer)*

Views expressed by one of the private interest organisation reflect the fact that they appreciate the different mechanism of functioning of the FSA, as compared to the MAFF.

*“The Food Standards Agency definitely thinks differently to what MAFF used to be, they are far more willing to discuss complicated issues in public and through that come to sensible certain decisions, where MAFF would have been absolutely petrified of having the discretion in the first place. So the FSA is dealing with is actually the most noticeable things, it’s done easy, its just that everything is open. We don’t have secrets and their view is very clear that their view is to protect the customer.” (Retailer)*

## 7.2 Regulatory interest groups

The regulatory interest groups exhibited a very cautious attitude regarding their views about the setting up and functioning of the FSA.

*“..If consumers are going to have confidence in food they need to have a champion out there who’s guided by sound science, guided by and not dictated by the politicians and that’s, that was the suggested place for the FSA.”*

Two of the local authorities interviewed, felt that the FSA had been helpful in their overall (local authority’s) functioning, as is evident from the following excerpts of the interviews with them.

*“....FSA was quite helpful and checking now and then we were happy with the way we were going.”*

*“...since they were established. We have, a good relationship with them, and there’s a lot of mechanisms been put in place, and there is a good exchange of information between ourselves and the Agency.”*

## 7.3 Consumer & social interest groups

The views gathered from the consumer and social interest group reflect criticisms on the lack of co-ordination between the FSA and the DEFRA; and unease in the way the FSA dealt with the GM issue.

*“.....in terms of the objectives, in principle, clearly it’s positive we have an Agency now disconnected from other influences, supposedly and apparently. They’re purely and simply looking at what’s best from a food safety point of view, giving a view, whether that view is then accepted and put into implementation. So on the face of it that can be very positive. The negative side of that is from our experience, unless there’s an improvement in the co-operation between the FSA and for example DEFRA, there can be times when they will give a view in isolation and not really appreciate the implications of what they’re saying.”*

On the issue over the GM free labelling, one of the consumer interest group had the following view about the manner in which the FSA acted:

*“...we couldn't really understand why the FSA ... this independent food watchdog was acting so outrageously... the FSA was an independent food watchdog, but everything they've ever done on GM and organics proves that they're not... it just strikes me that they're not being balanced and they're not really being independent ....”*

However, some consumer organisations appreciated the role played by the FSA, and were impressed by the consumer focussed approach adopted by the FSA.

*“Some things have changed since the formation of the FSA. There is a difference between transparency and openness which is difficult to measure and it is early days to know and there are also issues about whether always being transparent is beneficial....”*

*“We have been quite impressed with the consumer focussed approach that they've taken and that's been helped by the way that the board meets in public and when we talk to individual board members they do feel personally responsible for the FSA and it fulfilling its role.”*

What is evident from these analyses is that, most consumer interest groups appreciate the new role played by the FSA, especially in putting consumers first and having consultations with many consumer groups. However, not many are in favour of the transparency approach adopted by the FSA, as they feel this approach may stifle new evidence.

The scope of the FSA's remit offers potential for joined-up policy thinking along the whole food chain, but it has been interpreted in fairly bounded terms. In practice, its rationale remains rooted in the dominant retailer-led paradigm. The Agency's responsibility extends beyond food safety to include matters concerned with food quality, consumer protection and choice; but, as demonstrated with its posturing with regard to GM and organics it steers clear of engaging in systemic discussions about supply chains, and how they might be redeveloped. Its effectiveness however, depends in part on the extent to which it is trusted by the public to provide reliable and impartial advice. Securing this trust largely depends on how the Agency identifies and takes appropriate action in response to risks to food safety and the public's concerns; the

extent to which the public recognise the Agency as the authoritative source of advice and information on food standards; and how transparent the Agency is in its decision making and engages those who have an interest in food standards.

## **8.0 Discussion & conclusions: the emerging hybrid model**

The paper has identified five significant recent developments in which the State, corporate and private interests, consumers and social interest groups build relationships in response to the need for accountability within the agri-food chain. This represents the development of a more complex public/private set of relationships- *a third phase* of regulation- which now embodies new public institutions (like the EFSA and the UK FSA) and a greater competitive ‘battle’ to win over the hearts and minds of consumers.

The results of the research show *first*, that there is indeed a significant trend towards *Europeanisation* of food policy in the UK. *Second*, there is a growing institutionalisation of these policies, and the related empowerment of a different set of interest groups when specific issues e.g. GM- food, BSE and a multitude of other food safety issues are concerned. *Third*, private interest groups (particularly retailers) are increasingly playing a major role in (re)shaping the UK food policy.

Nevertheless, there was consensus on issues of common interest, and there is a more flexible and participatory relationship between the private interest, policy and regulatory interest and consumer and social interest groups. The latter indicates that this is an amalgamation of a state-private sector model of food regulation; where there is a specific response from public and private sectors to the various pressures on food regulation (for example see Smith *et al.*, 2004). It is worth noticing that this complex model is emerging as a response to the (post BSE) food regulation pressures in ways which safeguard the broader macro-economic and political concepts of the European Internal Market (EIM) and increasingly integrated exchange of food goods within and beyond Europe, while also simultaneously enunciating new standardised and ‘non-competitive’ controls in the name of the European consumer and public interest.

The emerging model of food regulation may have begun to lay a foundation for a more, all-inclusive and business-led regulatory system based on appeasing consumer and private sector apprehensions. The new and distinctive stimuli for this have arisen partly

due to the more exigent and intricate food risk environment And it appears (in the context of the UK at least) as though this trend will be maintained by, the interaction of a larger number of actors and policy networks (Fig 3), which, in turn, makes the evolution process more complex and potentially contingent.

This does not diminish the role of retailer-led private regulation as suggested in the earlier second phase of food regulation. It came out very strongly in the research that retailers, in the name of the consumer and public interest, are more influential, in food policy-making in the UK, partly as a result of their knowledge of and authority over the constructions of the consumer interest. As one consumer interest organisation stated:

*“both legislators and consumers, are pushing (policy making), certainly from the consumer point of view.”*

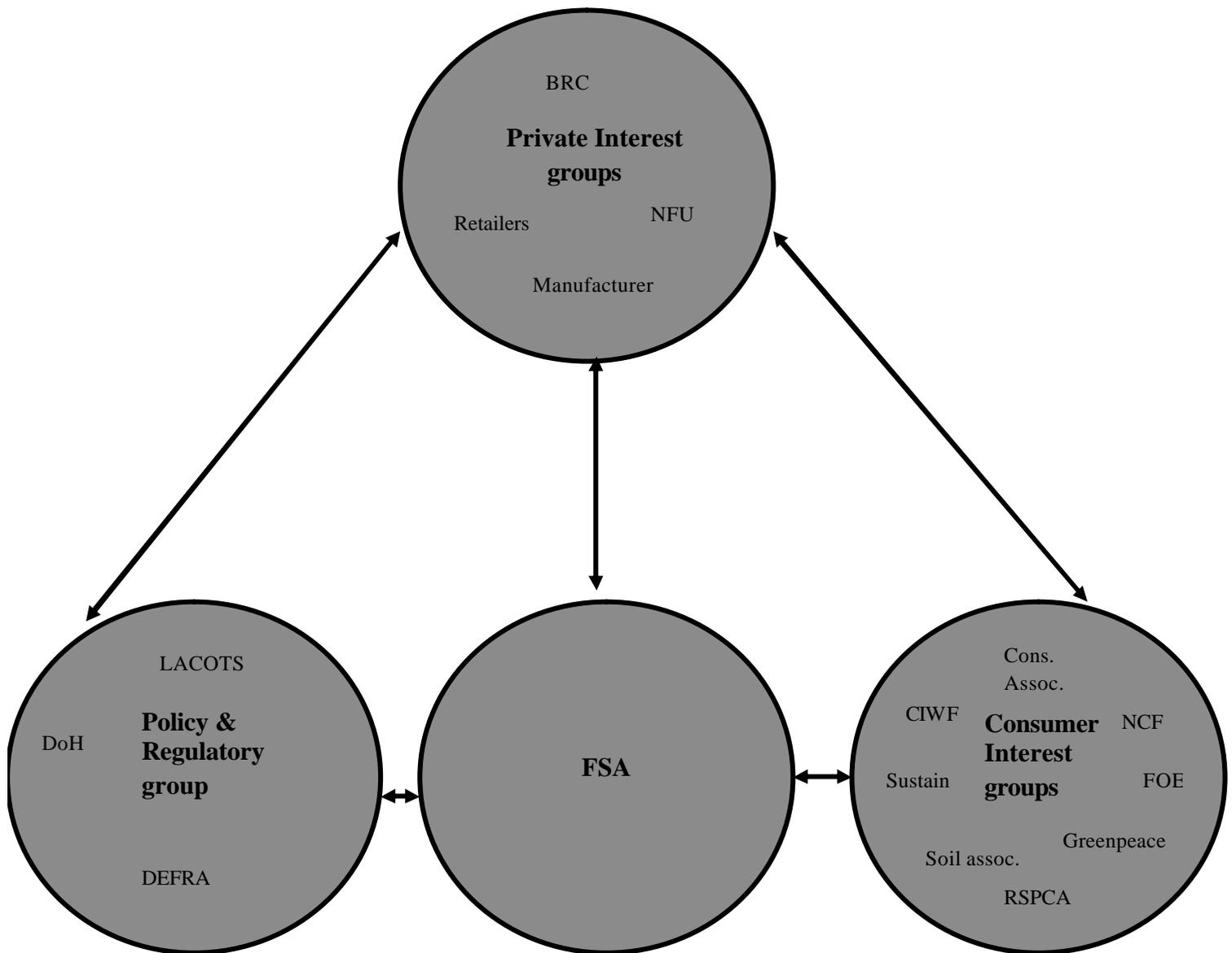
*“The consolidation and internationalisation of the food retail and manufacturing industry can be expected to continue”,*

according to the conclusions of an influential report<sup>2</sup>. One question therefore is: what does this mean for consumers? Despite the increasing power of both manufacturers and retailers, it suggests that it be consumers and those bodies most closely allied to them who drive the food supply chain in future.

The new consumer is increasingly influencing the food system by selection or rejection of food considered healthy or hazardous; and large scale retailer's organisations acting as intermediaries between the production and consumption are very sensitive to consumers' preferences.

The importance of some key consumer trends (e.g. comfort, health, variety, individuality, enjoyment & security) can be evidenced in several important developments. *First*, the different links in the supply chain are increasingly attempting to communicate more directly with the end customer as they vie for that consumer's business. *Second*, all the players want to have a greater impact on the shopper's buying behaviour. Retailers are trying to influence the consumer mindset by presenting

**Fig.3: The emerging food policy formation network in the UK**



- BRC - British Retail Consortium
- NFU - National Farmers' Union
- LACOTS - Local Authorities Coordinating Body on Food and Trading Standards
- DoH - Department of Health
- DEFRA - Department of Environment, Food and Rural Affairs
- FSA - Food Standards Agency
- CIWF - Compassion in World farming
- NCF - National Consumers' Forum
- FoE - Friends of Earth
- RSPCA - Royal Society for the Prevention of Cruelty against Animals

<sup>2</sup> Report based on surveys with senior food executives and policy makers in 19 countries, along with extensive market analysis from consultants Cap Gemini Ernst and Young, 2003.

themselves as a brand. Indeed, brand competition is a key battleground between retailers themselves, and between them and the large food manufacturers.

Marsden *et al* (2000) noticed a pendulum movement during the 1990s in which the deregulation in food markets and the disappearance of representative (production-based) corporate organisations were gradually occupied by large-scale retailer's organisations. According to the authors,

*“retailers, given their pivotal position in supplying choices and enhanced degrees of freedom conferred on them by government, become acutely important for the legitimisation of the state and more specifically for the management of the food system on behalf of the state and the consumer interest”.* (p.193).

While this power has been maintained and developed as they have sustained their market and regulatory power, the governance of food has now also, again become a territory for new state and consumer bodies.

The overall tendency of food regulation, in this emerging and flexible framework therefore, appears, to generate more complexity due to uncertainty and risk related to food safety, as well as to reshuffle the power relations between different food supply chain players. In an effort to minimise food risks for consumers without creating impediments to the internal markets, these new relationships between the state, corporate and non-corporate private and public interests has begun to offer a more practical and accountable food system. However, these new relationships could usher in other costs, such as a loss of local and regional diversity in food production and preparation (Smith *et al.*, 2004).

Thus, the new emerging third phase model of food regulation outlined in this paper; developing through the five dimensions analysed, suggests that retailers are now much more influential in controlling the quality and ‘value pathways’ of foods from ‘farm to fork’. However, the emergence of private-interest regulation does not steer clear of the need for the State to protect the consumer interest as it once might have done (as in the second phase of food regulation outlined above). Now, private interest regulation needs a consultative and ‘stake-holder’ State such that it can appease growing consumer

concerns about the conventional food supply system. However, it does shape the ability of the State to act in the interest of the consumer. The need therefore is to map out its effects and impacts, and to measure how this model continually metamorphoses to the constantly emerging pressures of the 'risk society'. The re-organisation of public food regulation through the setting up of the Food Standards Agency has been a significant introductory step in this regard. In this research we also set out to seek the formal role played by the FSA in creating a difference to food governance in the UK. The views held by the regulatory, private and consumer interest groups on FSA's moves towards a more transparent and inclusive process of governance, positions the FSA as still in its infancy. And its effective functioning and acceptance as one of the UK's reliable source of advice and information on food needs to be seen in its broader complex, public/private regulatory context which has begun to be outlined here.

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## **Annex**

### Private interest organisations

- British Retail Consortium
- Unilever
- National Farmers' Union
- Somerfield
- Sainsbury's
- Northern Foods
- Heinz UK
- ASDA

### Regulatory interest organisations

- Gloucester City Council
- LACOTS
- DEFRA

### Consumer & social interest organisations

- UK FSA
- RSPCA
- Sustain
- The Soil Association
- Compassion in World Farming Trust
- Consumers' Association
- Friends of the Earth UK
- Greenpeace UK
- National Consumer Federation





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