

## Response ID ANON-1HUD-QKT7-S

Submitted to Good Food Nation (Scotland) Bill - call for views

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### About you

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2 How your response will be published

I would like my response to be published in its entirety

3 What is your name?

Name:

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4 What is your email address?

Email:

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5 Are you responding as an individual or on behalf of an organisation?

Organisation

### Organisation details

6 Name of organisation

Name of organisation:

Glasgow Food Policy Partnership (GFPP)

7 Information about your organisation

Please add information about your organisation in the box below:

GFPP is a group of public, private and voluntary sector organisations who have come together with one specific objective. We believe that a fairer, healthier, more sustainable and resilient food system would make Glasgow a better city to live in. Our partners include public, private and voluntary sector organisations. In the last couple of years our membership has grown to include partners representing business, food re-distribution and ethnic minorities. A full list of partners is available here: <http://goodfoodforall.co.uk/about-us>

In June 2021, GFPP and its partners launched Glasgow City Food Plan, a comprehensive 10-year food plan for the city developed by a team comprising GFPP, Glasgow Centre for Population Health, Glasgow City Council, Glasgow Health and Social Care Partnership, NHS Greater Glasgow and Clyde and Glasgow Community Food Network. You can read the plan here:

[https://www.gcph.co.uk/assets/0000/8206/FINAL\\_GLASGOW\\_CITY\\_FOOD\\_PLAN\\_\\_June\\_2021\\_.pdf](https://www.gcph.co.uk/assets/0000/8206/FINAL_GLASGOW_CITY_FOOD_PLAN__June_2021_.pdf)

In June 2021 Glasgow was awarded Sustainable Food Places (SFP) Bronze Award recognising the success of taking a joined up, holistic approach to food and achieving significant positive change on a range of key food issues. GFPP hopes to build on this work and engage with even more organisations and businesses to help us make Glasgow's food system better for everyone. More information about the SFP network is available here:

<https://www.sustainablefoodplaces.org/>

More information about GFPP can be found on our website: <http://goodfoodforall.co.uk/>

### Your views

8 What is your view about the scope of the Bill? What else, if anything, would you have liked to see included in the Bill? Please explain your reasons.

Please provide your response in the box provided.:

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. This could be done by offering incentives/financial support to businesses of all sizes

who make changes that support the GFN ambitions eg. to produce food at a more local, more sustainable way instead of relying on exported food. We would also like to see greater support to enable locally produced food to be procured by the public sector in order to maximise the benefit of the investment in food for the local economy. With support from the Government small producers, businesses and the public sector can work together to tackle the problems facing our food system.

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. 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/advertising bans could also be introduced to make it less attractive for food businesses to produce/serve unhealthy and unsustainable foods. 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>

We would also like to see clear recognition of the central importance of our food system to protecting and improving our environment, our food security and our health, and the responsibilities of the Government and others to making sure the right to food is respected, protected and fulfilled. The new bill should provide a framework that enables a coherent, consistent and strategic cross-governmental approach to policy and practice on all aspects of the food system.

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 pre-diabetes, and growing levels of household food insecurity and emergency food aid requirements. In addition, the COVID-19 pandemic, Brexit and climate change impacts have further threatened our food security. Our food system contributes to around 30% of carbon emissions making the food system and its impacts interconnected. Because of all these factors 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.

9 What is your view of the decision not to incorporate the 'right to food' into Scots law through the Good Food Nation Bill? Please explain your reasons.

Please provide your response in the box provided.:

We support incorporating 'right to food' into Scots law whether it's through the Good Food Nation Bill or the separate Right to Food Bill; however, it's important that if separate the bills are linked in some way. By doing this will help them meet Scotland's international obligations, and also assure the Scottish public that the food system in Scotland is rooted in, and coherent with, the environmental and social justice agendas that are not just priorities but necessities for the wellbeing of future generations. Having a right to food in Scottish law would mean the Scottish Government would have to ensure its policies are not negatively impacting people's right to food.

If the Bill does not mention the right to food, then it could lead to an odd situation in the future in which key legislation on food policy is not specifically formulated under existing commitments to advancing the right to food under International Human Rights Law. The Scottish government is already under obligations with regard to economic, social and cultural rights as the UK is a signatory to the International Covenant on Economic Social and Cultural Rights 1966, so the Bill could reference this commitment and express the further intention to develop specific legislation in the form of the Human Rights Bill for Scotland. The Good Food Nation Bill could state that the policies formulated as part of the Good Food Nation will need to be interpreted in line with forthcoming legislation that incorporates the right to adequate food into domestic law.

This could also be an opportunity to stress the importance of developing accountability mechanisms to ensure that the right to adequate food becomes a meaningful element of law and policy-making. The lack of an overseeing body for the Good Food Nation bill (POINT 13) is not an inspiring precedent, so it would be useful to stress that accountability mechanisms for the Scottish human rights bill must be developed that are able to review and offer accountability for policies made under the Good Food Nation Bill, otherwise this can lead to the creation of an accountability gap. Scottish Ministers and policymakers must ensure that suitable accountability mechanisms that can hold both public and private bodies to account with regard to taking actions that impact on the enjoyment and protection of human rights are implemented.

Additionally; at this stage it remains unclear what it means in practice for the right to adequate food to be translated into Scots Law. Could policy makers set out a clear to offer a clear and reliable account of what changes in legal frameworks mean for people in practice in order for important constitutional changes to enjoy legitimacy?

It should also be underlined that whatever the form of implementing legislation that is brought in to give domestic effect to International Human Rights Law in Scotland, it is insufficient only to give effect to Article 11 of the ICESCR in order to advance the protection of the right to adequate food and to ensure its effective realisation. Scottish legislation on advancing the right to food must reflect also the interpretative guidance for the right to adequate food that is set out in General Comment 12 of the UN Committee on Economic, Social and Cultural Rights (CESCR) (<https://www.refworld.org/docid/4538838c11.html>). It could be useful to seek a consultation with the UN Special Rapporteur to ensure that Scottish legislation for implementing the right to adequate food is in line with best practice.

10 How should the Bill and/or the Good Food Nation plans link to other food policy initiatives, for example the current process of producing a Local Food Strategy, and addressing global impacts of food and drink supply chains – for example taking up any of the Global Resource Initiative recommendations?

Please provide your response in the box provided.:

We feel that The Good Food Nation Bill should clearly guide other food policy initiatives such as 'The Local Food Strategy' and 'Ending The Need for Foodbanks' national plan, as well as any future policies including; land use, sustainable food production, food procurement, food access, nutrition and

health.

The Scottish Government has already written many 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 to follow the policy or not, and there was no timetable for reporting or clear indicators of success.

Rather than one overall plan for food – Scotland currently has plans which focus on one issue such as 'Diet & Obesity Plan' and 'Food and Drink Industry Plan'. A whole system approach is needed to allow us to see the whole picture and to solve the health, environmental, social and economic challenges relating to food. It is therefore important that this time we develop a legislation that enables a coherent, consistent and strategic cross-government framework that guides future policy and practice on all aspects of the food system under the same umbrella (including land use, growing, harvesting, animal welfare, processing, procurement, marketing, selling, preparing, cooking and eating food, and reducing and disposing of food-related waste). Going forward it should ensure that our national approach to food is joined-up and that we move forward on all issues that influence the food system working towards the same priorities.

GFPP endorses the recommendations of the Global Resource Initiative. This is a fundamental part of transforming the food system and promoting sustainable supply chains. There are many excellent recommendations in the Global Resource Initiative Final Recommendations Report (2020), but two examples include the following:

- The government creates a sustainable commodity import guarantee scheme in order to reduce the cost of trade finance for sustainable agricultural production. By creating a cost differential for sustainably sourced commodities as compared with conventional commodities, a sustainable commodity import guarantee scheme could provide a powerful incentive for more companies to adopt sustainable practices and embed processes that verify the sustainability of their supply chain.
- The government urgently introduces a mandatory due diligence obligation on companies that place commodities and derived products that contribute to deforestation on the UK market and to take action to ensure similar principles are applied to the finance industry. The mandatory due diligence obligation should require companies to analyse the presence of environmental and human rights risks and impacts within their supply chains, take action to prevent or mitigate those risks, and publicly report on actions taken and planned. The financial sector should also be covered by a similar mandatory due diligence obligation, requiring them to exercise due diligence in order to avoid their lending and investments funding deforestation.

The Good Food Nation plan should be carried out in dialogue with these important recommendations on the global implications of agricultural policy and food procurement.

11 What outcomes, indicators and policies should Scottish Ministers and 'relevant authorities' include in their Good Food Nation plans? Please explain your reasons.

Please provide your response in the box provided.:

The Good Food Nation Bill and any plans linked to it should include binding statutory targets to stimulate immediate action on some of the key challenges of our food system. We believe targets should include, for example:

- % Reduction in household food insecurity
- % Reduction in adult and childhood obesity
- % Reduction in greenhouse gas emissions from the food system (including food waste)
- % Increase in the proportion of food and drink businesses paying the Real Living Wage
- Any other issues aligned with the Sustainable Development Goals, which The Scottish Government signed in 2015. For example, some of the important targets and indicators that are relevant to the Good Food Nation Plan set out under SDG GOAL 2 on ZERO HUNGER. Some of these relate to Scotland's international responsibilities in addition to its targets for its own territory and population:

2.1 By 2030, end hunger and ensure access by all people, in particular the poor and people in vulnerable situations, including infants, to safe, nutritious and sufficient food all year round.

2.2 By 2030, end all forms of malnutrition, including achieving, by 2025, the internationally agreed targets on stunting and wasting in children under 5 years of age, and address the nutritional needs of adolescent girls, pregnant and lactating women and older persons.

2.3 By 2030, double the agricultural productivity and incomes of small-scale food producers, in particular women, indigenous peoples, family farmers, pastoralists and fishers, including through secure and equal access to land, other productive resources and inputs, knowledge, financial services, markets and opportunities for value addition and non-farm employment.

2.4 By 2030, ensure sustainable food production systems and implement resilient agricultural practices that increase productivity and production, that help maintain ecosystems, that strengthen capacity for adaptation to climate change, extreme weather, drought, flooding and other disasters and that progressively improve land and soil quality.

2.5 By 2020, maintain the genetic diversity of seeds, cultivated plants and farmed and domesticated animals and their related wild species, including through soundly managed and diversified seed and plant banks at the national, regional and international levels, and promote access to and fair and equitable sharing of benefits arising from the utilization of genetic resources and associated traditional knowledge, as internationally agreed.

2.A Increase investment, including through enhanced international cooperation, in rural infrastructure, agricultural research and extension services, technology development and plant and livestock gene banks in order to enhance agricultural productive capacity in developing countries, in particular least developed countries.

2.B Correct and prevent trade restrictions and distortions in world agricultural markets, including through the parallel elimination of all forms of agricultural export subsidies and all export measures with equivalent effect, in accordance with the mandate of the Doha Development Round.

2.C Adopt measures to ensure the proper functioning of food commodity markets and their derivatives and facilitate timely access to market information,

including on food reserves, in order to help limit extreme food price volatility.

All policies must declare a clear process for monitoring and accountability. It is vital that a robust system for monitoring progress is put in place that provides independent scrutiny and transparency.

12 The Bill requires that Scottish Ministers and 'relevant authorities' must, when exercising a specific function or a function falling within a specific description, have regard to the national good food nation plan. Those "specified functions" will be set out in secondary legislation. In your view, what should those functions be? Please explain your reasons.

Please provide your response in the box provided.:

Due regard for the Good Food Nation Plan should be held by Scottish Ministers and relevant authorities both when they are developing, implementing, and reviewing laws and policies, and when they are approving actions by staff or authorising expenditures that intersect with access to affordable and adequate food (broadly conceived). It is particularly important that these obligations are met when Scottish Ministers and relevant authorities are developing, implementing, or approving measures relating to agricultural production, trade, supply chains, investment, procurement, and economic development, but it must also extend to other aspects of the political economy, including the provision of welfare, labour and housing markets, health and education. Consideration of the Good Food Nation Plan should further inform how Scottish Ministers and relevant authorities regulate and determine the scope of the entitlements of private actors (landowners, developers, business owners, supermarkets, retailers etc).

13 The Bill does not provide for a body to oversee how the Scottish Government and 'relevant authorities' are implementing the Bill; what is your view on this? Please explain your reasons.

Please provide your response in the box provided.:

We don't agree with this approach. We think the Scottish Parliament should establish an independent commission which will have the authority to oversee the implementation of the Good Food Nation Bill. This commission would facilitate public participation in food policy and be charged with ensuring all policies respect the right to food. Establishing the core purpose of the food system in law, with a system of governance that ensures progress and accountability, can catalyse a transformation in how our food system works.

The issues that the Good Food Nation Bill 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 this. 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 experience'.

14 What impact will the Bill have for local authorities and health boards?

Please provide your response in the box provided.:

Local authorities would be required to publish A Good Food Nation Plan and use this as a guide when preparing their own plans. Glasgow launched its own 10-year Glasgow City Food Plan in June 2021 developed by a multidisciplinary team including Glasgow City Council and NHSGGC. It took the team 2 years to develop the plan and during the development the plan was widely consulted on. We would welcome a move to link any existing plans to the Good Food Nations Plan and to have additional funding available to deliver the GFN vision at the local level. We think it is also important for local authorities and health boards to work together to deliver any new plans to ensure shared vision and goals.

15 Does the Bill provide for opportunities to participate in the production of national and local good food nation plans? You may wish to consider, for example, how the views of vulnerable people or those whose voices are seldom heard would be sought.

Please provide your response in the box provided.:

It is important that the Government and public bodies involve many different groups and individuals in making their plans, because food is everyone's business. It should be done in a way which makes it easy for the public to understand the issues around food and have their voice heard. An easy-to-read summary document might be more suitable for general public than a lengthy policy document.

Events organised by community groups and food banks might provide a good, relaxed setting for vulnerable and marginalised groups to voice their opinions. Funding to organise these events should be provided to cover cost of venue hire, staff and food.