



**Glasgow Food Policy Partnership
Response to the Scottish Government
Good Food Nation Bill Consultation, March 2019**

Our answers to the four specific questions in the consultation are below.

1. To what extent do you agree with the framework proposals for Ministers and public authorities to prepare statements of policy, have regard to them in that exercise of relevant functions, and report on implementation, with regard to international obligations and guidance?

ANSWER: We strongly agree.

We support the Government to take action to support the right to food. The suggestions laid out in the consultation are helpful, but we wish to see the Scottish Government being clear and explicit that this Bill will put the right to food in law. Doing this will help them meet Scotland's international obligations, and also assure the Scottish public that the food system here in Scotland is rooted in, and coherent with, the environmental and social justice agendas that are not just priorities but that are necessities for the wellbeing of future generations.

It is important that Ministers and other public authorities are guided by strong food policies and use them to guide their ongoing work across the spectrum of related policy and practice; the Good Food Nation policy should provide a framework for all parts of the food system including, for example, policies to reduce food insecurity, agriculture and health improvement. We also feel strongly The Good Food Nation Policy should not just influence new policy but also that it should be linked to existing policies that include food such as the Obesity Strategy published in 2018, as well as any policies including food procurement, sustainability and healthy eating ('High Salt Fat Sugar' and 'Out Of Home Food Environment' for example).

It is also important that the Government and public bodies involve many different groups and individuals in making their plan, because food is everyone's business. They should do this in a way which makes it easy for the public to understand the situation and have their voice heard.

We also feel that Local Authorities have a role to play and that Scottish local authorities might benefit from having their own formal Food Policies. Glasgow City Council is currently putting together a Food Strategy group and recently held a consultation on [Food Inequality in the City](#). Some Scottish Councils

already have a formal food strategy in place including Forth Valley & Lothian and Dumfries & Galloway.

The Scottish Government has already written national food policies. While these have been a good start, they have not been very effective and have not had cross-governmental or cross-departmental influence. In 2014, the Government published *Becoming a Good Food Nation* - a national food and drink policy that included an inspiring vision for the future of Scotland's food. However, progress has been slow because the plan was not specific enough about who would do what. Businesses and other parts of Government could choose whether or not to follow the policy, and there was no timetable for reporting or clear indicators of success.

Rather than one overall plan for food - we have plans which focus on one issue, like the Climate Change Plan, Diet & Obesity Plan and Food and Drink Industry Plan. Without bridging the gaps between these areas then we cannot see the whole picture or solve the problems that we are facing.

In the face of the health, environmental and economic challenges we are facing that relate to food, it is important that this time we develop a policy that enables a coherent, consistent and strategic cross-government framework that guides future policy and practice on all aspects of the food system

For example, the Good Food Nation plan would have been much better if more people like scientists, farmers and those forced to visit foodbanks were involved in writing it. The plan would also have been better had more people been involved in reviewing the plans, judging them and changing them if needed.

2. Whilst we do not plan to require all sectors to prepare statement of policy on food, they do all have a role to play in achieving our Good Food Nation ambition. To what extent do you agree that Government should encourage and enable businesses in particular to play their part?

ANSWER: We strongly agree.

To succeed in making Scotland a Good Food Nation, we need everyone who has a role in food to play their part. Private businesses have a big role in our food system – they grow, process, package, ship, sell and/or prepare our food every day. We will need their support to make the changes needed to improve the positive impact of food on our health, our environment and on our prosperity. We believe the Government should encourage and support private businesses to help achieve the Good Food Nation ambition.

The Scottish Government can do a lot to encourage businesses to help us meet these goals. For example, they can offer financial support to businesses which make changes that support the GFN ambitions, and they can make rule that limit or discourage business decisions and practice that make

it harder to meet these goals.

Involving private business in achieving these goals should mean all businesses - small businesses, like local green grocers and farmers, as well as large food businesses. They must all pitch-in to make the Good Food Nation vision a reality. The Government should lead by example and use its power to encourage positive changes in food businesses.

The Government has used its power to support and encourage the business sector to change in the past, and it has been very helpful. For example, in 2014 the Government established the carrier bag charge, which requires all shops in Scotland to charge a minimum of 5p for each single-use carrier bag. This led to an 80% reduction in the number of bags that shops have handed out, many of which would have ended up polluting the environment and threatening wildlife. This is just one example. The Government has also used its powers to introduce a minimum price on alcohol and a tax on sugary drinks to tackle health issues. Perhaps other taxes could be introduced to make it less attractive for food businesses to produce/serve unhealthy foods. Government grants could also be used to support businesses to produce food at a more local, more sustainable way instead of relying on exported food. This in time could lead into a cultural food change similar to the one that has happened in the Nordic Countries: <https://www.norden.org/en/information/new-nordic-food-manifesto>

Many businesses have already realised the need for change. With support from the Government, more businesses will join together to tackle the problems facing our food system.

3. To what extent do you agree with the proposed approach to accountability of Scottish Ministers and specified public authorities?

ANSWER: We strongly disagree.

The issues that Good Food Nation addresses are hugely important: for our population health, for our environment, and for our food security.

Reporting only to the Parliament and Scottish Ministers is not a strong enough way of ensuring we make Scotland a Good Food Nation.

The food system is complicated and made up of many parts of Government, as well as individuals and companies. Everyone involved in the food system has different goals and priorities, and at the moment, we do not have a full view of how well the problems facing the food system are being tackled.

We need an independent organisation, which is not the Government, to review and ask questions about the Government's plans, provide guidance, gather evidence, and report on how well the Government is delivering on its plan. This group should be an independent statutory body with a role in protecting everyone's right to food by making sure the Government keeps its promises. They would provide the expertise needed to achieve our ambitious Good Food Nation vision and assure the Scottish public in an open and transparent way (and one that is adopted in many other policy areas) that this is being done effectively, and without compromise or corruption.

Other important laws have included setting up independent statutory bodies to make sure the Government is delivering its promises. For example, the Scottish Land Commission was set-up by the Land Reform (Scotland) Act 2016. It has the power to review the impact and effectiveness of any Government plans on ownership of land and land rights, recommend changes to these plans and to provide information and guidance. The Poverty and Inequality Commission is another good example. It was set up by the Child Poverty (Scotland) Act 2017 to provide independent advice to Government on reducing poverty and inequality in Scotland and to examine progress that is being made.

Food is important and complex enough to need a Commission like these. If a Food Commission was set up, it could include experts (in food systems, nutrition and environment to name a few), members of the public, as well as people with 'lived experiences'.

4. To what extent do you agree with the proposal for targeted legislation relevant to specific policy areas as an alternative to a single piece of legislation?

ANSWER: We strongly disagree that only targeted legislation that is relevant to specific policy areas is all that is required.

We believe that the Good Food Nation Bill should be framework legislation and that it should be supported by targeted legislation where necessary and appropriate. It will be important to get the framework legislation right, so it does a good job of guiding targeted legislation across the wide range of relevant policy areas in the future. Framework legislation needs to have a strong commitment to the right to food, so all future targeted legislation takes full account of human rights.

Both framework legislation and targeted legislation are required to realise the Good Food Nation ambition, and they should work together and strengthen each other: framework legislation is also required to set up the principles, structures and guidelines that shape the whole food system; and targeted legislation will, following the guidelines set out in the framework legislation, tackle specific issues like reduction of food waste or recycling.

This is not a new idea; the Scottish Government has supported system-wide approaches before: they signed up to the UN's Sustainability Development Goals (SDGs) in 2015. The SDGs are a set of 17 goals

that provide a plan to address global challenges related to poverty, inequality, climate, environmental degradation, peace and justice. The SDGs are connected to make sure no one is left behind and the approach to tackling issues is joined-up.

The Good Food Nation Bill should also include statutory targets to drive change in key areas, like the targets in the Climate Change Act. We believe targets should include, for example:

- Halving of moderate to severe household food insecurity by 2030
- Halving childhood and adult obesity by 2030
- Halving the environmental impact of the food system, including halving food waste by 2030
- All workers in the food sector paid at least the living wage and included in collective bargaining agreements by 2025

Concluding comments

As a nation, Scotland's population health trends show an alarming lack of improvement in food-related health statistics, including high rates of children and adults who are overweight or obese or with diabetes or prediabetes, and growing levels of household food insecurity and emergency food aid requirements. Internationally, our collective future is threatened by our inadequate action on carbon emissions to address climate change. Not only does our food system contribute to around 30% of carbon emissions, but climate change is likely to threaten our future food security. The food system and its impacts are interconnected and interdependent: we need to change our food system and improve its positive impact on our population health, our environment and our economy, and we need to do so urgently. This Good Food Nation Bill is a vital part of making this happen.