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Submitted to Good Food Nation Proposed National Plan
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3 What is your name?

Name:
Glasgow Food Policy Partnership

4 What is your email address?

Email:
jill.muirie@glasgow.ac.uk

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

Organisation

Organisation details

1 Name of organisation

Name of organisation:
Glasgow Food Policy Partnership

2 Information about your organisation

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The Glasgow Food Policy Partnership (GFPP) is a group of public, private and voluntary sector organisations which have been working together since 2015. The GFPP developed and now coordinates delivery of the 10 year Glasgow City Food Plan which was launched in 2021. The plan aims to improve coordination and collaboration between partners, and to accelerate progress towards a more sustainable, fair and healthy food system in Glasgow where more environmentally friendly, nutritious food is available to everyone in an equitable way. The GFPP is hosted by the Glasgow Centre for Population Health and is part of the UK wide Sustainable Food Places (SFP) network.

This response is supported by our partners. A list of our partners is available at: <http://goodfoodforall.co.uk/>.

Questions

1 Thinking about those aspects of the Proposed National Good Food Nation Plan related to public health, health services and social care, what, if any, specific changes would you like to see reflected in the finalised national plan?

Please provide your response in the box provided.:

We welcome the GFN National Plan and its recognition of the importance of our food system for health, equity, the natural environment, the economy, local communities and individual wellbeing. We welcome the emphasis on the role that food plays in our family and social interactions and the enjoyment that good food can bring. We agree that the current food system is not working as well as it should, particularly in providing everyone with the nutrition they need, but also in terms of its impact on the environment and local economies. We welcome the recognition of the complexity of our food system and the interconnectivity of so many of the issues that need to be addressed. We are delighted to see this first National Plan seeks to work across the food system and the related policy areas. We welcome the opportunity this presents to work together across sectors and policy areas and with other relevant authorities.

The Good Food Nation Plan presents the opportunity to link to the Population Health Framework, where there is a clear focus on improving healthy weight through actions to support a healthier diet and physical activity, and working collectively to build healthier environments. We would like to see this link with the PHF made more explicit.

We welcome the recognition that obesity and associated long term conditions are responsible for significant health inequalities across the Scottish

population, and the acknowledgement that this reflects poverty, deprivation and issues of food insecurity. We welcome the inclusion of the food inflation indicator, but would also like to see the addition of an indicator that tracks the cost of a healthy diet/healthy basket and allows comparisons to be made to average incomes across income deciles.

We would like to see more recognition of the complexity of food insecurity; while primarily caused by inadequately low incomes, it is exacerbated by issues of accessibility, as well as premium pricing of food in areas where accessibility is low. The Plan does not recognise the issue of food accessibility – in many parts of Scotland, both in deprived urban areas and in remote, rural areas, there is limited if any access to affordable, nutritious foods, particularly for those without access to a car or with mobility issues. We would like to see the Plan recognise the importance of increasing access to healthy, affordable food within local communities, ideally by incentivising and investing in local initiatives and enterprises rather than reliance on surplus food redistribution.

We think the Plan misses an opportunity to recognise the impact of quality of diet on health outcomes, particularly the achievement of Scottish Dietary Goals (as very little progress has been made in achieving these since monitoring began in 2013), although we welcome indicators 3A1-3. We also believe there is insufficient focus on the quantity of Ultra Processed Foods (UPFs) within the diet; particularly those foods associated with high fat, sugar, salt which impact on obesity and other health outcomes. UPFs currently make up more than half the average shopping basket, and two thirds of children's daily energy intake (UK) and a measure driving a reduction in high fat, sugar, salt UPFs would be welcomed.

We would like to see the importance of increasing plant-based foods in the diet both for health and for the environment - data on this from the Scottish Climate Survey could be added as an indicator under outcome 3 and/or 5.

We would like greater recognition of the importance of increasing accessibility of culturally appropriate foods, particularly as the diversity of Scotland's population increases.

Whilst outcome 5B.2 provides useful information about the Food for Thought Education Fund, the Plan misses the opportunity to strengthen the importance delivering food education across the curriculum (including food technology/home economics) and the impact it could have on both population food literacy and cooking skills, and on employment within the hospitality and food and drink sectors. This would support outcome 3 by increasing skills in cooking healthy meals and outcome 4 to improve the quality and reputation of Scottish restaurants, hotels and businesses.

Whilst we recognise the limitations of BMI in assessing individual level health, particularly in children and in diverse communities, we believe that the population level Primary 1 BMI measurements, which are currently part of child health surveillance, would be a more robust indicator of population level trends in child healthy weight than the survey data proposed (indicator 3B4).

We note the limited mention of breastfeeding and suggest including breastfeeding in the indicators for Outcome 3.

In terms of sub outcome 3D, consider including a measure of the number of eating disorder inpatients in the absence of national data about diagnoses in all settings. This is collected by PHS.

2 Thinking about the role of local government in delivering the Plan, particularly through procurement, what, if any, specific changes would you like to see reflected in the finalised national plan?

Please provide your response in the box provided.:

It is important to note the 'relevant authorities' required by the Act to develop and deliver local Plans includes health boards as well as local government, and this should be reflected in the National Plan. The actions of both types of relevant authority will impact on the same populations in defined geographical areas, so it will also be important that the Plan outlines how both organisations are expected to work together so that their respective Plans are complementary and mutually supportive.

As the food system is also influenced by stakeholders beyond local authorities and health boards it will be important that mechanisms are adopted to enable a collective and collaborative approach to developing, delivering and reviewing local Plans. Sometimes this will require collaboration across relevant authority boundaries and the National Plan should recognise the challenges that this brings.

We would like to see more focused and tangible support for the relevant authorities (and their local partners) who will have to develop and operationalise the local plans on the ground. In particular, recognition of the challenge of working across multiple policy domains and with many stakeholders, the importance of collaboration, and the time and resources needed to build and maintain effective and productive partnerships. We would also like more clarity in how national and local action relating to the GFN will be 'joined up'. Working with an established network, like the Sustainable Food Places Network in Scotland could help, and we suggest this is considered.

It should also be noted that the current National Plan stands alone, and it is as yet unknown how the various local Plans will intersect and overlap to create systemic change. We would like to see the National Plan include measures and mechanisms that show a commitment to collaboration in the development of local Plans, and explicitly encouraging public bodies to be building on the existing work of the local food plans and food partnerships that have been driving local change.

We welcome the inclusion of the Soil Association Scotland's Food for Life Served Here (FFLSH) award, and the number of FFLSH meals served, as an indicator under Outcome 5 (Primary Indicator 5B1). However, we believe that the cross-cutting nature of the programme – which delivers benefits for local producers and rural economies, community wealth building, public health, food education and sustainability – warrants consideration of FFLSH being used as a metric under more than one outcome. The key focus of the Food for Life programme is getting more fresh, sustainable and local food onto plates across the public sector, which includes schools, care homes, and government buildings. The Plan should recognise that this goes beyond local authorities and should include the NHS as well as Universities and Colleges. Public procurement can drive demand for and growth in more sustainable and agroecologically produced foods and deliver local socioeconomic benefits in line with the Community Wealth Building agenda. We would

like to see the National Plan include an indicator of commitment to local, organic and sustainable food utilising public food procurement as an exemplar of best practice for future systems change.

In addition to FFLSH, we would like to see alignment with the forthcoming Eating Out Eating Well scheme, which we hope will provide further incentives and support for food outlets to provide healthy and sustainable foods. We would like more clarity regarding the expectations of public sector compliance/accreditation by the Eating Out Eating Well scheme, and believe that inclusion as an indicator to support appropriate outcomes would be helpful.

We would also like more recognition in the National Plan of the actions needed to overcome public procurement barriers to change, including current procurement approaches, lack of dynamic procurement for food, as well as the need for increased investment in food processing, and investment in public food infrastructure.

There is also a need for improved supplier support to encourage smaller food businesses to be tender ready, and this needs to include new approaches to managing the risk around the current local food supply chain for the public sector to provide equity and market opportunity for those who find engaging with public sector too challenging.

Food resilience is important and there is a need to develop a clear strategy for ensuring a strong, resilient food system for people, communities and public food that withstands the global economic and environmental risks that are emerging. Whilst the inclusion of outcome 2 is welcomed, there remain gaps in suitable indicators, particularly those with direct relevance to the food system and which can be influenced at a local level. If climate change and sustainability are to be prioritised, clarity is needed in order to further articulate these measures.

3 Thinking about the aspects of the Plan on allotments and community growing, what, if any, specific changes would you like to see reflected in the finalised National Plan?

Please provide your response in the box provided.:

We welcome the inclusion and recognition of the value of community growing and allotments, both of which are important parts of vibrant communities and which contribute greatly to community and individual wellbeing. These are especially important for those with little or no outdoor space or in deprived communities, and they support skills development and community engagement. However allotments are oversubscribed in Glasgow, and community gardens are often developed and run by community organisations with short term and precarious funding which makes longer term planning, staffing and development difficult, often with insecure tenure. The contribution of Local Authority and NHS estates to increasing and supporting growing initiatives should be considered as an indicator, potentially under outcome 5. The development and review of local Food Growing Strategies (required by the Community Empowerment Act) should be linked to local GFN Plans.

We feel there is a gap in the National Plan in relation to market gardens, which offer the opportunity to provide more locally grown food with a short supply chain as well as supporting local workers and local enterprises. National support via a Market Garden Support Scheme proposed by the Soil Association Scotland should be considered, as should investing in upscaling growers through the Community Wealth Building Bill. This could contribute to both outcomes 5 and 6. In addition to this, we would like to see NPF4 leveraged to support more community and market food growing with planning powers that could require land for new developments to include food production.

4 Thinking about other aspects of the Proposed National Good Food Nation Plan (not covered above), what, if any, specific changes would you like to see reflected in the finalised National Plan?

Please provide your response in the box provided.:

It is important to ensure that the indicators are all meaningful and clear, and will help to deliver on the 'Good Food Nation' ambition. It would be helpful to consider the availability and granularity of data at local authority and/or Health Board level to align local Plans with national measures. In decisions about future investment in data collection (e.g. surveys), maintaining consistent national and local collection of key GFN monitoring data should be prioritised. The National School Health and Wellbeing Census would provide a useful tool to assess the views and food experiences of young people, particularly allowing for local level intelligence.

The focus on the community food sector and partnerships required to achieve Outcome 5 is insufficiently developed within the Plan. The requirement to include communities and Third Sector Organisations as delivery partners along with Relevant Authorities would strengthen this aspect. Community food organisations understand the cross-cutting importance of food and how poverty, food insecurity, dietary health, culture and the food environment interrelate in their impact on people and communities. Many are well established with strong and trusted relationships within their communities and a good understanding of local needs and circumstances. Community food organisations are often relied upon by public sector partners to act as delivery organisations or partners but too often depend on short term, precarious funding and dedicated but low paid employees with little job security. The community food sector would benefit from a recognition of the need for more consistent funding and investment, training and development support and greater job security as well as being considered vital partners in achieving a Good Food Nation.

We welcome the focus on consulting with communities as part of the process – but suggest there should also be some form of consultation included at the review stage? There should also be meaningful engagement of affected communities as the plan is delivered.

In Outcome 4 we would like to see this more explicitly supportive of other outcomes (and in particular health and environment). We hope that investment in, and monitoring of, Scotland's food sector will be strongly linked with both the health and sustainability outcomes. As outcome 4 currently stands, it could be achieved but in direct contention with outcomes 1 and 3. Would hope to see increased sustainable food production that focuses on fruits, vegetables and pulses. Increasing domestic production of these would improve food security and reduce reliance on imports, especially in the face of climate change and supply chain disruptions.

For Sub-outcome 4B we suggest that the number of employers in the food and drink and hospitality sectors that are registered to be 'Real Living Wage'

employers be considered as an indicator (although we recognise that it costs money to get registered).

In relation to Primary Indicator 5B.3 we would like to see some measure of food waste here and suggest that discussions with Zero Waste Scotland about what could be useful.

We suggest that further consideration be given to the association of the Scottish diet with strong stereotypes, stigma and negative perceptions — a narrative that can influence how people in Scotland experience and identify with their diet, as well as how our food offering is shaped. If the transition to a Good Food Nation is to be successful, it will be vital to engage all sectors of the population. This includes exploring strategies to support producers, manufacturers, retailers, marketeers and consumers in moving beyond these negative stereotyped narratives. With this in mind, it may strengthen the plan to: Include analysis of how local and international consumers perceive Scottish/Glasgow cuisine, identifying both barriers and opportunities; Provide insight to help food and drink manufacturers, hospitality and tourism operators, and the retail/out-of-home sector adapt their offerings to meet evolving market demands; and address the role that perception-shifting could play in supporting a healthier, more sustainable food culture. Such considerations could help the Plan better connect with real-world market dynamics while also tackling stigma and enabling a more inclusive approach to dietary change.

While we welcome the commitment to revise and refine the plan and the monitoring framework as our approach evolves nationally and locally, we would like to see more focus and detail about plans to evaluate both the implementation and the impact of the Good Food Nation Plan, and to identify and share learning from examples of good practice.

There should be clear recognition of how existing models and examples of good practice can be supported and extended to other areas, for example through the use of the Sustainable Food Places model.