

CHAPTER FOUR: Mad cows and angry consumers. The reinvention of food (safety) and farming in England

4.1 Introduction

The present chapter explores the ways in which food (safety) has been taken up as a policy issue in England and the changes and continuities in the meaning of food (safety), in particular since the 1990s.⁵⁷ The chapter consists of three main sections: Following this introductory section, section 2 contextualizes the events related to a series of food scares in the socio-historical context, highlighting, in particular, some of the key developments in UK food (safety) policy since WWII. Section 3 provides a descriptive account of the BSE epidemic in 1996 but also recounts the events around Foot-and-Mouth-Disease (FMD) in the UK in 2000/1, the impact of which has often been neglected in the existing literature. Subsequently, the section presents the institutional rearrangements that followed, capturing them in terms of the theoretical notions introduced in chapter three.

Section 4 presents the discourse analysis of food (safety) policy in England. In order to explain the specific ways in which food safety has been taken up in England, the analysis reconstructs the discourses that inform contemporary food (safety) policy in a systematic way and, importantly, shows how discourses materialize into practices within and across five inductively distilled discourses: those of ‘good governance’; ‘environmental sustainability’; ‘market efficiency’; ‘consumer protection’; and ‘public health’. Together, these discourses form the overall policy discourse on food (safety) in England. Table 4.1 provides a summary of the notions narrated in section 4. The top cells schematically illustrate the corresponding discursive clusters of practices for each discourse, that is, the discursive constellations wherein policymakers, scientists, members of the industry, and citizens come to take on overlapping and shared discourses. In the final section, the chapter recapitulates the findings for the English context and draws conclusions.

4.2 A history of food (safety) policy in England

4.2.1 Food (safety) since the nineteenth century

This study begins its journey in the 19th century, at a time when food (safety) gradually reached the political agenda in England. Over two centuries the Agricultural Revolution had resulted in the enclosure of most open fields and common pastures and the integration of crop and

⁵⁷ I focus on England in this study out of consideration for the considerable cultural differences between Northern Ireland, Scotland, Wales, and England, while the institutional rearrangements discussed here (for instance, the establishment of the Food Standards Agency) concern the United Kingdom (UK) as a whole.

livestock production: the era of Victorian ‘high farming’ (Turner 2000: 2). The late nineteenth century up until the early twentieth century saw a decline of UK agriculture due to imports of low-priced agricultural products such as wheat, wool, meat, and dairy products. Alongside this development, the dominant *laissez-faire* policy produced an increase in restructured, larger farms (ibid.).

The 19th century also witnessed a wave of publicly articulated food (safety) concerns, as well as concerns over swindling and adulteration. Beyond concerns of food safety strictly defined, that time period saw the emergence of the so-called *Temperance Movement*, which emphasized the need for ‘purity’ in foods, while medical officers were concerned with health effects, and public officials primarily with the prevention of fraud (Draper and Green 2002: 612). Overall, Alison Draper and Judith Green (2002) contend that, at the time (and in fact until the mid-twentieth century), the food (safety) governance regime mirrored the construction of a public as ‘passive and largely ignorant [and] in need of protection’ (Draper and Green 2002: 611).

In 1820, Frederick Accum published a treatise on food adulteration and culinary poisons, warning that there was ‘death in the pot’ (Humphrys 2001: 38). This constituted the first time that the subjects of fraud and safety were discussed in the open, and in a scientific manner – even though food adulteration was by no means a new phenomenon, going back to ancient Rome. Accum’s treatise, along with individual medical doctors publishing food tests and the popular cartoon-magazine *Punch*, led a critical debate on food adulteration in the mid-19th century, where ‘questions were asked about why there was no adequate food legislation and why people were not being protected’ (Humphrys 2001: 41). Pushed for by these critical voices, a number of parliamentary committees were set up that finally led to the introduction of the 1860 Adulteration of Foods Act. By setting compositional standards such as for what constitutes ‘milk’, this first piece of legislation codified a discourse within which certain claims (to rights and to governmental responsibilities) could be made.

During World War I (1914-1918), the Ministry of Food was created in 1916, when food shortages hit Great Britain. Whereas the first two years of the war had gone by without major threats regarding food shortages, in 1916 a campaign for increased food production was launched, provoking acute controversies. Lord Ernle (1956) understands what he refers to as the ‘food campaign’ as ‘an experiment of State control’, the results of which were ‘largely influenced by patriotic feeling and special circumstances’ (Ernle 1953, online edition: page unknown). In reference to the agricultural and food policy at the time, he further observes that ‘in its general principles, the policy of the plough was imposed on the agricultural industry by national necessities [and] [b]roadly speaking, the country wanted the largest possible quantity of food in

the shortest possible time' (ibid.). This policy discourse expressed itself in the appointment of Lord Devonport as *Food Controller*, who was to regulate the supply and consumption of food and to encourage food production, and in the 1917 introduction of subsidies for corn (in the form of guaranteed prices). In addition, a Food Production Department was established by the Board of Agriculture in 1917 to organize and distribute agricultural inputs, such as labor, feed, fertilizer and machinery, and to increase output of crops. At the same time, since the establishment of the aforementioned Adulteration of Foods Act (1860), 'food scares' caused by negligence (e.g. fish and poultry contaminations) had strengthened the call for regulatory action on food (safety). In 1919, the Ministry of Food was established, and so was the Council of Agriculture for England. This also implied a growing involvement of farming representatives, such as the National Farmers' Union (hereafter NFU) founded in 1908, in food (safety) policymaking.

Michael Winter suggests that the growth of the NFU represented one of the most important factors in the story of twentieth-century British agriculture (1993: 84). In contrast to previous organizations that had either relied on overly broad or overly narrow representational claims, the NFU avoided taking antagonistic positions vis-à-vis landowners, while at the same time suppressing the articulation of class-based discourses in the domain of food production practices (Winter 1993: 82-5). Arguably, this avoidance of clear alignment facilitated the discursive institutionalization of farming interests, as it produced an image of inclusiveness. At the same time, the discursive notion of class in relation to food (safety) was not to disappear entirely and remains, till this day, at the margins of English policy discourse on food, as both academic scholarship and interviews with journalists and non-governmental organizations (NGOs) demonstrate.

In the inter-war period, a new kind of 'protectionism' emerged, advocated by business which had benefited in the war and was now suffering under the free trade shift. Winter (1993: 90ff) suggests that this 'new protectionism' was based on pure commercial interests, and perhaps additionally the fear of war in the early 1930s, whereas I would add that the shift towards protectionism also relied on a narrative of self-sufficiency and a crisis of Britain's identity as an economic power. In addition, the discourse of 'marketing' entered food (safety) policy discourse, institutionalized in organizations such as the Milk Marketing Board. Against this apparent influence of the industry in policymaking, however, a Consumer Panel and a Committee of Investigation were also established within the MAFF, which may suggest at least a marginal presence of a consumer movement at the time.

With the war approaching, the 1930s saw the mobilization of a broad malnutrition campaign that was concerned with equitable food distribution. The campaign's mode of operation

included publications such as *Food, Health and Income* (1936) by John Boyd Orr and films such as *Enough to Eat?*, which was made with funding by the gas industry (Smith 2007: 569ff; Smith 1997). Orr, in particular, defended the need to tackle the problems of both nutritional under-consumption and chronic agricultural over-production, and was closely connected with the international movement for the ‘marriage of health and agriculture’ (Smith 1997: 152-3; Lang and Rayner 2003: 67ff). With WWII, however, it seemed as if this critical, left-wing movement lost its momentum and became even more marginalized and disintegrated, at a time when concerns about sufficient food supply and a reduction of import-dependence came to be core elements in food (safety) policy discourse. During the war, nutrition experts gained considerable influence in policymaking, given the need for rationing and sustaining the population during times of shortage (Smith 1997). Another factor that may have shaped post-war British food (safety) policy consists of the fact that Britain was strongly import-dependent before the war, with only around 40% of food supplies produced domestically. In contrast, as a consequence of the war, and particularly through food rationing and increased controls on (imported) food distribution, import rates were cut by half (FSA 2004b: 4).⁵⁸ Ultimately, in the early 1950s, food scarcity concerns were eased and food rationing came to an end – though notably much later than in other parts of Europe. The next section discusses the particularities of the post-WWII policy discourse in more detail.

4.2.2 *Post-war food (safety) policy*

Despite the alleviation of food scarcity, the NFU retained its paramount policy position and, along with the Ministry of Agriculture, set the tone for a considerable part of the postwar policy in the domain of food and agriculture. In fact, the Agricultural Act of 1947 had given the NFU a statutory right to be consulted over agricultural policy and, hence, the Department’s and the farmers’ interests became indivisible, based on a shared discourse of the benefits of agricultural expansion, which was exclusionary towards those outside the institutionalized consensus. As Robert Garner (2000: 198) points out, ‘[e]ven when the opposition to intensive farming became more vocal, not least through the activities of environmental groups, the closed agricultural policy community still prevented those issues from being part of the mainstream policy agenda’ (see also Smith 1993). In other words, the stabilization of the meaning of ‘food safety’ in post-

⁵⁸ Martin Turner (2000: 26; footnote 5) usefully lists a host of literature concerned with post-war development and direction of agricultural policy in Britain. Below follows a sketch of those developments most pertinent to the object of inquiry of this study.

WWII policy discourse entailed the exclusion of alternative ones, such as those related to environmental sustainability.

This policy discourse was also upheld by the increasing mechanization that, not unlike in the rest of Europe, had progressively been replacing the use of horsepower since the 1930s, which allowed for a reduction in the agricultural workforce and a remarkable increase in productivity – which in turn fed into postwar food (safety) policy as outlined above. In order to preserve as much food as possible for human consumption, the MAFF encouraged the use of non-food industrial by-products in compound feeds. The 1950s and 1960s witnessed a tremendous growth in the rendering industry, and feeding MBM to cattle became standard practice in the context of intensified farming.⁵⁹

The government devised a new food (safety) policy that was largely based on maximizing production – as a result of which farming practices, and consequently rural landscape, changed, and food prices fell considerably (cf. FSA 2004b: 4-7; Humphrys 2001: 5). As noted above, food rationing programs were continued after the war, and were even enforced more strictly than they had been during wartime. Bread was rationed from 1946 onwards; this was largely due to the necessity of feeding the population of European areas coming under Allied control, whose economies were in a state of devastation. In fact, the end of all rationing did not come until 1954 in the UK. Arguably, the extended period of food rationing, which included, for instance, a massive decline in food diversity such as in cheeses (as a consequence of the centralization of the dairy industry), proved traumatic for England's food culture (EN6-G; EN9-J; EN12-G).

Beyond sufficiency, post-war food (safety) policy in the UK was chiefly concerned with nutrition aspects: The National Food Survey was introduced and became the longest-running continuous survey of household food consumption and expenditure in the world. By 1953, the importance of the work of the Ministry of Food appeared to decrease rapidly due to the end of food rationing, and increasingly stable food supplies and arguments in favor of administrative convenience and efficiency finally led to institutional fusion and the establishment of the MAFF. Due to the already heavy workload of the MAFF, a limited amount of work on food hygiene and welfare foods was transferred to the Department of Health (FSA 2004b: 8), leading to a dispersal of responsibilities for food (safety). Food standards implementation was highly localized compared with a number of other European countries, including Germany and France, and the dispersal of responsibilities implied insufficient transparency as to who was authoring policy, with which audience in mind, and to whose benefits. In such a vein, *The Times* newspaper

⁵⁹ MBM was already described as feedstuff in Europe and the United States of America as early as the 1920s; see for instance Thompson (1931) *The Use of Meat Meal in Calf Feeding: Some Recent Experiences by Farmers*.

commented upon this institutional rearrangement (that brought about the MAFF) that ‘it is asking too much of any Minister to be able to hold the balance fairly between the interests of the consumer and the powerful agricultural interest’ (cited in FSA 2004b: 60). Such concerns about consumer representation within the MAFF, and the notion that producers were put before consumers in agricultural and food (safety) policy, never entirely disappeared, as will become clear in this chapter.

The post-WWII policy discourse as described above was also shaped by and performed in the early CAP and its dominant policy discourse of productivity and strengthening of the internal market. Based on a shared, largely unquestioned policy discourse of food sufficiency and maximizing productivity, as Martin Smith (1991) points out, during most of the post-war period, food (safety) policy was formulated within a relatively closed policy community whereby issues regarding food (safety) policy were largely treated as routine and technical decisions.

In the early 1980s, however, a series of food safety issues triggered public concern and awareness: Apart from the salmonella affair in 1988, the occurrence of listeria poisoning related to soft cheese and cook-chilled meals hit the news, as well as an epidemic of botulism that was linked to faulty processing (FSA 2004b: 52-3). Next to these concerns with food *safety* the public health aspects of poor diets made for headline news, as the government resisted a report that compiled nutrition advice and recommendations for healthy eating. The 1983 NACNE report (National Advisory Committee on Nutrition Education) challenged the dominant assumption that diet and healthy nutrition were merely a matter of choice and hence turned nutrition into a political issue (Food Commission 2005: 5-9). Since then, food *consumption* never fully disappeared from the public agenda, and, indeed, the debate was going to broaden in the decades to come, as we shall see in the following subsection.

4.2.3 From productionism to the ‘new food movement’

In response to, and alongside the developments recounted above, the 1980s also saw the growth of a ‘new food movement’ (Lang 1997), which had some of its roots in socialism, trade unionism, and public health advocacy. The movement included, for instance, parents’ alliances and nutritionists, but also health campaigners with a Marxist background. This collection of citizen groups was concerned with food access inequalities, the relation between food and public health policy, and the environmental impact of farming. The emergence and growing strength of this movement manifested itself in the establishment of a range of NGOs, such as the *National Food Alliance*, the *London Food Commission*, *Sustain*, the *Soil Association* (now a certification body in addition to its campaign function), PAN UK (Pesticides Action Network), the *Food Commission*,

Friends of the Earth, and the *Politics of Health Group*, which criticized the national health care system and the stark inequalities of access to health care in terms of social class (Lang 1997). Despite – or perhaps because of – the diversity of issues that were taken up by these groups, the topic of food (safety) formed a common theme, as it could be discursively connected to environmental concerns, health policy, children’s health, and food poverty. As an indication of the proliferation of food (safety) concerns during that time period, it is further interesting to note that the 1985 Labour party manifesto included a critique of the food system, in particular regarding food inequalities and health aspects:

It is the extent of poverty, the *domination of the food industry* by a small number of large companies, and the present agricultural policies of the European communities, which, among other influences, now *dictate what people can and cannot eat*. [...] [W]e [the Labour party] will be providing people [...] with a *wider choice of healthier foods* and also the information they need to make sensible decisions about their diet (Labour 1985: 4, emphasis added).

As indicated above, the movement included concerns such as public health and inequalities of access to healthy foods, environmental pollution, malnutrition, and last but not least, the safety of food. Another ‘common denominator’ that characterized the collective identity of the alliance consisted of the ‘left-wing’ critical position vis-à-vis the (‘domination of’ the) food industry as well as vis-à-vis the developments concerning EU agricultural policy for its financial costs and, for some, its environmental implications. At the same time, the notion of (food) *choice* was present in the policy discourse at the time, not least because of the influence of the consumer movement in the preceding decades, exerted through institutions such as the National Consumer Council (NCC; see NCC 1988) and the Consumer Association (established in 1957, now known as *Which?*). As we shall see in chapter five, the growth of consumer advocacy groups in the English context stands in stark contrast to the developments in Germany, where assertive articulation of consumer *rights* remained marginal (at best) during that time period.

In England, as early as in 1988, for instance, the NCC (1988, cover page) called for an inclusion of consumer concerns into food (safety) policy:

Food policy is *important to all of us*. It affects the *safety, choice, nutrition, quality, purity* and *price* – of food on the supermarket shelves. It governs how food is produced and marketed. *The view of consumers* must be taken into account when decisions about food policy are being made (emphasis added; cf. NCC 1992).

Tim Lang (1997), who himself was a prominent activist at the time, understands the origins of this ‘new food movement’ to lie, in part, in the ‘radical science movement’, which was represented by the *British Society for Social Responsibility in Science*, founded in 1969 (Smith 2007: 569). During the 1970s, Lang explains, the Society focused on work hazards and critical analyses of the food industry, whereas the more high-profile food campaigns during the following decade were made possible by a more professional approach and funding provided by the Greater London Council. The fact that public funding was provided during the 1980s already suggests a certain institutionalization of a food (safety) discourse critical of the status quo, and, similarly, the coalitions built at the time indicate a gradual internalization of this food (safety) discourse, such as in coalitions between medical organizations, consumer organizations, local authorities, and health officers, as well as retail chains, in the case of the anti-food irradiation campaign (Lang 1997; Smith 2004: 569).

To Lang’s line of explanation, however, I would add that, first, the occurrence of salmonella in eggs, as well as concerns regarding food irradiation,⁶⁰ played an important role in creating awareness and strengthening a food (safety) discourse. Second, calls for better regulation, as indicated above, had been latent since the late 19th century, and the salmonella-related events may have functioned as discursive openings for those latent discourses. As Mette-Marie Roslyng observes, ‘the latent conflicts related to food poisoning became apparent with a particular dislocating event brought on by the Minister of Health Edwina Currie’s remarks on TV [in December 1988] that “most of the egg production in this country, sadly, is now affected by salmonella”’ (Roslyng 2006: 1; cf. Roslyng 2005). This event, as Roslyng illustrates by means of a media analysis, appeared to create the conditions for a counter-reaction from the public and various interest groups against intensive farming and related practices (Roslyng 2005: 1-3). The significance of the salmonella affair consisted of its construction as requiring wider changes in the formulation of food (safety) policy. A combination of factors, such as the increased activity of interest groups, the impact of the CAP and changes in the retail sector helped transform the food (safety) policy community into an ‘issue network’, Smith (1991) argues.

Perhaps as an indication of the success of the movement described above, in 1987, a voluntary scheme for marketing organic produce was set up by the MAFF. The organization ‘Food for Britain’ set up the UK Register of Organic Food Standards, to establish new standards

⁶⁰ Food irradiation was promoted by some as a preventive measure against food poisoning and to reduce food spoilage by extending the shelf life of particular foodstuffs; others expressed concerns regarding its possible health impact, as well as food safety and environmental damage (FSA 2004b: 43-4; see also Ashwell 1989). Under the Control of Irradiation Act (1972), irradiation was banned, while in the subsequent decades, certain exceptions were introduced. The FSA is currently charged with supervising the latter.

that would be based on a voluntary code of practice.⁶¹ The board that was to develop the organic food standards included representatives from Organic Farmers and Growers of Scotland, the British Organic Farmers, the Soil Association, the supermarket chain J Sainsbury, and the NCC (FSA 2004b; cf. Draper and Green 2002). The membership of the board indicates a growing coalition between discourses of environmental sustainability and consumer protection as well as rights.

The shared notion of the need for safe food made such cooperation possible, yet it did not make it unproblematic: As food prices increased due to the said organic standards, the organic option for safe food was not open to many consumers and many producers. Homegrown organic food was relatively expensive, and imported products even more so. These factors aggravated the contentious nature of food (safety): As 'good (organic) food' had been associated with its beneficial influence on health, it seemed discriminatory to present (only) the pricier organic food products as safe food while the consumption thereof remained restricted to those who could afford it. In other words, the introduction of the standards – and the failure to establish the large-scale sales of organic produce that policymakers had hoped for – made visible an element of class-based inequalities related to food (safety). This also illustrates well the political implications of the different meanings associated with food (safety) - and food quality, for that matter.

In 1989 the NCC issued its *Food Charter for Consumers*, and in 1992 the NCC book *Your Food: Whose Choice?* (NCC 1992) reiterated the call for a new independent agency that would be responsible for food (safety), standards, pesticides, food science, and nutrition. The Food Safety Act in 1990 primarily charged producers with ensuring food safety. In contrast, the NCC called for an agency that was to have prime responsibility for regulation, inspection, enforcement, and consumer protection, and whose work would be characterized by independence, transparency, public funding, and accountability to a minister, either in the Department for Trade and Industry, the Department of Health or within a new Consumer Protection Department. As we shall see later in this chapter, in the late 1990s, calls of this kind came to be mirrored in the reactions to the announcement of the linkage between BSE and nvCJD.

Parallel to the developments recounted above during the 1980s and early 1990s, the MAFF encountered more serious criticism and became open to censure for having put producers before consumers. In the 1980s, however, under the Conservative Government, policy discourse

⁶¹ By the end of the 1980s, a range of certifications had become established. The two most prominent were the relatively loose organic standards of the Guild of Conservation and the stricter standards of the Soil Association. The latter organization, for instance, permitted only much lower levels of chemical pest control than did the former (FSA 2004b: 46).

continued to frame food safety as a matter of the industry's responsibilities and food safety policy formed an element in the overall aim for de-regulation in favor of market efficiency. This policy paradigm could be seen to have limited the potential impact of nutrition and food (safety) campaigns by scientists and environmental groups alike at the time (Millstone and van Zwanenberg 2005: 59-61). As a response to public concern following a series of food scares – such as those related to food additives, pesticides, and salmonella (cf. FSA 2004b; Roslyng 2005, 2006), the government installed a Food Safety Directorate within the MAFF in late 1989. In addition, the MAFF formed a Consumer Panel in 1991, which represented various consumer groups vis-à-vis the government (Millstone and van Zwanenberg 2002: 601). Even though the influence of consumer groups within the MAFF formally increased, it was restricted to certain areas of governmental work. There was little indication of consumer groups having anything but limited or sporadic influence on agricultural policy. As will be illustrated below, these constellations, and the discourses that informed them, were to change.

Below, in the second main part of this chapter, I first recount the events of the BSE crisis as well as the institutional responses to it, in sections 4.3.1 and 4.3.2, respectively. Subsequently, sections 4.3.3 and 4.3.4 discuss the impact of yet another traumatic moment in the history of English farming: the outbreak of FMD and the related institutional interventions. These, however, should not be seen as separate from those that were set in place in the immediate aftermath of the BSE episode; instead, they should be considered as a continuation thereof, which was made possible by the experience of FMD. Since a double-focus on BSE and FMD in the English context illuminates the influence of the former on the reactions to the latter disease, the section below gives an account in considerable detail.⁶²

4.3 The changing governance of food (safety)

4.3.1 The history of BSE

As indicated in chapter one, the UK was initially considered to be the 'original' - and indeed the only - BSE-infected country. As early as in October 1987, BSE made the headlines of a UK newspaper, which spoke of an 'incurable disease wiping out dairy cows' (*Daily Telegraph* 1987). At the time, BSE was largely believed to be an animal disease; in other words, the idea of an impermeable animal/human boundary was upheld for a considerable period of time, despite mounting evidence to the contrary within some parts of the scientific community.

⁶²The FMD episode constitutes a set of events often neglected in the academic literature. Exceptions are Convery et al. (2005), Donaldson et al. (2002), Nerlich (2004), and Winter (2003), all of whom focus solely on the impact of FMD, from diverse perspectives such as rural sociology, social geography, and psychology.

When BSE was initially identified in the Weybridge Laboratories of the Central Veterinary Office in November 1986, human health concerns were not the first to be considered at issue. Rather, BSE was understood at the time to be a bovine variant of the sheep disease *scrapie*. The UK government was informed of the ‘new disease’ in June 1987, and by October of the same year, scientists at the Neuropathogenesis Unit (NPU) in Edinburgh concluded that BSE was a type of disease caused by the build-up of abnormal prion proteins in the brain and nervous system, a ‘prion disease’. In 1988, the government-commissioned *Southwood Committee* further concluded that the disease had been spread through animal feed. These insights, however, were only published in scientific journals and did not become part of the policy discourse on food (safety). Responsibility for food (safety) rested with the MAFF, which combined this task with representing the interests of the agricultural sector and the food production industry at large. It was this combination of responsibilities that was later felt to be inappropriate when BSE was found to pose a problem to *public* health, rather than merely animal health.

Whilst BSE was still primarily discussed in closed circles, a salmonella epidemic spread in 1988, later labeled the first ‘food scare’ in post-WWII times, and food (safety) emerged on the political agenda, as noted in section 4.2 (Smith 1991; cf. Roslyng 2005). Equally, the outbreak of *Salmonella typhimurium* in a hospital in Stanley Royd played a significant part in the setting up of the *Acheson Review* of the public health function in the United Kingdom (Kisely and Jones 1997; Kapila and Buttery 1986). In late 1988, when BSE was categorized as a *zoonosis* (an animal disease transmissible to humans), a range of measures were implemented, possibly partly in response to the pressure created by the salmonella affair. Certain cattle offal was banned for human consumption, the EU banned UK imports of live cattle aged over six months, the Spongiform Encephalopathy Advisory Committee (SEAC) was set up, and last but not least, the MAFF food safety division set up a regular series of Consumer Panels which were to discuss, amongst other things, BSE. In 1990, the Food Safety Act was approved, which – again possibly in response to the salmonella events – promised that ‘no compromise on food safety’ and ‘no coziness with vested interests’ would mark this new phase of food (safety) policy (MAFF 1989; cited in Millstone and van Zwanenberg 2005: 66). The Act, however, was primarily intended to give ministers more formal power to put in place regulations and did not fundamentally restructure the food (safety) policy regime. As a result it was criticized by many for its lack of force (cf. Millstone and van Zwanenberg 2005: 66-7).

Roughly during the same time period, BSE repeatedly appeared in the media. The BBC (British Broadcasting Corporation) *Food Programme*, which continues to exist today, broadcast scientific discussions that were being led at the time that called for a closer look at the possibility

of BSE spreading to humans (EN9-J). The program was not well-received by authorities such as the Chief Veterinarian, however, as the dominant notion of scientific expertise at the time still implied that ‘the lay public does not understand science’, as a journalist respondent recounts (EN9-J). The TV program ‘The Trouble with Vera’ showed footage of a ‘mad cow’, farmers’ magazines described the phenomenon as a ‘mystery disease’, and some media outlets, for example the British Channel 4 and the *Guardian* newspaper, occasionally approached scientists to speak or write publicly about the scientific disputes around BSE. In 1992, the suspicion that ‘mad cow disease’ may constitute a threat to public health was turned into a BBC TV drama series, titled ‘Natural Lies’. Despite these attempts by individual journalists to open up a public discussion on BSE and food (safety) issues more generally, overall, the governmental handling of the newly emerging disease remained shaped by the hegemonic discursive notion that ‘scientific experts knew best’. A symptom of this notion consisted in the policy culture of secrecy and insufficient transparency, which were to be heavily criticized only in the late 1990s, as we shall in detail in section 4.4.

Evidence for the possibility of transmission of BSE to pigs and cats (‘Mad Max’) made for major news headlines in 1990, yet controversies in scientific research concerning BSE continued throughout the early 1990s, alongside rising incidence rates of BSE in Britain. As early as 1988, two scientists had warned in the renowned *British Medical Journal* that the denial of a link between BSE and CJD was ‘naive, uninformed, and potentially disastrous’ (Holt and Phillips 1988). Richard Lacey, a prominent scientist, felt that the Food Safety Act would have no impact on BSE-related policy and reasserted his estimate that there was a probability of 60% that ‘human cases of BSE’ would emerge by 1996 (Millstone and van Zwanenberg 2005: 67). Two scientists, Stephen Dealler and Will Patterson, had been carrying out calculations of the number of infected cattle that had entered the food chain. The widely-read *Daily Telegraph* reported their conclusion that these totaled 1.5 million, in an article titled ‘Most beef eaten already exposed to mad cow agent’ (Fletcher/*Daily Telegraph* 1995). Gradually, the so-called ‘prion-hypothesis’, which saw a link between MBM as cattle feed and the build-up of abnormal prion proteins, seemed to gain firm ground.

On 1 December 1995, Sir Bernard Tomlinson, a professor of pathology at Newcastle University, announced in a radio interview that he would no longer eat beef burgers (Wales 2004: 34ff). On the other hand, alternative hypotheses on the causes of BSE held some ground as well, such as the organophosphate theory defended by David Ray and Mark Purdey (BBC2 2001; Purdey 1994) (see chapter one, section 1.2.2), and received attention in the media long after the UK and the EU approach to BSE had been institutionalized: In 2001, a BBC reporter,

Edward Stourton, presented Purdey as follows: ‘For nearly two decades Mark Purdey has been dismissed as a maverick [...] [but] he could soon be hailed as a visionary’ (BBC2 2001: 00:51).

Until 1995, government officials – with the apparent backing of scientific experts within the MAFF – maintained that British beef was entirely safe to eat. A key enactment of this stance was observed in May 1990, when John Gummer, then Minister for Agriculture, shared a hamburger with his daughter in front of British press. Some six years later, on 20 March 1996, the Health Secretary at the time, Stephen Dorrel, was forced to announce that there was a possible link between BSE and nvCJD (see chapter one, section 1.3). The announcement marked the beginning of a wide range of developments. Beef consumption dropped considerably, even if only temporarily, in the UK and elsewhere. Policymakers and scientists were faced with what was believed to be a drastic loss of public trust (Oosterveer 2002; Poppe and Kjaernes 2003; Wales 2004). On the level of the EU, a prohibition of exports from the UK was installed (Decision COM 96/293/EC), which included bovine animals, their semen and embryos, meat of bovine animals slaughtered in the UK that may have entered the animal feed production chain or the human food chain, materials intended for use in medicinal products, cosmetics or pharmaceutical products, and, last but not least, MBM derived from mammals (Philips, Bridgeman et al. 1998 Vol. 16:1). The next section presents the institutional responses in the immediate aftermath of the discovery.

4.3.2 BSE and initial institutional interventions

In response to public outrage, Tony Blair, leader of the opposition at the time, invited Professor Philip James of the Rowett Research Institute in Aberdeen to produce a report containing recommendations concerning the possible structure and functions of a Food Standards Agency. The formation of a Food Standards Agency became a Labour Party manifesto commitment, and the so-called ‘James Report’ set out the requirements for the establishment of an agency concerned with the protection of consumer health and food (safety) if the Labour Party would come to office after the coming elections – which it did in May 1997.

The James Report (1997) further recommended a commitment to ‘putting the consumer first’, ‘openness’, and ‘transparency’ in the policymaking process. In order for the government to regain public trust, the Report stated, it would be necessary to institute ‘substantial structural and cultural change’ (James 1997: part I). Central to this change would be to set public health and consumer protection as a first priority and to remove food safety policy from ‘political pressure and interference from vested interests’ (James 1997: Part II), whereby he referred to farmers, particularly the institution of the NFU and the food and agricultural industry. Citizen groups, for

instance the Consumer Association, also vehemently called for a new independent agency with a responsibility for food and with a more ‘consumer-centered approach’ (James 1997: appendix IV; Consumer Association 1996). As mentioned earlier, these concerns – regarding the influence of producers as undermining consumer protection – had previously been voiced already at certain historical junctures both towards the end of the 19th century and in the 1980s (see section 4.2.3). It was the events around BSE, however, that made it possible for this discourse to re-emerge.

A second investigation, the ‘BSE Inquiry’, was set up under the auspices of Lord Philips on 12 January 1998 in order to

establish and review the history of the emergence and identification of BSE and new variant CJD in the United Kingdom, and of the action taken in response to it up to 20 March 1996; and to reach conclusions on the adequacy of that response, taking into account the state of knowledge at the time (Philips, Bridgeman and Ferguson-Smith 1998, Vol I, page unknown).

The extensive report was produced by means of reviewing evidence such as scientific reports, written personal communications, parliamentary minutes, and press material. Completed in 2000, the BSE Inquiry Report (also known as the Philips Report) stated that ‘[t]hroughout the BSE story, the [government’s] approach to communication of risk was shaped by a consuming fear of provoking an *irrational* public scare’ (Philips, Bridgeman et al. 1998: Vol. 1, chapter 14, par. 1294, emphasis added). It concluded that (1) risk communication and consumer information had been unsatisfactory in their manner and timing, (2) communication and coordination between the various bodies involved in the BSE story (the two scientific committees, Southwood Working Party and SEAC, and the various governmental institutions, such as the MAFF and the Department of Health) had been flawed, and that (3) the advisory committees regarding the BSE problem had at times been ‘used inappropriately’, resulting in critical time delays of policy decisions. In contrast to the James Report, however, the BSE Inquiry posited that ‘in dealing with BSE, it was not the MAFF’s policy to lean in favor of the agricultural producers to the detriment of the consumer’ (Philips, Bridgeman et al.: Vol. 1, executive summary).

Both the James Report and the BSE Inquiry pointed to the pressing issue of drastically declining public trust in government and in science and concluded a need for ‘openness and

transparency' in order to overcome what they suggested to be a 'crisis'.⁶³ The introduction of the notion of trust into policy (as well as academic discourse, see chapter two) suggests that policymakers constructed a differentiation between what the 'public' 'used to be', and what it *should* be, and it suggests a rethinking of the rules, roles, and responsibilities among the different parties involved in the policymaking process in the face of the experienced institutional ambiguity. As the perceived problem of trust, however, did not only affect public officials, but also the farming industry and retailers, the notion of trust also led to a blurring of the constructed division between the roles and responsibilities of these seemingly disparate actors.

The aforementioned James Report resulted in the White Paper *The Food Standards Agency: A Force for Change* (1998) that addressed three key factors: (1) the potential conflict of interest resulting from the MAFF's dual responsibility for food (i.e. that of promoting the commercial interests of the agricultural industry as well as ensuring food safety for the consumer); (2) the fragmentation and lack of coordination between the various government bodies charged with food (safety) policy; and (3) the unsatisfactory, uneven implementation of food law (MAFF 1998; Wales 2004). Following a period of public consultation on the White Paper, the FSA was installed, the staff of which was composed to two-thirds of former MAFF officials and to one third of former Department of Health officials.⁶⁴

The James Report of 1997 was not framed in terms of a 'risk assessment' and 'risk management' vocabulary, and the White Paper (1998) similarly avoided 'decisionist' terminologies of 'risk assessment' ('science') as separate from 'risk management' ('policy') as the basis for reforming the food (safety) policy infrastructure (from MAFF to FSA and DEFRA; see section 4.3.4 below). Instead, it sketched an image of an independent, 'hybrid science-based policy advisory' food (safety) authority (Millstone and Van Zwanenberg 2005: 212-4) that was to 'put the consumer first'. With the two reports and the resultant White Paper, new notions of 'good policymaking' were called into being: Not only did the committees concern themselves with the boundaries between science and policy, but they also (re-)introduced the discursive elements of consumer protection and consumer rights into the policy concept of 'food safety' which had only occupied a relatively marginal role in England's post-war food (safety) policy discourse.

⁶³Next to these two paramount reports, the Chief Scientific Advisor at the time, Sir Robert May, was commissioned to produce a report with the aim of reviewing and improving the approach taken by advisory committees dealing with food (safety). The conclusions were published in July 2000 and were very similar to those in the Philips Report.

⁶⁴The FSA is a UK body but has separate branches in Wales, Scotland, and Northern Ireland. This study is based on documents of the central FSA in London and interviews with officials there.

Between the advice issued in the James Report and the actual establishment of the FSA, the Agency was reshaped in certain aspects from an advisory body into a more policy-oriented agency (ibid; Loeber and Paul 2005). For instance, while James had envisaged the FSA's responsibilities to be based on the 'food chain' principle – reaching from 'farm to fork', the authors of the White Paper proposed that the MAFF should retain responsibilities for farm-related processes (including pesticides, veterinary issues, genetically modified foods, and BSE), whereas the FSA should be tasked with regulatory action related to food once it leaves the farm. This proposal was interpreted by some as counter-productive and as an inadequate response to the BSE episode; others perceived it to be a punishment to the MAFF (Millstone and van Zwanenberg 2005: 215). Such differences in interpretation indicate that particular performative acts can be read in diverse ways by the 'audience'.

When the FSA was formally inaugurated in 2000, its first Chair, John Krebs, was an Oxford scientist. This appointment is interesting in two ways: First, it reflected and re-produced the FSA's pledge to 'scientific excellence'; second, having an Oxford scientist as its head, rather than a politician or a farmer, provided the FSA with a particular organizational identity and represented an enactment of the signaling of a shift in policy practices. The FSA was charged with a wide remit: the protection of public health (a mandate shared with the Department of Health); the provision of advice and information; the oversight of effective and consistent food law enforcement; the coordination of research and development, as well as surveillance; and the development of policy and representation in the context of the EU.

As we shall see later in this chapter, the FSA's initial remit concerning the relation between public health and food (safety) was to expand and change in the years to come. Before addressing these developments in more detail - and in order to understand them better – the section below gives an account of yet another crisis that hit England at a time when food (safety) policy was only just in the process of recovery from the institutional ambiguity experienced through BSE.

4.3.3 The meaning of FMD and continuing institutional rearrangements

In late 2000 and early 2001, another 'crisis' (as it is commonly referred to in academic scholarship as well as in the media and by interview respondents) struck England: the outbreak FMD. It is important to note that FMD normally does not constitute a threat to food *safety*, whereas the disease has detrimental effects on animal health and for the livestock industry, and causes significant loss of productivity. Yet this study is not concerned with revealing 'what BSE and FMD *really are*' but, rather, with what is *made* of them.

To some observers, the FMD epidemic ‘focused attention like never before on farming and fears of a genuine and continuing crisis in the countryside’ (BBC 2001). The spread of the disease had a knock-on impact on the tourism sector, which is economically more important than agriculture in the UK (Winter 2003: 50) but depends on the conditions that agriculture provides. The insufficient resources the government made available initially to control the spread of the disease were later seen as yet another government failure, referring to the recent BSE episode. In consideration of this ineffective handling of the epidemic, it is interesting to note that the country had experienced an FMD epidemic in 1967. The ‘lessons learned’ from that earlier epidemic were summarized in a document for the MAFF, and as the Chief Scientific Advisor puts it, ‘dusted [...] over and applied [...] immediately in 2001’ (House of Commons 2006: question 105). Given the considerable changes the farming system had undergone since 1967, the crisis was not only of an administrative nature, but constituted a *discursive* mismatch and hence posed a dislocatory moment for both policymakers and farmers. Livestock was now being sent from one farm to another through its lifetime, and the animal movements around the country had changed ‘dramatically’ (ibid.). In other words, the ‘reality’ of FMD in 2001 did not fit into the realities produced in the 1967 MAFF report.

Efforts to control the disease included a closing off of public walking trails in the countryside, which, given the English fondness for the outdoors, provoked strong sentiments. Keith Thomas (1983) gives a refined account of the changing perceptions of and values associated with the countryside and landscapes, in particular, in England. With respect to the 18th century, for instance, he remarks that ‘it was the English who went furthest towards [...] the ‘divinisation of nature’ (Thomas 1983: 261). Of specific pertinence here are his accounts of the changes and continuities herein, in which much of the changes constituted responses to the dislocatory effects of agricultural advances and changing uses of landscapes (although Thomas does not use this conceptual language). While Thomas’ account only stretches until 1900, his analysis is relevant here, as the early agricultural progress in England sets this case apart from countries in continental Europe.

In a more recent discussion of the implications of the FMD epidemic, Ian Convery et al. (2005: 107) observe that ‘through familiar fields and woodlands, roads and paths, people create a sense of self and belonging’. One could argue that, when these resources of identification became disrupted and literally closed off, the concept of farming itself became dislocated, destabilized, and open to redefinition. The following quotes are indicative of such a broad, societal impact and point to the experience of FMD as a societal dislocatory experience, rather than merely an economic crisis: ‘What is happening in farming and the food industry in England

today [because of FMD] raises questions for all of us: as consumers; as residents in or visitors to the countryside; as taxpayers; as those engaged in the production and processing of food' (Policy Commission 2001: 2). In a similar fashion, the head of DEFRA installed in 2006, Sir David Miliband, announced:

I've learnt that farming is at the heart of our society, our economy and our cultural heritage. It's about people, food, landscape and the environment. It touches every member of society every day. [...] [F]arming is important not just for the countryside but for the whole country (Miliband 2006).

To conclude, the outbreak of FMD in 2000/1 cannot merely be framed as an economic crisis as a result of which the different actors in the policy process had to re-negotiate their interests. Rather, the interpretation of the disease and its significance hinged upon the specific discursive context in which it occurred, where the experience of BSE played a crucial role in shaping the interpretation of FMD as an instance of crisis.

In the face of the series of dislocations experienced through the two epidemics discussed above, as well as the resultant institutional ambiguity, the responsible policymakers, officials, and scientists drew on institutionalized practices and standard operating procedures – such as installing committees and commissioning reports - in order to reinstitute their credibility, authority, and legitimacy. In this sub-section, reports and evaluations are not merely read as conventional policy practices. Rather, I consider the practices of setting up committees publicly, publishing reports, and commissioning research as *performative* practices (cf. Hilgartner 2000), as they mobilize particular sets of meanings and introduce particular understanding of objects and subjects.

As advised in the aforementioned White Paper, the MAFF was replaced by the Department of Environmental, Rural Affairs and Food (hereafter DEFRA) in 2001, based on a commitment that the Labour Party had made in its 1997 election manifesto. The institutional rearrangements generated by the FMD crisis can therefore not be seen as separate from those following the BSE crisis. Pointing to the disruption of the previously sedimented policy discourse, the DEFRA took over all responsibilities of the MAFF, and some of the 'green' policy responsibilities from the previous Department of the Environment, Transport, and the Regions. Given the post-war history of the MAFF and its related identity as having improved the nation's food supply after the war (see section 4.2), yet, on the other hand, its troubled reputation after salmonella, BSE, and FMD, the dissolution of the institution was at once traumatic and liberating:

[W]e [FSA and DEFRA] were setting up with a new culture; the openness, the independence, it was a brand new organization, nobody was being taken over, and

I think that was a very positive development... [p]lus the fact that from the Ministry of Agriculture point of view, it had had so many challenges through BSE and other food safety issues. In other words, all the issues that led to the establishment of the agency meant that you almost didn't want to see the name Ministry of Agriculture in the newspaper; you almost knew it was going to be a bad thing (EN1-G).

Then, in August 2001, the *Policy Commission on the Future of Farming and Food* was set up (with a remit solely for England), chaired by Sir Don Curry, a farmer and former member of the Meat and Livestock Commission. Its purpose was to 'advise the Government on how we can create a sustainable, competitive and diverse farming and food sector' (Policy Commission 2001: 2). In relation to the tasks of the Commission, a senior policy official working in the Countryside Agency's (renamed Natural England in 2006)⁶⁵ policy program *Eat the View*, which seeks to 'reconnect' consumers to food and farming, illustrates well how the related sets of dislocations experienced at the time facilitated the re-emergence of previously marginal, or latent, issues. FMD, he remarks,

brought to the head a lot of issues that had been left for quite some time. *It's not as if they became issues; they'd been there for ages.* I think it was a definite point at which the industry stopped still. It was a *crisis and so it was an ideal time for reflection* (EN4-G, emphasis added).

Similarly, the Cabinet recognized in the Commission's consultation document that

[e]ven before the current outbreak of Foot and Mouth, many of those involved with food production in this country were saying that their industry was facing crisis [in relation to] major perceived problems of animal health, food safety, and the nutritional quality of food; of environmental degradation; and of continued decline in wildlife diversity in the countryside (Policy Commission 2001:2)

The two quotations indicate that a sense of decline, if not crisis, of environmental sustainability was already present before the FMD epidemic, and most likely before the BSE crisis, too, as the historical discussion in section 2 suggested. The discursive construction of the meaning of the FMD outbreak was therefore shaped by the earlier experience of BSE.

⁶⁵ The Countryside Agency has been in existence since 1909, although it was then the Development Commission (1909-1988), and subsequently the Rural Development Commission (1988-1999), the National Parks Commission (1949-1968), and the Countryside Commission (1968-1999) (see Cox 1988). More recently (in 2006/7), the Countryside Agency was again transformed into Natural England, which functions as a Non-departmental public body (NDPD) under DEFRA.

The shared understanding that the two epidemics constituted instances of crisis and that ‘something had to be done’ found expression in the broad membership composition of the Curry Policy Commission, which included consumer advocates, animal welfare campaigners, members of the food industry, and environmentalist NGOs (Policy Commission 2001: 4, 2002; DEFRA 2002c; for consultation responses see DEFRA 2001: 143ff).⁶⁶ The range of members indicates the relative openness of the definition of food (safety) and food quality at the time, even though the parties were officially appointed based on their personal background and expertise, and not as representatives of a particular organization. The discursive inclusiveness of the proposal helps explain why the government decided to accept the Commission’s recommendations almost in their entirety and eventually produced the *Strategy for Sustainable Farming and Food: Facing the Future in England* (SSFF), which was established in December 2002 (see DEFRA 2000a, 2000b; DEFRA 2008b) and continues to be an important point of reference for officials working in this area.

To sum up, this section gave an account of the twin-epidemics of BSE and FMD and the institutional interventions that followed. It showed, first, that the two diseases were not taken up in a discursive vacuum, but that they raised concerns that had previously been at the margins of the debate. Second, the section demonstrated the dislocatory effects of the epidemics regarding the previously hegemonic, established policy practices: The events around BSE and FMD could not be fully grasped and interpreted by holding on to the formerly hegemonic vantage points of maximizing productivity, intensive farming, and food security (rather than food *safety* or *quality*); nor could the issue be grasped and dealt with within the institutionalized working practices of scientific experts. Following this historical sketch, section 4 below is devoted to the discourse analysis of contemporary English food (safety) policy, while keeping in mind the discursive formations traced in section 2 and the moments of transformation identified in section 3.

4.4 Change and continuity in food (safety) policy discourse in England

Attentive to our findings of the foregoing sections, this section presents the collection of the discourses that inform food (safety) policy in England, their context-specific content, which is captured through the concept of notions here, and the particular discursive clusters of practices those have produced. Beyond the discussion of the composition of the five inductively derived individual discourses, I also highlight their interlinkages at a broader discursive level, that is, how

⁶⁶ The National Consumer Council (NCC), the Royal Society for the Protection of Birds (arguably the most influential lobby group in the UK), the Soil Association, the National Trust (an environmentalist charity), British Telecom (BT), a former member of the Bank of England’s Monetary Policy Committee, Sainsbury’s, and Unilever.

the rival discourses produce an overall recognizable policy discourse. The discourses, their key notions, as well as the discursive clusters where we find a blurring of roles and identities between policymakers, scientists, members of the industry, and citizens, are summarized in table 4.1 at the end of this chapter.

4.4.1 Good Governance

Chapter three proposed to explore signs of institutional ambiguity as symptomatic of dislocations that necessitate (and indeed facilitate) the redefinition of roles, identities, rules, and responsibilities. The discourse of good governance has played a particular role in the effort to achieve discursive closure at such historical junctures. The composition of this discourse in England, as it appears summarized in table 4.1 in the far left column, includes the following notions to be discussed here in turn: the notion of the independence of scientific experts and policymakers from the agricultural lobby and a related, new notion of what ‘good science’ is; the need for openness and transparency in the policy process; the notion of the need to enhance and sustain consumer trust by being open towards the consumer and putting her interests before those of the industry; the notion of the competent layperson as a participant in the policymaking process; the notion of the consumer as a stakeholder with choices and rights; and the notion that all actors that form links in the food chain should work together for the sake of good food (safety) governance. The latter two notions, however, will be discussed more specifically in the presentation of the consumer protection discourse.

In the aftermath of BSE, as suggested above, criticism directed at scientific experts and their roles in allegedly holding back scientific discoveries with respect to a possible link between BSE and nvCJD marked the initial reactions. Consumer advocates charged experts with being too involved with ‘political interests’, more precisely, the policymakers at the MAFF. As a consequence, what I have referred to as the ‘science/policy nexus’ (see chapter two, section 2.4) came to be scrutinized, called into question, and, eventually, reconstructed.

As I recounted in the previous section, in a key moment of transformation, the Philips report appealed to this science/policy nexus and introduced the notion of a need for a removal of the influence of the food industry from food (safety) policymaking in order to ensure independence on the part of policymakers and scientific experts. Good governance then came to mean working independently of political and industrial interests and working for the consumer. These notions found expression in the disbandment of the MAFF and the establishment of DEFRA and the FSA, whose slogans came to be ‘putting the consumer first’, ‘excellence’, and

‘transparency.’ A scientist respondent at the FSA, who is in charge of developing science policy, experienced the introduction of these notions as follows:

T]he shift to the Food Standards Agency [...] was a huge cultural change. I’m working in an official culture of openness. [...] It was a very different way of working [...] and we weren’t quite sure what our status was going to be, and then you’re new and there are high expectations and you’re worried about, quite legitimately, about how it was going to work out. Because it was a very different approach and quite novel and risky [...] - being open about things (EN3-G).

Keeping in mind the dislocatory effect of the BSE crisis, it is instructive to note that even ten years after the discovery of BSE, the science/policy nexus continues to be problematized and rethought. This is illustrated in the following lengthy quotation of Sir David King in his appointed position of Chief Scientific Advisor:

[Partly] as a result of the BSE crisis, followed by foot-and-mouth disease [...], the position of the science advisory system within government had fallen in terms of public confidence, and so when I came into government the first documents I read were the Phillips Commission report into the BSE crisis, and it became absolutely clear to me that the Chief Scientific Adviser needed to establish that the science advice that was given was independent advice. The politicians can then make decisions on the basis of that advice, and they may choose to ignore it, but the advice system should be independent of the political flavour of the moment. [...] The advice is put into to public domain after it has been put into the political system so that there is always that cross-check. Now, I think the phrase ‘independent science advice’ is contained in that description—that the science advice should not be driven by political convenience (House of Commons 2006, King question 61).

The quotation above indicates the impact of BSE on policymaking regarding the science/policy nexus as well as the discursive significance of the report mentioned. While, as we shall see later, the notion of independence as ‘good governance’ is a common theme across the studied contexts, it appears that even this kind of ‘neutral’ notion can be interpreted in diverse ways. Contrary to practices in Germany and the Netherlands, the notion of independence in the UK context has not entailed an institutional separation of risk assessment (‘science’) and risk management (‘policy’), as is envisaged in the three-stage model of risk analysis (see chapter two). Instead, an institutional fusion of risk assessment and risk management was established in the

form of the FSA. The former Chair of the FSA distinguishes between ‘old’ and ‘novel’ practices, as follows:

The old risk analysis model was linear in that assessment, management and communication were separate. [...]. When you’re an organisation like the FSA, which operates in public, you cannot keep the three strands distinct. They become intertwined. This non-linear approach to risk analysis is what makes the FSA different from earlier Government approaches to risk, which only informed the public once all the facts were known. The approach was to say, ‘We don’t know enough to tell people, so we’ll keep quiet about it’ (FSA 2001c: 5).

What is interesting here is the distinction between old and new ways of working in the discourse of good governance, that is, a performative appeal to a shift in practice. An analysis of interviews with scientists at the FSA (but see also FSA 2005, 2006b) indicates that this shift in discourse has also had a ‘liberating effect’. Rather than being put in a ‘scientist’s straightjacket’, taking on the perspective of consumer protection, sustainability, but also that of the industry allows for more improvisation and flexibility in the roles of scientists and policymakers – whereby, in fact, the strict functional differentiation between the actor-categories becomes blurred. The Chief Scientist points to the loosening of the three-stage model of risk analysis and the elasticity of the category of ‘evidence’:

When we develop advice and make policies - the risk management part of the business - the Agency takes into account a far wider evidence base (individual liberty, regulatory constraints, economic and social consequences and consumers’ appetite for risk). This second stage is distinct from the scientific process of advocacy and challenge that generates the risk assessment; it’s an iterative, consultative process which leads to our Board reaching and making a judgment accountably and in public (FSA-Blog 2007b).

Whilst the separation between farming and food (safety) policy through the disbandment of the MAFF was led by and reproduced the notion of independent scientific expertise, the notion of a good science/policy nexus is currently developing into a broader notion of ‘good science’. In the 2006 *Science and Technology Committee* report (at the House of Commons), titled *Scientific Advice, Risk and Evidence Based Policy Making* ([HC 900-I] (House of Commons 2006), the domain of food (safety), and more specifically the FSA, received remarkably positive attention; the latter is frequently referred to as ‘innovative’ or an example of ‘best practice’ (House of Commons 2006: 32). Regarding scientific expertise, the inquiry remarked that around 40% of FSA staff has scientific qualifications and that

the FSA seemed proud that many of its staff are recognized internationally as experts in their fields. The FSA told us that it sought to ‘develop the skills and knowledge of our scientific staff by encouraging them to attend or present papers to appropriate conferences or workshops so that their expertise is kept up-to-date and recognised by the scientific community’ (House of Commons 2006: 32).

Beyond these formal qualifications, which speak to a notion of ‘good science’ as one that is performed in a ‘professional’ way, good scientists must now be fluent in a vocabulary beyond their expertise. In the science *blog* at the FSA, for instance, the Chief Scientist, Andrew Wadge, reports on his meetings, insights, and thoughts on new research results ‘to show the importance of good science and how we use it to inform FSA policies and advice [...] to let you know what I and my scientist colleagues at the Agency are up to, what the emerging issues are, and how we propose handling them’ (FSA Blog 2006). By addressing consumers in such a way, a virtual audience is invoked and this very audience becomes constitutive of the discourse of good governance, as will become clearer in section 4.4.2. The choice of categories discussed in the context of the *blog* further suggests the institutionalization of particular discourses and the blurring of the science/policy/citizen distinctions: *Food fraud*, *General interest*, *New initiatives*, *Out and about*, *Science, safety and health*, *Science in Government*, and *Supporting consumer choice* (FSA Blog 2006; cf. FSA Blog 2007b).

These categories are not neutral or naturally given, but are constructed, reproduced, and enacted in everyday policy practice – in the composition of committees, in the publication of reports, in newsletters announcing product withdrawals, and in nutrition advice. New discourses have entered into the science/policy nexus, in particular, public health and consumer protection, as we shall see in more detail below. As far as this apparent opening of the notion of scientific expertise is concerned, it is further worth highlighting the importance of the use of social science in the FSA’s mode of operation (cf. FSA 2005). Notably, the social science unit at the FSA is situated not within the consumer unit but in the science department. This suggests that the social sciences are seen as integral to food safety policy, rather than as external input for policy.

The discourse of good governance also expresses itself in the twin-notions of ‘openness’ and ‘transparency’.⁶⁷ To begin with, the public availability of documents (including scientific assessments) is constantly stressed, and elements of dissent are also recorded in the minutes of meetings. The FSA regularly publishes meeting schedules (‘who said what’) online in the name

⁶⁷ The notions of transparency and openness are not limited to the policy domain of food safety. In addition, they are institutionalized in the *Better Regulation Act*, the *Environmental Information Act*, the *Freedom of Information Act*, and the *White Paper on Governance* (including the equivalent EU document of the same title).

of ‘openness and transparency’. Details of meetings held and attended by the Chief Executive and Directors are published on a monthly basis, including dates, those who attended the meeting, and the purpose behind it. In a similar fashion, the notion of openness is enacted when the FSA makes details available regarding engagements of Board Members, and declarations of interests were introduced earlier in the English policy setting than in the other cases studied for the purpose of this thesis – for instance, in EU institutions (cf. Millstone and Zwanenberg 2002: 595-7). Moreover, open-plan offices have become widespread in this context. While the practice probably originated in the industry, the ways in which civil servant respondents in this study referred to their work setting indicates the importance of this spatial arrangement for their self-understandings.

Informed by the discourse of good governance, the FSA has moreover been keen to involve ‘laypeople’ in scientific meetings and to invite consumer organizations onto industry committees, which function as informal vehicles for communication between industry stakeholders, policymakers, and scientists. While this notion is certainly related to the notion of putting ‘consumer interests’ before those of the industry, it also relies on the notion of the consumer being a stakeholder within the food chain. Within the food chain concept, scientists and policymakers come to be in a relational positioning vis-à-vis ‘the consumer’. In turn, this mutual positioning and the notion that everyone has a stake in and responsibility for keeping food safe leads to a blurring of boundaries between the commonly assumed categories of ‘the scientist’, ‘the policymaker’, ‘member of the industry’, and ‘the citizen’. I shall discuss the linkage between the notion of holding a stake and being a consumer more specifically in subsection 4.4.2.

Next to the formal participation of citizen groups in the policy process, the position of the layperson either as an active participant or as a ‘neutral observer’ gives expression to the notion that the layperson has ‘policy competence’ and that her participation in the policymaking process is beneficial. In these concrete spaces and settings, competent laypeople function to engage the other policy participants in a relational position, and it becomes possible for policymakers to develop and rehearse routines that underlie their self-understandings as ‘policymakers’, as ‘scientists’, and so forth.⁶⁸

While discursive notions such as those of openness and transparency contribute to the temporary fixation of the meanings of food (safety) and good food (safety) governance, these notions are contingent, constantly rehearsed, improvised, tested on different audiences, and

⁶⁸ More recently, in December 2007 a General Advisory Committee on Science (GACS) was established within the FSA, which is to provide independent advice on the Agency’s production and use of science. The Committee comprises an independent Chair, four independent expert members, as well as two lay members.

enacted in particular organizational practices. Food (safety) policy in England offers literal examples of this performative dimension of policymaking: The FSA holds Open Board Meetings that are also broadcast online and additionally available as *podcasts*. Besides, the FSA Board travels across the UK in order to increase visibility – its own, and that of the audience.⁶⁹ The discourse of good governance also functions as a discursive resource in the efforts of policymakers and scientists to reinvent their institutional image. A case in point would be the modification of the font in which documents are published - from Times New Roman (considered to be conservative) to Arial, which is viewed to be more accessible and ‘modern’ (EN3-S). The fact that the FSA invited volunteers to redesign the FSA website presents yet another noteworthy anecdote (FSA Press 2004).

In discursive linkage to the notions of openness and transparency discussed above we find the notion of ‘putting the consumer first’ and the notion that consumer trust is essential for the functioning of policy. Returning to the open board meetings mentioned above, I propose that settings of this kind also appeal to a relationship of mutual trust (cf. Hajer and Laws 2003). In other words, where a discourse of ‘good governance’ as open, transparent, and working for the consumer is invoked, the trusting, and competent layperson becomes constitutive of this discourse and embodied in the technology used.

The significance of the notions of ‘putting the consumer first’ and ‘consumer trust’ also manifests itself in the practice of ordering regular consumer perception and consumer trust surveys. While most food (safety) agencies in Europe conduct regular surveys regarding trust in food (safety), the FSA additionally commissions surveys concerning trust in the ability of the FSA to ensure food safety and consumer protection (rather than only food safety itself in technical terms). Regarding the notion of the need to enhance and sustain citizens’ trust in policymakers, scientists, and food (safety) more generally, respondents at the FSA observe that risk communication ‘works much better if we tell consumers immediately’ (EN2-G). In other words, scientists and policymakers understand openness about risks (‘good risk communication’) to be more likely to sustain trust than keeping potential risks secret.⁷⁰ In June of 2001, for

⁶⁹ This practice calls for ethnographic research that could capture instances of conflict such as during a recent open board meeting. Following a debate on artificial colourings, the British Soft Drinks Association raised the issue of criticizing third parties at Open Board Meetings ‘without producing evidence to substantiate that criticism’ (FSA 2007).

⁷⁰ The language of risk has also penetrated the work of NGOs and consumer advocates; frequently, consumer issues are framed in such terminology, whereas their language tends to be less technocratic than that of, for instance, FSA reports. See, for instance, the NCC Policy Briefing: The consumer view (2002); Involving Consumers in Food Policy; Winning the Risk Game (2003); as well as their general ‘Risk Project’, which studied the cases of food, financial services, and new technologies (2001-2003).

instance, in the uncertain case of the potential effects of dioxins released into the environment when carcasses were burnt during the FMD crisis, FSA Chairman John Krebs went on television and expressed concern about possible dioxin release and consequent residues in dairy, while at the same time emphasizing that research was underway, yet nothing was certain (cf. see FSA 2001c: 4). The following quote suggests, however, that practices which are frequently presented as ‘new thoughts’ or a ‘turnaround’ in policy styles were already present before the BSE crisis. An FSA respondent involved in consumer policy at the FSA describes her experience with these changing ‘openness’ practices as follows:

I didn’t realize before I came here that ‘safe’ didn’t mean no risk was involved. It means there’s a certain level of risk. We call that safe. I think the *language has changed*. Being a regulator, you have to understand more about risk and what people’s perceptions and attitudes are towards risks. So I’m sure *it’s always been there, but the way it’s being talked about has changed* (EN2-G, emphasis added; cf. FSA 2001a).

By including ‘people’s perceptions and attitudes’, as the FSA does, ‘good governance’ comes to mean ‘considering the consumer’, too. The injection of a ‘consumer perspective’ into scientific advice, however, as part of ‘good governance’, has not gone without friction. For instance, the aforementioned Science and Technology Committee’s inquiry remarked that ‘it remains to be seen whether there will be a conflict between sound science and a wish to put the *opinion* or the *confidence* of “the consumer first”’ (House of Commons 2006: 85, emphasis added; see also DEFRA 2006: 3). We shall further explore this tension in the next subsection.

To sum up, the good governance discourse has aided the attempts for discursive closure in the aftermath of the twin-epidemics of BSE and FMD. The practices discussed in this section, ranging from a science *blog* to particular physical work arrangements, point to the changing notions of what ‘good governance’ means and the particular significance of the notions of independence, transparency and openness as well as the notion of a competent and trusting citizen within the discourse of ‘good governance’. Building on these insights regarding the policy vocabulary in this context, I now move on to discuss the specific content of the consumer protection discourse in the English context; this will also allow us to recognize the linkages between the two discourses.

4.4.2 Consumer protection

Chapter two revealed that the concept of ‘the consumer’ and the different connotations associated with it has been one of the most central logics of contestation with respect to the impact of the series of food scares over the past decade. This discourse analysis of food (safety)

policy in England assigns a particularly important role to the discourse of consumer protection. This section discusses the composition of this discourse by explicating the following notions: the twin-notions that consumers must be put first in policymaking and that the food and farming industry must not be too prominent in policymaking; the notion that citizens' trust in food (safety), policymakers, and scientists is essential for the functioning of policy; the notion that their participation in the policymaking process is beneficial; and the notions that consumers as stakeholders within the food chain have rights and that they must be able to make informed choices, even though those may not be 'rational'. In principle, these notions are discussed in the sequence depicted in table 4.1, but at times, I will also highlight the ways in which some of them are discursively linked. Before I embark on presenting the discourse-analytical findings, a brief genealogy is in order for the purpose of better understanding the relative strength of the consumer protection discourse in England.

Following up on section 4.2.2, where I gave an initial account of the so-called 'new food movement' that has characterized the development of food (safety) policy in the English context in the 1980s, it is worth recalling that the criticism regarding the privileges of producers and farmers being put before the concerns of consumers never fully disappeared in the 20th century policy discourse. Rather, those voices were marginalized at times, particularly during WWII and the long-lasting food rationing program thereafter. At that time, the discourses of productionism and food security were still hegemonic, and it was not until the late 1950s and 1960s that the representation of citizens in an institutional context commenced (at the MAFF), as section 2 described.

Outside formal governmental institutions, a number of consumer advocacy associations were established, such as the Consumer Association (now *Which?*), which was founded in 1957. Not unlike the consumer movement in the US, the UK consumer movement had gained a comparatively strong foothold by the 1970s. In addition, the Margaret Thatcher government of the 1980s may also have left its imprints on the consumer movement; with its call for individualism and the language of 'choice', it produced a discourse based on the concept of consumers as choosing market agents.

The two major institutionalized consumer organizations, the NCC and *Which?*, came to share a particular consumer agenda that is certainly not limited to the policy field of food alone. The growth of umbrella organizations as well as particular alliances in the 1980s equally contributed to a shared agenda that merged discourses of consumer protection, environmental sustainability, and public health, such as the Maternity Alliance, the Green Alliance, and the Politics of Health Group (see section 4.2.3). The aforementioned salmonella affair provided additional momentum

to the growth of the movement (cf. Roslyng 2005, 2006). The collection of factors briefly recounted here was to facilitate the re-emergence of the consumer protection discourse with the experience of BSE.

After the announcement of the link between BSE and nvCJD, a series of moments of transformation followed, which induced a shift towards a *consumer* food (safety) policy beyond the conventional agricultural food policy. In response to the Philips Inquiry and the public outrage regarding the perceived influence of the industry in agricultural and food policymaking, the 1999 Food Standards Act announced that the UK government would seek to ‘protect public health from risks which may arise in connection with the consumption of food and otherwise protect the interests of consumers in relation to food’ (UK Cabinet 1999d: 1(2)). The subsequent institutional move of disbanding the MAFF and thereby removing the ‘smell of stables’ from food (safety) policy further reinforced this notion of a new policy era, in which the notion of ‘putting the consumer first’ was to replace the notion that food (safety) policy was a policy by and for farmers, with the primary aim of maximizing production, as the post-WWII hegemonic policy discourse had entailed.

The establishment of the Curry Commission, which was to debate the ‘future of food and farming’ in England, reinforced the FSA’s role as the institutional guardian of consumer protection and consumer rights. In order to be able to ‘inject’ the ‘consumer perspective’ into the Policy Commission, the FSA launched a widespread consultation among interested organizations (‘stakeholders’) and the interactive website ‘talkfood’ (FSA-talkfood (2001)). The FSA sought to reach ‘ordinary consumers’ – the competent layperson - rather than established organizations and consumer representatives, and therefore conducted a consumer opinion poll. Since then, the consumer protection discourse has become further institutionalized in the FSA organizational culture and has become a taken-for-granted concept in the self-understandings of many policymakers and scientists, and indeed across the discourses and the national contexts explored in this study. The usage of a wide range of consumer research as a basis for developing policies, for instance, indicates the institutionalization of the notion of a ‘knowledgeable consumer’ in food (safety) policymaking at the FSA.

Practices such as citizen forums in local contexts also appear to be distinctive compared to other food (safety) authorities in Europe, despite the general trend of establishing consumer committees in this policy area. A respondent involved in consumer research at the FSA explains that there has been a realization that it is crucial for government to *generate* and receive questions from the public, rather than seeking for *answers* only (EN2-G), as is practiced now in action-centered research. Likewise, in 2005, Demos, a leading think tank in the UK, was invited to

generate advice on what constitutes ‘effective engagement’ (Demos 2006). In their advice, Demos recommended:

Science can no longer rely upon unquestioned authority, it must be judged according to a broader set of questions [...] It is increasingly accepted within debates about science and society that people’s knowledge, experience and values can provide valuable insights, both in terms of framing issues and questions, and in assessing and evaluating solutions (DEMOS 2006: 4, 7).

In response, the FSA reformulated its approach regarding consumer protection, whereby the meaning of good consumer protection moved from merely ‘consulting’ citizens to mobilizing an active audience:

We shouldn’t think of public engagement as another form of *evidence*, because by calling it another form of evidence, it makes it quite limited. In actual fact we should see it as wider and different to that. We shouldn’t speak to the public just to seek answers to the questions we pose. In actual fact, good public engagement should be about the public asking questions about our questions, then the public would also make connections about what we are saying (EN2-G; cf. FSA 2004a).

The above quotations indicate ways in which policymakers have tried to reconstruct and redefine their own self-understandings by means of reconstructing their ‘audience’. The policy process is iterative, continuous, and entails an *active* and *interactive* search for the adequate roles, responsibilities, and general ‘rules of the game’ in this policy context. Beyond this, I propose that the reversal of sedimented roles between ‘the policymaker’, the omniscient expert, and what was previously constructed as a passive ‘audience’ produces and reflects a sense of agency on behalf of ‘the public’: The fact that the generation of questions (rather than responses to given questions) forms such an important part of the policymaking process implies that, on these new institutional stages, policymaking is multi-directional and dynamic. In this manner, the categories of ‘actors’ (policymakers, scientists) and ‘audience’ (citizens) are exposed as mutually constitutive.

This iterative process can also entail new categorizations, or the appeal to new identities and subject positions. In the discourse of consumer protection and its amalgamation with the discourse of good governance, the citizen becomes a ‘consumer’ and (some) consumers become ‘stakeholders’. The FSA differentiates between ‘individual consumers’, ‘consumer stakeholders’, and the ‘hard-to reach, disenfranchised, socially excluded, seldom-heard voices, the voiceless’

(EN2-G). An FSA respondent, who works in the area of consumer research, explains this process well:

People are talking about different things. Some people are talking about stakeholders but we were talking about members of public. So the conversations and the debate were sometimes quite confused. So what we then did was think about this new model for engagement; how were we as an agency going to engage with consumers? When we started we said: we need to really break down what we mean by consumers (EN2-G, emphasis added).

The desire on the part of policymakers to define ‘the consumer’ speaks to the lasting institutional ambiguity experienced on a new institutional stage. In the effort to reconstruct a ‘target audience’, the notion of the consumer as a ‘stakeholder’ is invoked. The discursive power of the notion of being a stakeholder lies in its empowering connotation and the flexibility of the term, in the sense that seemingly disparate actors may come to identify themselves with it. As such, a sense of *stakeholderness* has also contributed to discursive clusters where members of the industry, policymakers, and citizens come to cooperate, such as in promoting the consumption of ‘healthy food’, as we shall see further below in the discussion of the public health discourse.

Some would argue that the notion of being a stakeholder creates a sense of individualism and may hinder the development of a sense of collectiveness. However, in the current neoliberal discourse, the notion of the stakeholder is actively differentiated from the notion of being a shareholder: While the latter terms only denotes financial interests, ‘holding a stake’ can denote a variety of interests and concerns beyond those financial in nature, ranging from working conditions to ecologically sound production. In the relative bracketing out of the need to maximize profit, food (safety) can be discursively presented as a ‘non-competitive’ issue. Precisely because everyone can identify as a stakeholder (who would *not* want food to be safe?), *stakeholderness* has become a shared understanding and a basis for cooperation across institutional, national, and professional boundaries. We shall see this discursive mechanism return in the other empirical chapters.

The institutionalization of the notion of a competent layperson-consumer whose participation in policymaking is not only necessary (as a stakeholder) but also beneficial (as a competent layperson) began in 2000, when the FSA Board installed an internal Consumer Branch in an effort to raise the profile of consumer issues both in regard to internal practice and externally. Moreover, the FSA Board decided to form a 12-person strong Consumer Committee, which held its first series of meetings in early 2002, was made up of representatives of regional

UK-based consumer associations and six members appointed through open competition.⁷¹ In 2007, the Consumer Committee was transformed into the *Advisory Committee on Consumer Engagement* (ACCE). John Harwood, Chief Executive of the Food Standards Agency, explained: ‘By acting as an *external challenge* [...], the new committee will help the FSA strengthen even further its engagement with individual consumers [...] [by] putting the resulting *shared expertise* into practice’ (FSA Press 2007b, emphasis added). This transformation, and the notion of citizens as stakeholders and hence an external ‘challenge’ rather than a mere ‘audience’, reflects once again the two-way, and mutually constitutive nature of the construction of actors and audience on a policy stage.

Another instance that points to the mutually constitutive nature of this relationship consists in the FSA’s development of a training program for consumer representatives, intended to help them get involved in policy more effectively. Moreover, the FSA holds so-called ‘*You Speak, We Listen*’ forums in collaboration with local public health agencies; their purpose is to improve policymakers’ understanding of the way in which people prioritize healthy eating in their diet, and the influences that lead them to establish these priorities (FSA 2006a). In addition, the FSA conducts an annual Consumer Attitudes survey (FSA 2000), whereby it does not only measure its own performance but, through asking specific questions and creating particular profiles, actively constructs its ‘audience’.

Moving on to the next cluster of notions, the consumer protection discourse is strongly characterized by the notion that consumers have (individual) *rights* and *choices* to make and that they should be enabled to do so without excessive governmental influence. An FSA respondent in the international policy branch expresses such a stance pointedly: ‘The government is committed to making change but the danger that Europe has and governments have is [...] being a nanny state’ (EN1-G; see also UK Cabinet/Better Regulation Commission 2006). Underlying such a view of the government vis-à-vis the consumer is the assumption that the consumer acts as an individualized agent who – with sufficient ‘information’ – should make her own choices. These need not be rational, but self-determined, even if those are to the detriment of the ecological or social conditions. The increasingly prominent focus on choice, both with

⁷¹ The open competition takes place under the Office of the Commissioner for Public Appointment procedures. Upon its establishment, it was charged with the following tasks: to point out to the Agency key issues of current or emerging consumer concern; comment on the Agency’s strategic objectives and forward plan; provide the Agency with responses regarding the effectiveness of its policies with respect to consumer concerns; to provide advice on consumer consultation methodologies, including ways of reaching ‘vulnerable and hard to reach’ groups, and on the value of consumer research; to review the work of consumer representatives on advisory committees; to facilitate joint working between the Agency and consumer groups; and to offer advice on any other potentially arising issues. Since its inception, the Committee has held four meetings per year, one of which (each year) has been publicly accessible.

respect to consumer protection and public health, might also imply a withdrawal from political responsibility on part of the authorities in charge of these policy areas.

In view of the hegemonic status of the notion of consumer choice, it is also important to note some of the discourses that challenge the ‘consumer-based’ policy approach at the FSA. First, a marginal ‘class perspective’ with respect to food (safety) policy has persisted since the 1970s, revived and remobilized in the aftermath of the series of food scares discussed above. A discourse that constructs food (safety) in terms of class inequalities would, for instance, challenge common representational claims, such as those of *Which?*, the NCC, as well as those of governmental agencies. Instead, it would call for more attention to disparate structures of access to food, and the constructed nature of the notion of choice in current policy discourse (see for instance, Lang 2003 and the Food Commission’s newsletters [see appendix B]). Second, the neoliberally inspired consumer approach rivals discursively with the notion that a *rational* consumer choice is not necessarily based on economic considerations, but also subjective perceptions of safety and quality and emotional concerns, which are, according to some scientists, scientifically unfounded (FSA Blog 2001; FSA 2003). The following quote summarizes this latter finding well:

People who *choose* to go organic may do so for many reasons: because they think it tastes better, they believe that it’s *safer*, more *nutritious*, better for the *environment* or better for *animal welfare*. Or perhaps simply because it’s more ‘*natural*’. This is great. By *offering extra choice* organic food has enriched the food lives of *consumers* [...] (FSA 2003, emphasis added).

In sum, the consumer protection discourse has contributed in substantial ways to the temporary fixation of meanings of food (safety) in England, not least because of the omnipresent yet flexible notions of being a consumer and a stakeholder. The discourse analysis and its focus on practice also revealed the constitutive nature of the category of ‘the consumer’: The (inter-)active invocation of a consumer ‘audience’ is essential to the development and performative rehearsal of the discursive roles that policymakers, scientists, and members of the industry take on. Finally, the findings suggest that the role of the consumer protection discourse cannot be considered without taking into account its historical roots. Its relative strength and particular nature in the English contexts can in part be explained by the dislocatory effects of BSE and FMD that facilitated a re-empowerment of previously marginalized discourses and the clusters of actors that came to discursively push for them. The next section further builds on these findings and discusses the discursive (re-)construction of food (safety) in terms of public

health, in order to show how notions of ‘healthy food’ have changed as a consequence of the dislocation of the post-WWII food (safety) policy discourse.

4.4.3 *Public health*

As explained in section 2 of the present chapter, the belief in a firm animal/human boundary was upheld for a considerable period of time in England, and diseases such as BSE were considered an animal health issue, rather than a matter of food safety and public health. The discovery of the link between BSE and nvCJD and the related dislocation of the boundary between animal and human health, however, was to change this, and gradually, the discourse of public health came to shape the meaning of food (safety) in policy discourse. The key notions, which again can be found summarized in table 4.1, shall be discussed here one by one as well as in connection with one another: the notion that food (safety) in itself constitutes a matter of *individual* (consumer) as well as *public* health; the notion that policymakers, scientists, and members of the industry are responsible for facilitating ‘healthier food choices’; and the notion that ‘natural’ (organic) food is ‘good food’.

To begin with, the 1998 White Paper discussed in section 4.3 (UK Cabinet 1998) constituted a key moment whereby food (safety) policy discourse shifted towards a public health discourse. The document stipulated a number of specific guidelines pointing in that direction: Principle 1 indicated such a move, in its recommendation that ‘the essential aim of the [Food Standards] Agency is the protection of public health’ (cited in Millstone and van Zwanenberg 2005: 215-6). The notion that food (safety) could be a public health issue, however, can also be traced further back, not dissimilar to the German case, as we shall see in the next chapter. In fact, the ‘new food movement’, alongside with institutional interventions such as the 1983 NACNE report mentioned in section 4.2 challenged the dominant notion that diet and healthy nutrition were matters of sufficiency and otherwise choice. Supported by the breakout of salmonella in eggs in the 1980s, these interventions and joint coalitions were to push for the return of food (safety) onto the policy agenda (Food Commission 2005: 5-9).

Regarding the notion of nutrition as an aspect of food (safety) and public health, the FSA and the Department of Health came to share a nutrition remit, whereas the first FSA strategic plan (2001-2005) largely concentrated on food *safety* issues. Soon enough, however, calls for a stronger focus on health and nutrition were voiced by various citizen groups, even more so in the aftermath of FMD. In 2001, Curry Commission re-invoked an explicit link between health, food, and farming (see section 4.3.4). Given that FMD was hardly a threat to public health (with

the exception of potentially dioxins being released through burning carcasses, see FSA 2001c: 4), this link speaks to loosening, and indeed broadening, meanings of food safety at the time.

Similarly pointing to the fluid nature of food (safety) policy, in a 2002 report 'Why health is the key for the future of farming and food', prominent British academics (from various natural-scientific and social-scientific backgrounds) critically addressed the state of food (safety) policy at the time: Farming and food strategy, the authors argued, should focus on 'health for all' as a central tenet and should give equal weight to both human and environmental health (Lang and Rayner 2002). The authors equally called for the promotion of food diversity as well as biodiversity in fields, and argued that the cost of foodstuffs should reflect their real costs of production. In interesting ways, the report combined a number of discourses informing food (safety) policy: environmental sustainability; public health concerns; economic concerns; and an emphasis on local supply chains and English food culture.

Concerning the resonance of the public health discourse in recent shifts, the discourse analysis suggests that nutrition policy has become a subfield of food (safety) policy as a result of the amalgamation of a public health and a consumer protection discourse. Initially, the FSA division that was tasked with nutrition was relatively small, while the current number of staff exceeds 50 people and involves five separate branches, two of which are particularly interesting here: First, there is a division charged with nutrition policy and strategy, for example, the reduction of salt intake as well as possible plans to reduce (saturated) fats in food and the promotion of a 'balanced diet'. A second branch of the nutrition division is charged with nutrition labeling as an instrument for promoting 'healthier' food choices, also directed at children. The latter is an interesting issue for at least two reasons: First, it constitutes a policy objective shared by the FSA and the Department of Health, which reveals the fluid nature of the policy area of 'food safety' since the 1990s. Second, very recently, a possible ban on food advertisements intended towards children after nine o'clock in the evening has been subject to a broad debate, and a group of major global food companies agreed on a pledge to stop advertising 'junk food' to children under the age of 12 - in an effort to self-regulate and avoid a ban being imposed by the European Commission (Halliday 2007). While the notion of a need to protect children and the so-called 'disadvantaged consumers' frequently forms the link between the consumer protection and the public health discourse, a more neoliberally informed language of *choice* also interferes in this linkage such as in the Government's White Paper (2004) titled 'Choosing Health'. The amalgamation of the discourses of public health and consumer protection hence remains fluid and contested.

Both the FSA and the Department of Health have reached far in their approach to ‘good food’, as transpires from the new notions of healthy food choices and the need to combat obesity not only as an *individual* but as a *collective* public health problem. Whilst this already indicates changing actor constellations in this policy subfield, members of the industry have also come to take on a discourse of public health: In 2006 the FSA launched a so-called ‘traffic-light’ labeling scheme system, whereby food products are labeled with traffic light symbols on the front of the pack that indicate the levels of fat, saturated fat, sugars, and salt (‘high’, ‘medium’, ‘low’) (House of Commons 2006: 85). The traffic-light system was established by the FSA in cooperation with retailers, after a series of consumer research projects had been undertaken to explore people’s understanding of and preferences for a range of signposting concepts, from among which traffic light symbols were eventually chosen.

If we consider this policy measure in discourse-analytic terms, two things stand out. First, the fact that the measure was designed in a fluid fashion between policymakers, scientists, members of the industry, and citizens; in other words, the public health discourse formed a bridge across those actor-categories, thereby exposing their functional differentiation as constructed. Particularly remarkable is then the notion that members of the industry are responsible for healthy choices, too, rather than only scientists and policymakers. In addition, the good governance discourse finds resonance here, which added to the feasibility of the policy measure. Contrary to the previously hegemonic requirement for ‘hard scientific evidence’ for policy, this traffic light measure is explorative in its nature, which indicates a shift in food (safety) policy practice inasmuch as scientists and policymakers did not insist on a strictly defined assessment of the traffic light scheme, but rather took a risk in improvising policy. That way, scientists and policymakers were led by a changing good governance discourse, a consumer protection discourse, and a renewed public health discourse. Through this amalgamation, these seemingly disparate policy actors entered into shared discursive positions where they collectively enact notions of being responsible towards the consumer.

Through this internalization of ‘food safety’ across institutional boundaries (which, in praxis, are unstable) and through the growing discursive amalgamation, the meaning of ‘food safety’ has become temporarily fixated to the extent that ‘safe food’ turns into ‘good food’. This notion finds expression in, for instance, the separate FSA *EatWell* website. The *National Fruit Scheme*, first introduced in the National Health Service Plan in 2000, and its (by now Europeanized) precursor, the *Five-a-day* program, which suggests (sometimes through labeling products) five portions of fruit and vegetables daily, speak to such a development, too. The Five-a-Day scheme was already introduced in the 2001 *Policy Commission on the Future of Food and Farming*, which

suggests that the link between food (safety), health, and farming came to enter the policy discourse through the dislocation of the post-war food (safety) policy discourse in the face of the FMD crisis, as suggested earlier. Moreover, it points to the significance of the FMD epidemic with regard to the shifting meanings of food *safety* and food *quality*, which has thus far been granted insufficient attention in the literature.

This discursive shift towards new notions of ‘good food’ is also mirrored and reproduced in publicly visible practices, such as the FSA ‘food competences framework’,⁷² the *What’s Cooking* Program, the *Traveling Cooking Bus*, *Healthy Schools* Programs, the organization of an annual (regionally-based) *Food Safety Week* and the 2007 *Year of Food and Farming*, and, last but not least, the performances of celebrity chef Jamie Oliver (who recently has been slaughtering chicken live on television) and his program on school dinners. Whilst they may seem anecdotal, from performativity perspective, I propose to consider these programs and initiatives as performative expression of the notion that cooking and ‘healthy food’ are socially valuable and beneficial activities for the sake of ‘reconnecting’ consumers with nature and landscape through food – a notion that was introduced in the Curry report.

Finally, the growth of media programs such as the weekly BBC’s *Food Programme* and the *Farming Today Programme* as well as the introduction of awards such as the BBC’s *Farmer of the Year* award (since 2004, where organic farmers have been awarded repeatedly) and the *Food Personality of the Year* indicate the continuous prominence of the issue. Practices such as awards can then be understood as public enactments of particular discursive positions, and the reinforcement of particular ‘truths’ associated with food. As far as other media outlets are concerned, the BBC Radio 4 *Food Programme* has a long history of reporting on food policy in general terms and food safety issues more specifically; similarly, the daily *Guardian* has constituted an important forum for the food movement in the UK, where the most renowned journalists include James Erlichman, Felicity Lawrence, Michael Pollan, and Mimi Spencer. In addition to a multiplicity of monthly magazines such as the *Observer* Food Monthly, a number of recipe magazines, some of them published by the BBC, indicate a growing trend towards (or a return to) an emphasis on localness and ‘naturalness’. Similarly, the BBC ‘talking food’ chat and the practice of inviting journalists such as Sheila Dillon and Felicity Lawrence to engage in online debates with citizens (*The Guardian* 2003) indicate that consumers are understood as active participants, rather than a passive audience for a given policy measure.

⁷² The framework is to be promoted through a nation-wide network of practitioners previously involved with the FSA. The framework rests on the themes of diet and health, consumer awareness, cooking, and food safety (FSA Press 2007a) and applies to children aged between five and sixteen.

As indicated visually in the clusters in table 4.1, again, these discursive shifts extend to industry practices, concerning issues such as salt intake, the use of artery-clogging trans fatty acids ('transfats'), and, last but not least, obesity. In 2004, a major industry association, the Food and Drink Federation, issued a *Food and Health Manifesto*, which committed manufacturers to reducing fats, sugar and salt in processed foods ('where technologically possible'), to reducing portion sizes, and to reflecting on tightening self-regulation with respect to food advertising (Food Commission 2004). While the FSA and the Department of Health supported the proposal, the Office of Fair Trading expressed concerns regarding possible effects on competition in the food sector. These concerns, I would argue, signal the intervention of the market efficiency discourse here, which I shall discuss further below.

After this discursive struggle to define the role of the industry in the domain of food (safety) policy, eventually, two major supermarket chains, Tesco and J. Sainsbury, announced in 2006 that they would reduce trans-fats in a range of their processed food products, following a publication in the *British Medical Journal* that recommended as much (Clark and Lewington 2006). Regarding the subject of salt intake, major retailers in the UK announced in 2006 that they would attempt to meet targets set by the FSA within a self-reporting framework, used to track progress by the food industry (see also FSA 2008b).⁷³ Moreover, the introduction of self-reporting frameworks suggests the shifts in the self-understandings of members of the industry, as some have come to anticipate what is expected of them by 'the consumer'. On the one hand, these frameworks point to the function of the notion of the consumer in forming connections at the level of discourse, as the recurrence of this specific notion in table 4.1 signals. On the other hand, the institutionalization of the notions of 'consumer expectation' and 'consumer demand' may hide away from the politics of industry self-regulation: Members of the industry are not unlikely to push for their own discourse, which is performed in the aim to maximize profits, sometimes at the expense of public health, while hiding behind the discursive shield of 'the consumer'.

In conclusion, this section demonstrated that the public health discourse that (re-)emerged in the aftermath of BSE and, notably, also FMD, has gradually come to shape and redefine the meaning of food (safety) in food (safety) policy in England. This is observable in key moments of transformation, such as in the Curry Commission report, which explicitly appealed to the notion of a link between food, farming, and public health – a link that the 'new food

⁷³ The role of supermarkets cannot be fully explored here, but the early development and introduction of food safety standards in the form of the British Retail Consortium is noteworthy. With respect to saturated fats and energy intake, the industry-led project *Neptune* equally indicates that the shifting public health discourse has been internalized and is being enacted by the industry.

movements' had pushed for in the 1980s already. The finding that nutrition is now discursively linked to food (safety) policy, too, indicates the increasingly fluid nature of this policy field.

4.4.4 Environmental sustainability

This section explores the fourth out of five discourses that shape the overall food (safety) policy discourse in the UK: environmental sustainability. Generally speaking, sustainability denotes a combination of values related to 'people, planet, and profit', or social, environmental, and economic aspects. The extent to which the respective notions feature in food (safety) policy, however, varies across contexts and over time. In England, the discourse of environmental sustainability is not an entirely new discourse; in its genealogy, it resembles the consumer protection discourse discussed in section 4.4.2, and its origins can be traced even further back to the 19th century, as section 4.2.1 indicated. By disentangling the various notions of which it is composed, we can arrive at a better understanding of how previously marginal notions are re-articulated here together with new notions, producing new discursive constellations. This section draws attention the following notions, which also appear summarized in table 4.1: the notion of reconnecting citizens, food, and landscape; the notions of animal welfare and nature conservation as principles of environmental sustainability; the notion that agricultural food production should be linked to environmental protection; the notion of food miles as something to be considered in organic foods; the notion of being a member of the food chain and bearing responsibilities as a stakeholder; the notion that organic prices are fair; and the notion of a collective, moral responsibility for environmental protection. I discuss these notions individually, in principle, but their very nature will sometimes require a more integrated presentation.

The notion of a disconnection between citizens, land, and food was first expressed in the Curry Commission report, and this very term, one could argue, speaks to the experience of a dislocation and fundamental ambiguity. The Curry Commission proposed that 'the real reason why the present situation is so dysfunctional is that farming has become detached from the rest of the economy and the environment' (Policy Commission 2001: 6). The report concluded as follows:

Our key message [...] is *reconnection*. Reconnection of farmers and the public through the *marketplace*, in sensitive *stewardship of the countryside*, and through dialogue about how to provide for the needs and aspirations of society at a *price* [we] are prepared to pay. We need to reconnect *all parts of the food chain* in this common purpose, managing the land for *profit* and *for public good* (Policy Commission 2001: 107, emphasis added).

Here, the notions of ‘reconnection’ and ‘being a part of the food chain’ function to discursively link seemingly conflicting discourses: that of market efficiency, on the one hand, and that of environmental sustainability, on the other hand. More specifically, the notions of the economic and profit-oriented needs of farmers are no longer seen in juxtaposition to those of society at large, the value of nature and the English countryside, or the rights of consumers. Instead, we find here an implicit appeal to a moral responsibility of not only policymakers but also society as a whole to be concerned with environmental sustainability, and the notion that agricultural (food) production should be linked to environmental protection.

These notions of reconnecting food (safety), citizens, and landscape (or environmental protection) find expression in a policy program announced in the Curry report, the aforementioned *Eat the View* program within the governmental agency Natural England. The *Eat the View* program, an involved respondent explains, emerged from a seminar that Prime Minister Tony Blair held with farming representatives: ‘They agreed that more should be done to promote the connections between food and farming and members of the public, but also people as consumers’ (EN12-G). This implies an appeal to ‘the public as consumers’, while the title of the program is in itself telling, too, as it expresses the discursive effort to link notions of landscape and ‘home’ to food consumption. A senior official involved in the program notes that

[p]eople became aware of the industrial nature of meat production and this had a huge impact on the sector. BSE was the major one that brought in a lot of food safety requirements there [...]. And because it was in papers a lot of people increased their awareness of food issues, farming issues. As well as other food scares like salmonella in eggs. The other major thing was Foot-and-Mouth disease back in 2001 (EN12-G).

The respondent points to the significance of food scares in bringing about awareness, and refers to both past crises (such as salmonella) and recent ones. This indicates that BSE cannot be considered as an isolated issue or crisis. Rather, a closer analysis points to a *gradual* process of meaning-making and a gradual shift in the meaning of ‘food safety’ that was induced by the *series* of events. Particularly when food became discursively linked to farming again through the notion of the food chain and the notion of a need to ‘reconnect’ the different parts of the food chain, seemingly disparate actors came together under a shared amalgamation of discourses, a linkage I shall discuss further below.

Returning to the notion of reconnection, again, a study of policy discourse through a performativity lens offers tangible examples. The *British Food Fortnight*, for instance, indicates a re-emergence of the notion of (re-)connecting food, farming, and citizens. The series of events

have been going on since 2002 – for instance, the annual *Ludlow Marches Festival of Food and Drink* in Shropshire, which is supported by the *Slow Food Movement*, and more generally, there has been a growth in food festivals. Whereas these series of events around Britain are not directly supported by the government, the range of supporting organizations shows the increasing interwovenness of seemingly diverse discourses, which in their re-configuration have come to share particular understandings around food (safety): churches; retailers; the Countryside Alliance, an NGO; health advocates (such as cancer prevention campaigns); farmers (such as in the NFU); the National Health Service (NHS); parents-teachers associations; and women’s groups.⁷⁴ This interwovenness indicates an increasing linkage between previously ‘disparate’ groups, such as farmers and health advocates, members of the industry, and environmentalists.

As table 4.1 indicates, the notion of the food chain in the discursive field around food (safety) occupies a crucial role in England (as well as in the other contexts studied here, as we shall see in chapter five, six, and seven). In order to understand its discursive function in producing coherence across discourses and contexts, it is useful to trace the notion of being a member of the food chain back to its origins. Whilst the idea of a ‘food chain’ originally stems from biology, its usage in a political sense can be traced back to two distinct sources (Jackson et al. 2006). First, in Immanuel Wallerstein’s work on world systems theory, a commodity chain is understood as ‘a network of labour and production processes whose end result is a finished commodity’ (Wallerstein 1974; Hopkins and Wallerstein 1986: 159, cited in Jackson et al. 2006). The second source is the ‘new political economy’ literature on food and agriculture, such as William Friedland’s work on the sociology of agriculture and the comparative analysis of production systems (e.g. Friedland 1984, discussed in Jackson et al. 2006). His analysis of technological change in agriculture led him to extend his perspective beyond the farm, taking into account corporate power and agricultural production systems – what would then come to be called the ‘food commodity chain’ (Jackson et al. 2006).⁷⁵

The food chain, a governmental working group states, ‘is pivotal to UK society’ (Foresight Working Group 2002: page unknown). ‘As well as supplying consumers with food, [...] [food chain sustainability] has direct effects on the health of the nation, employment and general economic well being’ (ibid.). Aided by this chain notion, the twin-epidemics of BSE and FMD generated a revival of the notion of the food chain in its politicized version, and its usage across

⁷⁴ For a full list, see <http://www.britishfoodfortnight.co.uk/weblinks/organisations-supporting-the-event/> [acc. 15 April 2008].

⁷⁵ See Jackson et al. (2006) for an analysis of the mobilization of the notion of the food commodity chain in social movements.

discourses and actor-categories has resulted in the (re-)emergence of particular discursive clusters both in governmental participatory practices and in collaborative modes between citizen groups, such as environmentalists and consumers, who, by virtue of the notion of belonging to a chain, come to negotiate a shared language of concerns.

This discursive position of the notion of the food chain is further strengthened by its interlinkage with the notion of *stakebolderness*. As the UK governmental Foresight Group expresses the discursive linkage,

food chain development is likely to be more rapid if the stakeholders are participants in the process. Indeed without such participation progress may not be possible (Foresight Working Group 2002: page unknown).

The literal alliances of ‘stakeholders’ within the ‘food chain’ have further produced constellations wherein previously marginal groups – such as the ‘new food movement’ groups of the 1980s – have experienced a sense of empowerment and have acquired more access to policymaking. In this institutional context, the notion of the food chain took on a bridging function, not least because it came to include the final consumer (Food Chain Centre 2007: 10; Foresight Working Group 2002: figure 1, page unknown).

Moving on to the next notion, the debates around organic food production and consumption reflect the discursive flexibility of the notion of ‘sustainability’ and an amalgamation of previously disintegrated discursive fragments. A closer study of the debate reveals the contested nature of this policy domain. To begin with, an important notion is that organic food prices reflect the ‘real price’ associated with supposedly more environmentally friendly, animal-friendly, and sustainable farming. By appealing to a ‘fair price’, a notion of moral responsibility towards nature is produced.

It is furthermore noticeable that interview respondents - including officials – firmly reject the notion that organic food constitutes a ‘market niche’ or ‘hype’, or a temporary trend. Virtually every supermarket chain sells and promotes organic food as more ‘natural’ or even ‘healthier’, and organic produce is frequently shelved by the entrance of large supermarkets. In addition, some retailers have chosen for TV commercials to promote organic produce, and one major retailing chain has even commissioned its own research regarding the ‘carbon footprint’ (‘food miles’) impact of a range of their organically produced food (Soil Association 2008). At the same time, the FSA officially claims a ‘neutral’ standpoint regarding the question of possible health benefits:

Basically we’re neither for nor against it, and we’re guided very much by what the science says. We recognise the important role it plays in providing choice for

consumers, but the balance of current scientific evidence doesn't support the view that it's more nutritious or safer than conventional foods (FSA Blog 2007).

Similarly, an FSA respondent in the international policy branch (with a science background) states: 'You can't tell people to eat things and what to do. The important thing is that they have the information there to help them make the right choices. You can't make them eat things' (EN1-G; see also UK Cabinet/Better Regulation Commission 2006). In contrast, DEFRA interview respondents openly declare, for instance, their convictions regarding the possible environmental benefits of organic food. In 2007, moreover, a study hailed the health benefits of organically grown fruit, vegetables and reared cattle, hence disputing the dominant FSA stance (BBC 2007).⁷⁶ On the other hand, counter-discourses continue to present themselves in this context and frequently come to be staged as scientific disagreements: Only shortly after the said report, a governmental report - a study of the environmental impact of food production - claimed that there was 'insufficient evidence' for claiming that organic produce has fewer negative ecological side-effects than conventional farming methods (although the authors did not take into account the aspect of biodiversity) (Milmo/*The Independent* 2007). The issuing of the 200-page document can be understood as performative in the sense that it invoked a critical counter-discourse in the debate surrounding British consumption of organic food. More specifically, it caused the staging of a renewed discussion on conventional farming methods, whilst conservationist notions of biodiversity that originated in the discourse of environmental sustainability were marginalized and the content and shape of the discussion delimited.

Over the past decade, however, organic food sales have grown tenfold, with a market growth rate of 22 percent in 2006 (Soil Association 2007); the UK organic foods market now ranks third in Europe after Germany and Italy (Soil Association 2007). In fact, organic demand has now increased to the extent that much of the organic food supply is imported, often from overseas. The latter development, in turn, has recently incited debates, both in government and with citizen groups, regarding the question of 'food miles', the ecological footprint of food products.⁷⁷ In addition, the DEFRA has been conducting extensive research on food miles, and the different ways in which to account for them remain debated. For instance, different means of transportation, distance, quantity, and type of product all require equally careful consideration in calculating food miles. In light of the range of discourses studied here, it is instructive to

⁷⁶ The study found that up to 40% more antioxidants could be found in organic fruit and vegetables than in non-organic ones (BBC 2007).

⁷⁷ The prominent academic and activist Tim Lang is held to be the inventor of the concept and has recently been awarded with the *Observer Food Lifetime Achievement Award*.

consider the different meanings that ‘food miles’ can take on, and the different notions that inform the practice of calculating them. A journalist sums up the contentious nature of the concept and the debate around it rather well: ‘In measuring carbon emissions, it’s easy to confuse morality and science’ (Specter 2008).

The notion that ‘food miles’ can and should be measured connects the discourse of environmental sustainability with that of market efficiency and the notion of consumer choice, which travels across different discourses, as is also indicated visually in table 4.1. Accordingly, the notion of food miles makes visible the connections between, if not the constructed nature of the distinctions between, the roles of the policymakers, the industry, citizens, and scientists. While the concept of food miles manifests itself in technical calculations and evidence-based policy practices, the concept also relies on romanticist notions of ‘preserving nature’ and changing ‘consumer’ behavior:

We all have a duty to our grandchildren to work towards more sustainable ways of producing our food. The Green Revolution has brought us plentiful and affordable food, but at an environmental cost. In the future we must develop ways of producing food that people can afford to buy in ways that give Nature more of a chance (FSA 2003).

Here again, a moral, collective responsibility for environmental protection is appealed to that invokes duties of citizens, policymakers, scientists, and not least the industry. The constellation called into being by virtue of this moral appeal signals a shift in policy discourse with important political implications for environmental protection. More specifically, on the basis of shared (chain-related) notions, these actor constellations may come to push for the consideration of environmental effects in food production, transport, and distribution in the future. It may be worth noting here that associations such as the Royal Society for the Protection of Birds as well as the Royal Society for the Prevention of Cruelty against Animals count among the most influential lobby groups in the UK – which indicates that the sedimentation of animal welfare and ‘landscape’ discourses had begun well before the outbreaks of BSE and FMD: It was the series of dislocations related to BSE and FMD that made their re-emergence possible and that facilitated their gradual institutionalization following the experienced institutional ambiguity. In consideration of the position of the environmental sustainability discourse in England, it is instructive to note that the primary certification body *Soil Association* has called for a re-labeling of organically produced food in cases where a certain limit of ‘food miles’ is exceeded. This again serves to indicate the relative strength of the environmental sustainability discourse in informing the meaning of food (safety) in this context.

Beyond the debates on organic farming, the work of the DEFRA and the construction of the value of 'nature' in policy discourse, the importance of the environmental sustainability discourse also finds expression in the work of the FSA. In 2004, the FSA Board agreed on a preliminary mission statement:

The Agency's remit is to protect the interests of consumers in relation to food, now and in the future. In doing so, the Agency will take sustainable development into account in all of its activities and policy decisions (FSA 2004c, cited in FSA 2008a).

The introduction of sustainability into the FSA's institutional role was, however, met with resistance, when it became evident that there is a lack of clarity about what exactly is meant by 'taking sustainable development into account' and when it seemed to interfere with the consumer protection discourse that had shaped the FSA's institutional self-understanding (FSA 2008a: 2):

A number of fundamental questions have arisen such as how pro-active the Agency should be in promoting the principles of sustainable development given our statutory remit. A key question is to what extent the Agency can, or should, balance food safety, health, information and other consumer interests compared with other aspects of sustainability such as environmental protection and use of natural resources? There is also the question of to what extent the Agency should seek to mitigate negative impacts, especially where those impacts fall outside of our areas of responsibility (FSA 2008a: 2).

In consideration of the initially limited statutory remit of the FSA and the dominant status of the notions of food (safety) and 'putting the consumer first', the mobilization of the notion of sustainability is remarkable, as it indicates a shift towards food *quality*. The successful institutionalization of the notion of sustainability moreover points to its quality as a (flexible) notion that connects the discourses of environmental sustainability, good governance, consumer protection, market efficiency, and public health: planet, profit, and people, as well as healthy food. In the FSA's own words, sustainable development has now come to be seen 'as an integral part of good policy making and should therefore be considered as part of the normal decision making processes' (FSA 2008a: 2). In other words, policymakers and scientists have internalized the notion of sustainability in their generic working practices, whereby the discourse of environmental sustainability becomes integrated into the discourse of good governance.

To sum up, the analysis of the environmental sustainability discourse indicates a renegotiation of the concept of 'food safety' and a resultant shift in meaning towards favoring

discursive clusters that assert notions of sustainability. This notion itself, however, remains contested, as diverse and rivaling discourses continue to inform what ‘sustainability’ means, that is, whether to prioritize ‘people’, ‘planet’, or ‘profit’ when it comes to sustainable food production and consumption. In conclusion, it is also worth reiterating the position of the notion of being a consumer in this discourse, to which diverse meanings are assigned to, such as bearing a moral responsibility for environmental protection, on the one hand, and being a choosing market agent, on the other. This discursive function carries even more weight when put into conjunction with the notion of being a stakeholder within the ‘food chain’. We shall see this discursive rivalry return in the next subsection as well as the other empirical chapters of this thesis.

4.4.5 Market efficiency

Moving further along table 4.1, this section discusses the final of the five discourses of this case study, the market efficiency discourse. This discourse frequently interferes with or wraps around other discourses and is therefore discussed in this final subsection. Accordingly, this section presents the core notions that give meaning to this discourse: the notion of the need to reduce excessive administrative burdens; the notion that a farmer’s role as an entrepreneur can be combined with that of an environmental steward can be combined; the notion of the need for cooperation and a sense of responsibility along the food chain; and a neoliberally inspired notion of the consumer whose trust is needed for market efficiency. Next to discussing the said notions in turn, this section demonstrates how these notions function to connect the collection of discourses identified here. The presentation of notions, in line with the composition of this discourse, will appear more integrated than in the previous sections.

Not unlike in other countries, food (safety) policy in England has increasingly been informed by the notion of excessive administrative burdens and the need to reduce ‘red tape’. Whilst the Thatcher government already proclaimed a ‘deregulation agenda’, the first Blair cabinet continued to assert the need for ‘better regulation’ and ‘regulatory impact assessments’ (see, for instance, the UK Cabinet Office *Better Regulation Executive*). In March 2005, the *Better Regulation Task Force* released its report *Regulation – Less is More* and the Hampton Review on ‘Reducing administrative burdens’ (see UK Cabinet 2006, cf. UK Cabinet 1999a, 1999b). In order to draw attention to the political implications of this notion, it is informative to note that the said review had been commissioned by the UK Cabinet and carried out by Philip Hampton, Chairman of J Sainsbury plc – a major supermarket chain. Hampton argued for a ‘risk-based approach’ to regulation, including the policy area of food (safety) and consumer protection, as this would

provide ‘the most efficient use of resources and [would decrease] [...] the cost on the compliant businesses while also providing protection for the individual’ (UK Cabinet 2006: 1). The fact that a supermarket chairman is tasked with developing a regulatory approach exposes the blurring of the roles of policymakers, scientists, and members of the industry in informing what ‘food safety’ comes to mean. At the same time, it also signals the ‘privatization’ of responsibilities for food (safety) and adds a producer-led tone to policymaking. Robert Baldwin (2006) furthermore points out that the Hampton Review echoes the ‘new Dutch approach’ of setting administrative reduction targets, as well as the EU approach.

In regard to food (safety) policy specifically, the Curry report invoked the need to enhance administrative efficiency in order to facilitate entrepreneurship on the part of farmers. In a similar fashion, the FSA laments ‘excessive or unclear regulations [that] can place a burden on business, the public and third sectors and so hinder effective delivery of the intended benefits’ (FSA 2006b: 3, emphasis added). In the FSA Regulatory Framework, we similarly find an appeal to

a balanced and effective market where [...] empowered consumers have the information they need to make informed choices’ and ‘intervention is only considered ‘where the market is not balanced, effective or [when it does not] provide proper levels of food protection’ (ibid., emphasis added).

In this quotation, one can observe the function of the market efficiency discourse in wrapping around the discourse of consumer protection and environmental sustainability. While encouraging industry self-regulation is arguably a common contemporary phenomenon, the discourse of market efficiency has come to shape food (safety) policy in specific ways. Whilst the immediate post-BSE years were marked by a discourse of consumer protection and good governance that called for combating the undue influence of the food and feed industry in policymaking, the FMD epidemic led to a new discursive amalgamation of environmental sustainability and market efficiency. The Curry Commission called for a

sustainable, competitive and diverse farming and food sector which contributes to a thriving and sustainable rural economy, advances environmental, economic, health and animal welfare goals, and is consistent with the Government’s aims for CAP reform, enlargement of the EU and increased trade liberalisation’ (Policy Commission 2001: 2, emphasis added).

Notions of environmental sustainability are clearly articulated in the Commission report, but they acquire a different meaning when expressed in conjunction with notions relating to a market-efficiency discourse. The concept of ‘sustainability’ is exemplary for this discursive re-

constellation and has strongly characterized DEFRA practices, including its *Organic Action Plan* (DEFRA 2002d), which emerged from the Commission report. The Curry Commission called upon farmers to be ‘entrepreneurs’ again, a quality that was believed to have been lost in post-war food productionism. By introducing the notion of entrepreneurship in conjunction with environmental protection and animal welfare, the report appeals to the notion that farmers can and should be entrepreneurs as well as environmental stewards. Moreover, a remarkably open (though not new in its nature) anti-EU discourse forms part of the discourse of market efficiency, as for some, the EU CAP is to blame for much of the post-war ‘inertia’, that is, an apparent lack in market orientation due to the CAP subsidy system. From a performativity perspective, the articulation of a difference between the earlier and the current approach constitutes an act whereby policymakers appeal to their new roles and responsibilities with respect to food and farming.

In the context of the institutional rearrangements discussed in section 4.3, a number of new initiatives and policy practices have been introduced that are intended to make visible a ‘new approach’ and that give expression to particular discourses. In response to what was constructed as a ‘crisis for agriculture’, for instance, the English Farming and Food Partnerships were set up, in order to ‘encourage and support collaboration and co-operation’. Another manifestation of this discursive amalgamation consists in the ‘little red tractor’ logo that was launched in 2000.⁷⁸ The standards that must be met for the logo to be used relate to concerns with food (safety), animal welfare, and environmental sustainability – discourses that then come to be visibly embodied in labels.

In addition, publicly funded schemes have been introduced that encourage farmers to convert to organic farming. Financial as well as practical advice (for instance, to ‘walk the chain’ – that is, visiting farms and food production premises) is then provided by the DEFRA. Moreover, farmers’ markets are encouraged – and indirectly funded through Natural England – all of which serves to indicate a growing environmental and process-oriented (rather than product-oriented) approach to food and farming policy. In an expression of this discursive amalgamation, Minister Hilary Benn addresses the farming community as follows:

You are responsible for managing around 75% of England’s green and pleasant land. [...] You and the generations before you have sculpted and shaped our landscape into the beauty that we, and millions of visitors to the country, can

⁷⁸ Eleven farm assurance schemes originally set up independently regarding beef, lamb, pork, poultry, dairy, vegetables, cereals and oilseeds standards, were brought together under the single little red tractor logo in 2000. The logo is intended, amongst other objectives, to provide standardized information regarding the country of origin.

behold and marvel at. Your efforts help give us health and prosperity through the food we eat, your contribution to rural communities and to our economy, and [in] your role in providing environmental goods and services [...] [y]ou can teach us all about how to live sustainably (DEFRA 2007b).

In this quotation, different connotations of farming are invoked: Farmers contribute to the economy; they are environmental stewards; their work serves aesthetic purposes; they provide healthy food. Society, Minister Benn suggests, wants to see the food and farming industry as ‘an industry that earns its way because of the *quality*, *safety*, and *environmental* and *animal welfare* standards of the food and other products it makes; in other words, *profitable* and *competitive* domestically and internationally’ (ibid.). In this way, a discursive constellation is invoked that, on the one hand, positions policymakers in alliance with citizens (‘animal welfare’, ‘environment’, ‘quality’) while, at the same time, farmers are associated with not only an economic but also a social responsibility. In this context, it is worth introducing the DEFRA *Farming for the Future* program. In this policy agenda, English farming by 2020 is envisioned as ‘profitable in the marketplace, continuing to produce the majority of the food we consume; [and] making a positive net environmental contribution’ (DEFRA 2008a). In addition, the program aims to deliver behavior change ‘necessary to realize that vision [...] [and to set] a new direction for the relationship between government and industry’ (ibid.).

Given this apparent amalgamation of discourses of environmental sustainability and market efficiency, it is worth reiterating that the price of organic food is in England largely seen to reflect a ‘fair price’, considering the costs that farmers incur by producing under what count as more animal- and environmentally friendly conditions (see section 4.4.3). Another indication of the relative strength of the environmental sustainability discourse is that there are virtually no official calls by the government to reduce prices, as one can observe in the case of the Netherlands, which will be discussed in chapter six. Instead, the notion of the ‘emotional consumer’ has entered the debate, whereby, on the surface, a neutral stance is claimed regarding organic food, while at the same time it is emphasized that organic food consumption – and thus higher food expenditure – is a legitimate choice (even if not *economically rational*). In other words, the boundaries of the market efficiency discourse are fluid, and what we find here are the same notions we observed in the discourses of environmental sustainability as well as consumer protection. One may conclude, therefore, that notions such as consumer choice function to connect the different discourses and, in such a manner, make for a seemingly coherent and stable overall policy discourse in the area of food (safety).

Moving further, the notion of being a member of the food chain has played a key role in the reconstruction and restabilization of food (safety) policy discourse, as already observed in the discourses of good governance, consumer protection, and environmental sustainability. Regarding its function in the discourse of market efficiency, an account of the Food Chain Centre is insightful for the multifaceted meanings of being an actor-member of the food chain and the specific role of the industry therein. The FCC was established by the UK government in 2002 upon the recommendation of the Curry Commission (and disbanded in 2007 upon the completion of its mission). The Commission believed that farming had become ‘detached from the rest of the economy and the environment’ (Food Chain Centre 2007: 4). The invocation of the notion of a chain signals this sense of disconnect at a time when food and farming were once again called into question with the arrival of FMD. In line with the desire to ‘reconnect’, the main purpose of the FCC was to lead the sharing of information along the food chain, to support trading relationships, to develop improvement techniques by way of specific pilot projects in different farming sectors, and last but not least, to help promote organic farming (see DEFRA 2002c: 30; cf. Policy Commission 2002: 89, recommendation 76).

Next to its educational mission to train farmers in increasing profitability, the FCC was also charged with reviewing consumer research and its implications for farming. Even though the mission of the FCC focused on fostering industry development, the notion of a ‘demanding consumer’ entered the policy discourse here. In other words, notions of consumer demands and notions of entrepreneurship emerged alongside one another. A concrete example can be observed in the release of data regarding consumer trends that were specifically selected and interpreted for farmers. This was the first time such detailed consumer insight was made available to the farming industry in the UK (Food Chain Centre 2007: 8), which reveals the tremendous discursive effects of the diseases as well as the weakening of the institutional division between food production (farming) and food consumption. On the other hand, the notion of ‘knowing what the consumer wants’ (such as strawberries in December) can serve to hide away from what more marginal, critical groups of consumers would demand instead.

The notion of the food chain further produces a mutual positioning between policymakers and the collection of actors that come to be included as ‘stakeholders in the chain’. This chain becomes constructed as responsible for guaranteeing safe food, frequently pushed by a ‘naming and shaming’ policy with regard to product recalls. In addition, the notion of being a ‘stakeholder’ in ‘the food chain’ manifests itself in a number of industry platforms at the DEFRA and the FSA. These actor constellations, however, remain contested, in particular because of the FSA’s alliance with the ‘consumer’ vis-à-vis the farming lobby (at the former

MAFF) – in fact, both industry and consumer ‘stakeholders’ come to charge policymakers of being too involved with the other party. The ‘consumer connotation’ of the notion of holding a stake, however, does become articulated by members of the industry themselves at times: At a recent FSA *Industry Organization Stakeholder Forum*, a member of the beverage and food industry requested that the term ‘public interest group’, used by the FSA in inviting stakeholder participation, could better be changed to ‘consumer representative’ (FSA 2007: 8). Likewise, the bridging function of the twin-notions of being a member of the food chain and being a stakeholder finds expression in the proposition of FSA officials to hold joint meetings between the FSA *Industry Stakeholder Forum* and the *Consumer Stakeholder Group* (FSA 2007: 9).

Moving on to a related notion, there should be no doubt about a strong, neoliberally-inspired notion of ‘the consumer’ in England, introduced by the Thatcher cabinet and translated by the Blair cabinet into a language of ‘New Labour’. In the 1999 *White Paper Modern Markets: Confident Consumers*, for instance, the government envisages ‘confident consumers, making informed decisions in modern, competitive markets, promot[ing] the development of innovative and good value products’ (UK Cabinet 1999c, cited in NCC 2004: 2). Similarly, John Vickers, Director General of the Office of Fair Trading, constructs ‘the consumer’ as a market agent and emphasizes the need

to raise the emphasis on active and aware consumers [because] when consumers are in the driving seat, businesses will compete harder for their money. This will be good for consumers, for businesses that serve consumers well, and for the economy as a whole (BBC 2003; cf. Vickers 2003).

Once again, the notion that ‘the consumer must have a choice’ forms the connection between market efficiency and consumer protection at the level of discourse. Given the prominence of these ‘connecting’ notions, I conclude that - whilst the new institutions, FSA and DEFRA, have also been informed by a discourse of market efficiency. This relative strength of the market efficiency discourse finds expression in the notion of a need to enhance efficiency and to encourage farmers to be entrepreneurs, whereas the discourses of consumer protection and environmental sustainability have posed a significant challenge to the market efficiency discourse, too, finding expression in the notion of farmers as environmental stewards and guardians of landscapes as collective goods.

In conclusion, an important overall finding regarding the market efficiency discourse is its gradual (re-)emergence after the FMD outbreak, when its relative strength grew by virtue of the construction of farmers as ‘victims’ of FMD, whereas they had had to take a considerable share of blame in the aftermath of the earlier BSE crisis. The notion of a need to ‘reconnect’ the

members of the food chain, feed and food, producers and consumers, land and produce, played a particularly strong bridging role in this discourse, while its effects are also observable in the other discourses discussed here as part of the policy field in the UK. I shall summarize the central findings below in order to accentuate the overall stable nature of contemporary English food (safety) policy discourse and to highlight the key notions that form bridges across actor-categories and between discourses.

4.5 Concluding remarks

This chapter introduced the first of three country case-studies and was concerned with an analysis of changes and continuities in the English food (safety) policy discourse since the 1990s. The point of departure was two-fold: First, the effects of food scares and the FMD epidemic, as this chapter has shown, must be studied in terms of the context in which particular meanings around food (safety) come to prevail over others. Second, and in contrast to a great part of the previously existing research, this study understands contemporary food (safety) policy in England to be shaped by multiple historical junctures. At such moments of transformation, this chapter proposed, the hegemonic policy discourses become dislocated, some of their elements break down, and new as well as previously marginalized discourses can emerge. That way, this study could accentuate the significance of BSE and FMD in dislocating the hegemonic post-war policy discourse around food (safety) policy in the UK and in bringing about an unexpected link between farming and public health, as observable in the Curry report.

In light of the subsequent empirical chapters and the comparative angle of this study, it is useful to briefly summarize the findings of this chapter. Following a brief introduction, section 2 contextualized the chapter narrative in the history of British food and farming and drew particular attention to the discursive notions that shaped post-WWII food (safety) policy as these were to shape the interpretation of the food scares to a significant extent: the hegemonic post-WWII priority of food security and maximizing production; a specific notion of scientific expertise that was considered to be an authoritative resource for policymaking; and, last but not least, the notions proclaimed by the ‘new food movement’ of the 1980s, consisting of environmental protection, consumer protection and consumer rights, food (safety) as a public health issues, and (class-related) food poverty. Next, section 3 gave a descriptive account of the events around BSE and FMD and presented the key institutional interventions and performative moments of transformation that accompanied and followed the aforementioned food scares. The core findings of this case study are summarized in table 4.1 below.

Table 4.1: English food (safety) policy discourse: key notions

Good governance	Consumer protection	Public health	Environmental sustainability	Market efficiency
<p>PSCI</p> <ul style="list-style-type: none"> * Food (safety) policy and scientific advice should be conducted in an open, independent, and transparent way * Consumers must be put first * There is a need to rebuild and sustain citizens' trust in food (safety) and open communication is a good way to achieve this *The food and farming industry must not be too prominent in policymaking * Cooperation along the food chain is essential for policymaking and includes scientists, policymakers, industry, and citizens. * As part of the food chain, citizens are stakeholders * Lay participation in scientific committees improves policymaking 	<p>PSCI</p> <ul style="list-style-type: none"> * Consumers must be put first * The food and farming industry must not be too prominent in policymaking * There is a need to rebuild and sustain citizens' trust in food (safety) * Consumers have rights * Consumers must be able to make informed choices * As part of the food chain, consumers are stakeholders * Consumer rationality is not restricted to economic considerations * It is a problem that some groups of the population cannot afford organic food, but organic prices reflect the real costs of food production * Lay participation in scientific committees improves policymaking 	<p>PSCI</p> <ul style="list-style-type: none"> * Food (safety) and nutrition are public health issues * Citizens (should) choose to be healthy * Consumers (especially children) must be educated about and protected against food (safety) problems * Scientists, policymakers, and the industry should help citizens make healthier food choices * Cooking is a socially valuable activity and can contribute to better health awareness 	<p>PSCI</p> <ul style="list-style-type: none"> * The problem is that landscape, food, and citizens have become disconnected * Food miles are a scientifically founded concept and should be considered in (organic) food production and consumption * It is a problem that some groups of the population cannot afford organic food, but prices reflect the real costs of food production * Sustainability should be a guiding principle *Coordination and cooperation along the food chain is essential for policymaking and includes scientists, policymakers, industry, and citizens. * Stakeholders along the food chain have responsibilities for environmental sustainability 	<p>PI</p> <ul style="list-style-type: none"> *Excessive administrative costs should be controlled *Private regulation can be more efficient * Farmers can be entrepreneurs and environmental stewards simultaneously *Consumers must be able to make informed choices * Trusting consumers are good for market efficiency * Coordination and cooperation along the food chain is essential for policymaking and includes scientists, policymakers, industry, and citizens.

Categories:

P = Policymakers

S = Scientists

C = Citizens (e.g. consumer advocates, environmental groups)

I = Members of the food industry

In bold: recurring notions that connect discourses and actors

Section 4.4.1 discussed the discourse of ‘good governance’ and the most central notions of which this discourse is composed: the notion that the influence of the agricultural lobby should be reduced for the sake of good governance; the notion that the consumer, who is also a competent lay participant and a stakeholder in the policy process, should be put first, not least for restoring and sustaining citizen trust; the notion that good governance requires ‘openness’ and ‘transparency’ in the policy process, as well as in scientific expertise. In the analysis of institutional change and praxis, I observed that the formerly linear model of risk analysis – assessment, management, and communication – disintegrated, whereby new understandings of what ‘good science’ and ‘good policymaking’ are have emerged.

This specifically integrated science/policy nexus is closely related to the relative weight of the consumer protection discourse in the overall policy discourse. As section 4.4.2 recounted, within this discourse, the key notions, as indicated in the table, are the following: consumers must be put first (and above the interests of the food and feed industry); the consumer must be enabled to make informed (and preferably healthy) choices; citizens must trust in government and scientists for policy to function; citizens are understood to be consumers and constitute stakeholders in the food chain; citizens, as stakeholders, can contribute to and participate in food (safety) policymaking; and consumer rationality need not be based on economic concerns alone. This discourse signals the function of the BSE and the FMD epidemics in empowering a discourse of consumer empowerment, which could draw on an infrastructure for such a movement that had already been established earlier, institutionalized in consumer advocacy groups, such as the NCC and *Which?*. It is therefore not as ‘new’ as it may seem, but rather, a re-empowerment of a previously existing movement. A side-effect of this development has been the emergence in the UK (compared to the other countries studied here) of participatory policy practices that, in their nature and extent, go beyond those in other EU countries, including the cases studied for this thesis (see Loeber and Hajer 2007). At the same time, the language of consumer choice and ‘putting the consumer first’

also bears traces of neoliberal market efficiency discourses and individualist notions of the consumer, not least as a legacy of the Thatcher government.

Section 4.4.3 explored the discourse of public health and investigated the meanings of food (safety) within this discourse, as well as the discursive clusters of practices it has produced, in particular those based on the notion of nutrition forming a subfield of food (safety) policy. In this context, one can observe clusters where policymakers, scientists, and members of the industry come to merge under and push for (rivaling) notions of 'responsibility' towards the consumer. Often, these clusters are equally informed by discourses of good governance, market efficiency (expressed in 'deregulation'), environmental sustainability, as expressed in the notion that organic food is good food, and consumer protection (manifested in the attention paid to 'rights' and 'choices' of the consumer). What one can observe here is a merging of previously distinct policy areas as a product of the dislocation of the post-WWII policy discourse that separated food production from food consumption by virtue of focusing on productivity and self-sufficiency, rather than consumer health protection.

Next, section 4.4.4 discussed the discourse of environmental sustainability and stressed the notions of connecting environmental protection and agricultural production, the calls for improved animal welfare, landscape and nature protection, and the notion of reconnecting citizens with the origins of food, that is, regions, landscape, and the natural environment. A particular important finding here concerned the notion of reconnection that was appealed to in the aftermath of BSE and FMD, and how this generated, at times, an appeal to a collective, moral responsibility towards the environment, but also an individual responsibility.

In section 4.4.5, this chapter examined the discourse of market efficiency and discussed the notions of which it is composed: the notion of the need to reduce excessive administrative burdens by means of encouraging private regulation; the notion that farmers must be entrepreneurs; the notion of enabling consumer choice for the sake of a well-functioning market efficiency; and the notion of the 'food chain', which supports cooperation between policymakers, industry, and scientists. At the same time, that section concluded that some of these notions form bridges between the discourses of environmental sustainability, consumer protection, and market efficiency – most importantly, those of consumer choice, the need to rebuild and sustain trust, and the notion of farmers being entrepreneurs. These recurring notions are highlighted in bold across the table above.

In sum, the new actor constellations that have emerged from the reconfiguration of new discourses and previously more marginal ones indicate both change and continuity in English

food (safety) policy discourse. While we can observe the persistence of notions of individual choice inherited from the Thatcherite policy discourse, the environmental sustainability discourse, which was more marginal prior to the BSE and FMD crises, has experienced a significant revival. Due to the double-force of BSE and FMD, an environmentalist understanding of food (safety) could emerge alongside a strong consumer protection discourse, as both could draw on a previously existing infrastructure present as early as in the 19th century and, in a more pronounced manner, in the 1980s' food movement recounted in section 2 of the present chapter.

Keeping in mind the particular composition of discourses identified in the case of England, the next two chapters present the cases of Germany and the Netherlands, where the discourse analysis will reveal the fundamental contingency of the meanings of food (safety) across those contexts and over time.