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# BOROUGH MARKET

**FOOD POLICY**

2022



# BOROUGH MARKET FOOD POLICY

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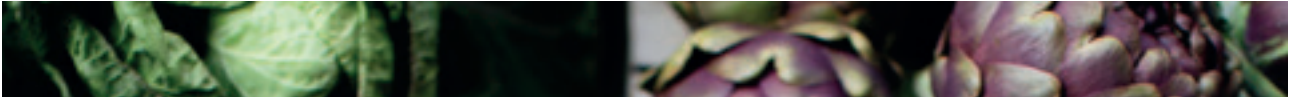
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**“BECAUSE THE PRINCIPLES THAT DEFINE OUR FOOD HAVE NEVER BEEN CLEARLY DRAWN UP, IT HAS NOT BEEN POSSIBLE FOR THEM TO BE SHARED, TESTED OR CHALLENGED. THAT IS WHAT THIS POLICY SEEKS TO CHANGE.”**



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# PART ONE: BACKGROUND

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**“IT IS INCUMBENT UPON THE MARKET TO SERVE THE NEEDS OF THE LOCAL COMMUNITY, WHICH, LIKE MUCH OF CENTRAL LONDON, IS HIGHLY DIVERSE, IN ETHNICITY, CULTURE, AGE, EDUCATION AND WEALTH.”**



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## WHAT IS A FOOD POLICY AND WHY DOES BOROUGH MARKET NEED ONE?

Borough Market is, by centuries-long tradition, a food market. As a result, our approach to food informs absolutely everything we do here. Together with Place and Voice, Food is one of three strands that make up the trust's current Vision Statement, but it's the source from which the other two flow. Food instructs what Borough Market looks like and how we talk about it. It's the main reason we're here.

Despite – and in part because of – the centrality of food to the Market's activities, the trust's approach to food has never actually been formally defined. Since its rebirth as a retail market in the late 1990s, Borough Market has managed to project a strong sense that there is such a thing as 'Borough Market food', but it has remained just that: a sense, an implicit understanding. The trust has in recent years embedded some basic conditions into the application processes for new traders and new products, but that is as far as we have gone.

As a result, the Market's many stakeholders – traders, trustees, staff, customers, local residents, charity partners, government, journalists – are likely to maintain their own singular perspective of what Borough Market food is or should be, and those perceptions may differ from each other, sometimes quite markedly.

Because the principles that define our food have never been clearly drawn up, it has not been possible for them to be shared, tested or challenged. That is what this policy seeks to change.

By extension, it should:

- Provide a coherent and consistent base for strategic planning and operational decision-making.
- Ensure that Borough Market's approach to food is manifested in all parts of its operation, including those not directly involved in the sale of food.
- Assure shoppers that the food they're buying measures up to their expectations of what Borough Market food should be.
- Allow the Market's messaging to be clear and accurate.

A food policy is not a set of definitive, detailed rules, ready to be applied instantly. Instead, it is an attempt to clarify the fundamental principles that will inform the Market's long-term strategy and, in time, assist in the formulation of those more granular rules.

Nor is it set in stone. The trust's priorities will inevitably change as Southwark and the wider world change, and this food policy will need to be adapted to reflect that evolution.

**“EXPECTATIONS OF TRADERS IN DIFFERENT FOOD CATEGORIES SHOULD BE CONSISTENTLY HIGH, BUT THEY SHOULD ALSO BE REFLECTIVE OF THE FUNDAMENTAL DISPARITIES IN HOW DIFFERENT SECTORS ARE STRUCTURED.”**





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## WHO DOES THIS FOOD POLICY SEEK TO BENEFIT?

The charitable purpose of Borough Market, as registered with the Charity Commission, reads in part:

*“The provision of a market as a public amenity for the benefit of the public...”*

Within the trust, work is currently underway to further clarify what this purpose means in practical terms, but the key point is that the Market’s benefits, whatever they might be, should be accrued by a broad constituency of people.

There is a clear imperative that can be drawn from this statement: unlike most marketplaces, Borough Market should be aiming for outcomes that go beyond the creation of profit. For the Market to function, it is absolutely essential that traders make money and that the trust remains financially secure, but the economic success of the Market and its stakeholders must serve the charity’s wider purpose, rather than being an end in itself. The food sold and consumed here has a clear commercial function, but it can and should do much more than that.

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## BOROUGH MARKET IN THE COMMUNITY

Borough Market has a particular responsibility to the area in which it is located. The Market has been in Southwark for 1,000 years, was rescued from oblivion by local residents in the 1750s, and will forever retain an inextricable link to this exact location.

It is incumbent upon the Market to understand and serve the needs of the local community, which, like much of central London, is highly diverse, in ethnicity, culture, age, education and wealth. In Southwark, privilege and poverty sit cheek by jowl. Borough Market needs to be conscious of that diversity.

That means providing all local people with access to good food. It also means providing ready access to the Market’s other great resource: the impressive levels of knowledge and expertise among its traders and other stakeholders.

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## BOROUGH MARKET IN LONDON

As well as considering its role within Southwark, Borough Market needs to take account of how it fits into the wider landscape of London food. What does it offer the people of London that the city’s other markets and food retailers can’t or won’t? How does it align with the London Food Strategy?

Many of the visitors to the Market don’t live or work in London. In large part due to its central location, Borough Market has in recent years become one of the city’s biggest tourist attractions, bringing in one-off visitors from around the UK and the rest of the world. One of the aims of this food policy should be to ensure that, while the Market remains welcoming and accessible to all visitors, its approach to food is not shaped by the demands of tourism, to the detriment of regular shoppers from its home city.

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## BOROUGH MARKET IN THE WORLD

Because of its popularity, its accessibility to local and national media, and its success in building a strong brand, Borough Market has an influence that belies the small scale of its estate. For better or worse, what happens at Borough Market makes the news. The Market has also built strong connections with markets, authorities, professional bodies and charities, not just in the UK but around the world.

At times, managing this exposure and interconnectedness can be a challenge, but it also presents an enormous opportunity. By adopting a food policy that is ambitious in its scope and coherent in its aims, and by loudly trumpeting the contents of that policy, the Market has the chance to not only condition its own future but have a positive influence on the world far beyond its trading halls.

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## **WHO DOES THIS FOOD POLICY APPLY TO?**

The produce sold by the Market's traders is the most visible manifestation of Borough Market's approach to food, but it is far from the only one. This food policy needs to apply to everything that happens at the Market.

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### **THE TRUST**

There are trust-wide decisions that have a significant impact on the shape of the Market's food offering: how the overall balance of the Market's offering is assessed and altered (the balance between produce and catered food, between British food and international food, between producers and merchants, between specialists and generalists, between basics and luxuries); how individual traders and tenants are selected; what conditions are placed upon them; how the Market's food is audited; how the estate is managed; how the Market engages with the community. When the trust is developing strategies that address such questions, or touch upon any other food-related areas, those strategies should be strongly informed by this food policy.

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### **TRADERS**

Shoppers have a reasonable expectation that all food sold by Borough Market's traders reflects the same set of standards. Based on this policy, the trust must, over time, develop a clear set of food standards that will be applied consistently across the trader base, covering both new and existing traders, and both produce and catered food. In doing so, there needs to be recognition of the breadth and complexity of the Market's offering. Expectations of traders in different food categories should be consistently high, but they should also be reflective of the fundamental disparities in how different sectors of food production and retail are structured, both nationally and internationally. Rather than making overly bold catch-all commitments that cannot be meaningfully implemented, the Market should use the underlying principles in this policy to develop nuanced rules for each category, and should draw upon the traders' own knowledge of their sectors to do so.

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### **TENANTS**

The Market has less direct control of the day-to-day activities of its commercial tenants, but it does have considerable autonomy when choosing who to let properties to. As far as possible, the Market should seek to ensure that its tenants' approaches to food align with the principles outlined in this policy.

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### **STAFF**

All staff should be expected to have a good level of knowledge of the Market's food policy and of the food sold by the traders, and should be given the regular training they need to enhance that knowledge and embed it into their work.

When food and drink is being provided by the business for consumption at meetings or events, either internally or with third parties, it should wherever possible be bought from Borough Market traders. If food and drink is required that is not available within the Market, the principles in this policy should be taken into account when choosing what to purchase and where to purchase it from.

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### **THIRD PARTIES**

When Borough Market is exploring the potential of entering into relationships with third parties – for example, letting its events spaces, providing filming and photography permissions, or agreeing to commercial or promotional partnerships – the extent to which those parties align with this policy should be a key consideration.

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# PART TWO: PRINCIPLES

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**“TWO OF THE MOST IMPORTANT WAYS THAT BOROUGH MARKET CAN BENEFIT THE PUBLIC ARE TO MINIMISE ITS OWN FOOTPRINT ON THE WORLD AND ACT AS AN AMPLIFIER FOR SUSTAINABLE APPROACHES TO FOOD PRODUCTION AND RETAIL.”**



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## QUALITY

While 'quality' is not easy to define, its pursuit should be Borough Market's overarching aim. The simplest formulation for our aspiration is that the food sold at Borough Market should be among the best available examples of its type. This should take into account its form, its flavour and its impact on the wider world. Almost every item in this policy will have a marked effect on food quality, but there are a few conditions that stand alone:

- Products should provably be what they claim to be, supported by clear labelling, highly informed staff, and the use of reputable certification and protected name schemes.
- Produce should be sold when it is in season at its place of origin, both for its bearing on flavour and the environmental benefits that accrue from producing food in its natural environment with minimal intervention.
- Produce should be sourced, transported, stored and displayed in a manner that optimises its quality.
- Produce that is sold fresh should be as fresh as it can be. Every effort should be made to repurpose produce that is past peak freshness but still of sufficient quality to be eaten. However, it should be labelled as such.
- Catered food should be made using the same quality of produce expected of the produce traders.

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## ENVIRONMENTAL SUSTAINABILITY

Globally, the negative environmental impact of industrialised food production is vast and growing. Two of the most important ways that Borough Market can benefit the public are to minimise its own footprint on the world and act as an amplifier for sustainable approaches to food production and retail.

Some of this will stem from the trust's institutional approach to, for example, waste disposal and power use, but the greater part of the Market's leadership in this sphere will depend upon the methods used to produce the food sold by its traders and tenants.

Environmental sustainability is a hugely complex concept. As a result, it is vital that the conditions applied to Borough Market food have substance and nuance, and avoid easy generalisations. For example, it is not always the case that food produced locally has a lower carbon footprint than food produced under different conditions further afield and shipped here. It is not always the case that all certified organic food has been produced in a way that has a lower environmental impact than some non-organic food.

One of the structural problems with the British food industry is that the industrialised scale of retail makes it difficult for responsible, small-scale, low-intensity producers to find outlets for their food, so it is important that markets like Borough are able to provide a clear alternative.

Fully defining environmental sustainability will require detailed category-by-category investigation, but in broad terms Borough Market should only sell food that has been produced in a way that has a demonstrably less damaging effect on the environment than large-scale producers and retailers – and ideally a measurably positive effect. This should include:

- Carbon emissions
- Biodiversity
- Fish populations
- Soil health
- Embedded water
- Air quality
- Water pollution
- Plastic pollution
- Waste disposal



**“IT IS VITAL THAT SHOPPERS ARE ABLE TO EASILY ACCESS INFORMATION ABOUT THE PROVENANCE AND CULTURAL CONTEXT OF THE FOOD THEY ARE BUYING AND THE BEST WAYS TO EXTRACT BOTH PLEASURE AND VALUE FROM ITS CONSUMPTION.”**



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## **SOCIAL & ECONOMIC SUSTAINABILITY**

The Market itself needs to be economically sustainable, which means that the conditions must be in place for traders and tenants to make a fair profit and for the trust to bring in the revenues needed to function day-to-day while also investing in the future. This should not, however, come at an unfair cost to staff and suppliers.

- The trust and all traders should pay their staff at a level that matches or exceeds the living wage, as defined by the Living Wage Foundation or an equivalent body, and should expect their UK-based suppliers to do the same.
- Merchants importing products or ingredients from other parts of the world should take all reasonable measures to ensure that fair pay and working conditions are in place throughout the supply chain.
- Traders should seek equity of reward through the supply chain, particularly to the producers.
- Traders, lessees and other stakeholders should be able to demonstrate a commitment to equity, diversity and inclusion through their hiring and pay policies.
- Traders, lessees and other stakeholders should take all reasonable measures to ensure that slavery, servitude, forced / compulsory labour or the use of children in the workforce do not feature anywhere in their supply chain.
- The Market should provide space and support for social enterprises that offer employment and training to marginalised communities.

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## **ANIMAL WELFARE**

In the UK today, animal welfare is too often sacrificed in the pursuit of cheapness and efficiency. There is no reason for Borough Market to allow that to happen, not just for ethical reasons – although those are clearly compelling – but from the positive impact on the quality of meat, milk and eggs that comes from animals living a full, active, happy life and being fed a rich and varied diet. High animal welfare standards should be expected not just of traders specialising in meat, fish and dairy, but those that feature animal products anywhere in the supply chain, including catered food traders.

- Traders should only sell meat and dairy from producers who rear their livestock using methods that minimise the stress on animals, prioritise natural diets, and keep animals outdoors unless there is a compelling welfare reason not to.
- Minimising the negative effects of transportation on animal wellbeing should also be a priority, accounting for both the distance and mode of travel.
- Traders should only sell meat processed by abattoirs that provide demonstrably high standards of animal welfare and food safety.
- Butchers and fishmongers should possess the skills and knowledge to ensure that as much of the animal is utilised as possible and be committed to passing on that knowledge to customers and encouraging them to do the same.
- Live marine animals sold in the Market should be kept and killed in the most humane way possible. Knowledge of humane storage and killing should also be actively provided to customers buying live marine animals.

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## **KNOWLEDGE & TRANSPARENCY**

For the application of the above principles to be truly meaningful, it is vital that shoppers are able to easily access information about the provenance and cultural context of the food they are buying and the best ways to extract both pleasure and value from its consumption. As well as selling goods, the Market needs to be a vendor of knowledge, through labelling, signage, conversations with customers, and other communications.

- While the breadth of the overall offering is important, trader selection should be weighted towards specialists who have a high level of knowledge of their sector.
- Particularly in those food categories that can easily function without the use of wholesale markets, priority should be given to foods that are produced by the trader or sourced directly from the producer.



**“BOROUGH MARKET SHOULD PROVIDE THE OPPORTUNITY FOR PEOPLE OF ALL BACKGROUNDS TO BUY THE FRESH INGREDIENTS AND MINIMALLY PROCESSED PRODUCTS THAT UNDERPIN A HEALTHY DIET.”**





- Traders should be able to display good knowledge of where their food came from, how it was produced, who produced it, and how best to use it.
- Knowledge should be held not just by the owners but by the staff on the stall.
- The Market should favour foods that have been produced or processed using traditional skills, particularly those that are at risk of disappearing.
- All labelling and promotion should demonstrate high levels of transparency and integrity.
- The Market's staff and trustees should have good knowledge of the food being sold.
- The food knowledge of the traders should be used to provide opportunities for education and training, particularly within the local community.

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## **OPPORTUNITY**

Borough Market should provide a platform for small businesses, including those at the start of their journey. The challenge is that, while a food business's small scale often correlates with high levels of specialist knowledge and low environmental impact, that same small scale may also be an impediment to providing a stall at a busy seven-day market. Indeed, several small food producers and merchants have in recent years chosen to leave Borough Market because manning a stall full-time proved uncondusive to the other demands of their work. This needs to be addressed.

- Trader selection should be weighted towards small businesses.
- Borough Market should find ways to accommodate food produced by small, specialist businesses that are too small to run a full-time stall themselves.
- The Market should facilitate the support, mentoring and training needed to help promising start-up businesses grow to a viable scale.
- In doing so, the Market should place a particular focus on opportunities for entrepreneurship, employment and education in the local area.

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## **HEALTH**

The availability of good food is essential to public health and wellbeing. Throughout the developed world, diseases linked to diets dominated by heavily processed, highly calorific foods are on the rise. The impacts of this obesity epidemic are not evenly distributed, with poor diet being both a symptom of economic inequality and a factor in its growth. Borough Market should provide the opportunity for people of all backgrounds to buy the fresh ingredients and minimally processed products that underpin a healthy diet. It should also support food education and the development of cooking skills, particularly in disadvantaged communities.

The Market should avoid making binary judgements as to whether entire categories of food are 'healthy' or 'unhealthy' – the consumption of a cake is not a bad thing as long as the cake is well made and the consumption not too frequent. By preventing the sale of ultra-processed foods and following the precepts of this policy relating to quality and transparency, the Market should seek to ensure that the more calorific foods sold on its estate are less harmful than their industrially produced equivalents. It should also balance its trader base and communications in ways that promote a varied, nutritious diet.

- Borough Market should explicitly avoid the sale of ultra-processed foods, regardless of their calorie level.
- The Market should favour approaches to food production that minimise the use of chemical pesticides, fungicides and antibiotics.
- The Market should not promote 'superfoods' and faddish diets. Unsupported claims about the health benefits of individual ingredients should not be made either in the Market's communications or those of its traders.
- The foundations for good health are laid early in life, so the Market should act to meet the needs of babies and mothers, and find means to improve children's health, broaden their diets and set them up with useful cooking skills.

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## VARIETY

The application of this food policy would be much simpler if Borough Market were to narrow its offering, but that would be contrary to the commitment to variety that differentiates us from regular farmer's markets, allows competition with supermarkets, and reflects the multiculturalism of London. This should not be taken too far – some direct competition between traders can be beneficial for the quality, pricing and presentation of the stalls – but it should remain an important aspect of the Market's identity.

- Borough Market should be a place for both British and international food.
- Borough Market's overall food offering should be reflective of the ethnic and cultural diversity of its local community, and of London as a whole.
- Borough Market should provide foods that are rare or unique, including those that support the survival of traditional skills and heritage breeds. If the same item from the same producer is widely available through numerous high street or online retailers, potentially at a lower price, it is questionable what value its presence at the Market brings to the public.

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## ACCESSIBILITY

One of the biggest challenges that the Market must address is how best to serve all members of its community rather than just those with high incomes. 'Cheapness', however, should not be an aspiration. High-quality food produced in a way that fits with the principles of this policy is not cheap. (Industrially produced food is not really cheap either, but its vast social and environmental costs are forced upon a wider constituency than the end consumer.) At Borough Market, pricing should be fair and not inflated, but it is essential that it reflects the true costs of its production and the need for all people in the supply chain to receive an equitable reward for their skill and endeavour.

- The Market should ensure that it offers a balance between basic ingredients and luxuries – shoppers should be able to buy a single onion or a single egg.
- The Market should seek to educate shoppers about seasonal price variations and the availability of more affordable but lesser known fish and cuts of meat.
- Shoppers should be given the necessary information to extract maximum value from their purchases.
- By making use of external sources of funding, such as the government's Healthy Start scheme for low-income parents, the Market should attempt to find ways to make some foods available at a lower price to people in the local community who would otherwise be excluded.

Other barriers to shopping at Borough Market should also be broken down:

- The Market should sell a range of foods that reflects the diversity of its community.
- This diversity should also be reflected in how and by whom the Market's food offering is promoted to people from different ethnic and socioeconomic backgrounds.
- The estate should always be accessible to shoppers who want to buy produce as well as tourists and experience seekers.
- Visitors with specific needs, including people with disabilities and the parents or guardians of infants and young children, should have the opportunity to shop here and be supported in doing so.
- While the social benefits of visiting a marketplace should be promoted, the Market should provide access to Borough Market food to people who are unable to come here in person.

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# PART THREE: PROCESS

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**“MANY OF THIS POLICY’S PRINCIPLES CAN ALREADY BE SEEN IN PRACTICE, BUT THERE IS WORK TO BE DONE IN THE COMING YEARS TO ENSURE THEY ARE APPLIED MEANINGFULLY, CONSISTENTLY AND TRANSPARENTLY ACROSS THE ENTIRE ESTATE”**



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## HOW WAS THIS POLICY CREATED?

The creation of this food policy has taken place over two distinct phases.

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### PHASE ONE

In 2019, a project was initiated to research and draft a food policy, led by David Matchett, the Market's then Head of Food Policy Development. Ellie Costigan, who has an MSc in food policy from City University and was then Managing Editor at LSC Publishing (the team behind Market Life magazine), was commissioned to support David in carrying out research and conducting interviews.

Research for the food policy began with a comprehensive literature review and attendance or participation at a series of conferences in 2019, including attending sessions on food policy implementation at the City University Food Symposium, running a focus group on the meaning of food quality at the Oxford Food Symposium, and providing an introduction to food policy and a group discussion of food quality at the Borough Market Trader Conference.

At the start of 2020, all Borough Market traders were invited to complete an online questionnaire, which asked them to score a series of statements relating to food quality and rate the usefulness of existing national or international certification schemes. A similar questionnaire, but tailored to the audience, was sent to members of the Borough Market Cookbook Club and the faculty and students at the City University Food Policy department. Traders and members of the Market management team were also invited to participate in a one-on-one interview or a multi-person focus group.

— 58 traders responded to the questionnaire

— 12 traders and five members of the Market management team took part in interviews or focus groups

The Covid-19 outbreak, followed by David Matchett's departure from the Market as part of a subsequent management restructure, resulted in the project being paused in summer 2020.

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### PHASE TWO

The project was restarted in November 2021, led by two trustees with considerable experience in the development of food policies:

— Shane Holland, Executive Chairman of Slow Food in the UK

— Claire Pritchard, CEO of the Greenwich Co-operative Development Agency and Chair of the London Food Board

They were joined in a working group by Kate Howell, Director of Communications & Engagement, Lucy Charles, Interim Director of Operations, and Jane Swift, Interim CEO, with drafting assistance from Mark Riddaway of LSC Publishing.

In January 2022, the board of trustees and the Market's executive team came together for a panel discussion, exploring why having a food policy is important, what kind of shape it should take, and what some of the key challenges would likely be in making it work. This was hosted by Angela Clutton and introduced by Carolyn Steel, author of *Hungry City* and *Sitopia*, two books that explore the relationship between food and cities. As well as contributing to the discussion, all attendees were afterwards invited to record their thoughts on the direction of the food policy through an online survey.

Based on this discussion, the subsequent survey feedback and the accumulated research from phase one of the project, the working group met several times to draft, review and amend the policy.

The policy in its current form was presented to the board of trustees in July 2022, and its formal adoption was ratified.

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## HOW WILL THIS POLICY BE IMPLEMENTED?

It is worth restating that this policy defines what Borough Market food *should be*. Many of its principles can already be seen in practice, to a greater or lesser extent, but there is much work to be done in the coming years to ensure they are applied meaningfully, consistently and transparently across the entire estate. The trust's aspiration is that within five years of its publication the policy will provide a fully accurate reflection of the food at Borough Market. While some operational changes will be quick to implement, others will take time to discuss, define and deliver, and will involve considerable input from a range of stakeholders, including trustees, traders, staff and external experts.

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## FOOD STANDARDS

One of the trust's more complex tasks will be to produce a set of detailed food standards. The trust will begin by establishing a steering group tasked with defining food standards for each category of food, setting a timeline for those standards to be phased in, and creating practical, equitable systems for assessing compliance. Once agreed and implemented, these standards will apply to all traders, including produce traders, catered food traders and guest traders.

The steering group will be drawn from:

- Trustees
- Traders
- Members of the management team
- External experts

The steering group is expected to be established in Q3 2022. After terms of reference have been agreed, detailed consultations will begin in 2023. In its consultations, the group (or subcommittees of the group) will draw upon further expertise from within the trader community, specific to the category under discussion.

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## STRATEGIC PLANNING

Starting immediately, this policy will also begin to inform the trust's strategic planning. Borough Market's draft strategic framework is built upon three central pillars: Food, Place and Voice. The principles of the food policy will drive our approach to Food, and will also have a significant bearing on the creation of strategies that relate to the other two pillars, as well as areas such as Sustainability and Equity, Diversity & Inclusion.

Several of our existing processes and policies will need to be adapted to bring them into line with the food policy. Its principles will need to be embedded in, for example, the trader application process, staff training and performance management, and the trust's conditions for letting its properties.

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## REVIEW

This policy is not set in stone. Future iterations will be updated to include the agreed food standards. The principles and standards will be subject to regular review by the trustees to ensure they remain fit for purpose in a rapidly changing social and political landscape.

The review cycle will begin once the food standards set out by the steering group have been formally adopted and added to the policy. Reviews will then take place every two years.

Any updates to the policy will be shared with stakeholders, and the new policy document will be made available through the Borough Market website.



