

## Health and Social Care Alliance Scotland (the ALLIANCE)

Response – Scottish Government Consultation on Good Food Nation  
Proposals for Legislation, 16 April 2019



### Introduction

The ALLIANCE welcomes the Scottish Government's consultation on how best to ensure that Scotland's Good Food Nation ambitions are achieved. Transforming Scotland's food system and becoming a Good Food Nation would bring about a fairer and greener Scotland.

It would also help create a healthier Scotland. For example, at present, many of the Scottish Government's health and social care priorities are undermined by insecure access to food. Two-thirds of Scottish adults are overweight or obese (one-third have obesity) and over a quarter of children (12-15 years) are at risk of being overweight or obese (13% are at risk of obesity)<sup>1</sup>. At the same time, there is the hidden problem of malnutrition, with 1 in 10 people in the UK over the age of 65 malnourished or at risk of malnutrition<sup>2</sup>.

A healthy diet is imperative, not only in preventing the development of long term conditions, but also to supporting people to successfully self manage their long term conditions. The Self Management Fund for Scotland, administered by the ALLIANCE on behalf of the Scottish Government, has increasingly received applications for support from organisations aiming to tackle issues related to food and self management.

Obesity and malnutrition have a huge impact on peoples' lives, but also require significant resources from the health and social care budget. It has been estimated that the average annual health and social care expenditure relating to a malnourished person is £7,408 per year, compared with £2,155 for a non-malnourished person<sup>3</sup>. Malnourished people are twice as likely to visit their GP, and are more likely to be admitted to hospital and require longer stays<sup>4</sup>.

Food is also a critical issue for the estimated 788,000 unpaid carers in Scotland. For example, evidence from Carers UK's 2013 State of Caring survey found that, where

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<sup>1</sup> Scottish Government (2018). Scottish health survey 2017: volume one - main report. Online. Available from: <https://www.gov.scot/publications/scottish-health-survey-2017-volume-1-main-report/>

<sup>2</sup> Malnutrition Task force (2017). State of the Nation Report: Older people and malnutrition in the UK today. Online. Available from: [http://www.malnutritiontaskforce.org.uk/wp-content/uploads/2017/10/AW-5625-Age-UK-MTF\\_Report.pdf](http://www.malnutritiontaskforce.org.uk/wp-content/uploads/2017/10/AW-5625-Age-UK-MTF_Report.pdf)

<sup>3</sup> BAPEN (2015) The cost of malnutrition in England and potential cost savings from nutritional interventions (short version) <https://www.bapen.org.uk/pdfs/economic-report-short.pdf>

<sup>4</sup> Malnutrition Task Force (2017) State of The Nation Report <http://www.malnutritiontaskforce.org.uk/resources/stateofthenation/>

carers had significant caring responsibilities, a third (34%) of carers said that they couldn't afford to eat a healthy diet.

The ALLIANCE is one of a range of civil society organisations that together form the Scottish Food Coalition<sup>5</sup>. We support the detailed position and proposals outlined in the Coalition's separate response to this consultation.

**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 the exercise of relevant functions, and report on implementation, with regard to international obligations and guidance?**

<b>Agree</b>
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**On the statement and the duties on Scottish Ministers**

We agree with the proposals, emphasising that the 'statement of policy' should take the form of a plan with practical steps, measurable indicators, monitoring arrangements in place to track progress and specifying the capacity and resource required to deliver these actions.

Enabling legislation should specify the timescale within which the statement must be brought forward and indicators are identified. We view 6 to 12 months as reasonable timeframes in this regard.

It should also specify what the statement must contain, including (not exclusively); how the plan contributes to each of the outcome categories of the National Performance Framework, how an impact assessment will be carried out and the steps by which each of the targets on the face of the Bill will be met.

We believe that the suggested reporting cycle of 2 years and revision cycle of 5 years is reasonable. However, each revised version of the plan should be laid before Parliament for the purposes of scrutiny and approval, rather than simply 'for information' as proposed.

**On the duties for specified public authorities**

We agree that it would be helpful for public authorities to produce their own food plans, with the aim of outlining their contribution to the aims and ambitions of the Good Food Nation legislation and the national statement/plan. However, greater

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<sup>5</sup> The Scottish Food Coalition (<http://www.foodcoalition.scot/>) is a cross-sector network of organisations with a shared ambition for achieving fundamental change to secure a socially and environmentally just food system in Scotland.

clarity on the resources to be made available to them to support them to take on this additional work would be helpful.

### **On the duties on Scottish Ministers and public authorities**

The consultation document proposes that Scottish Ministers and specified public bodies would be required to collaborate to ensure a joined up approach to the delivery of a Good Food Nation. We believe that set structures and processes are required to support this to happen to the degree required, and that a statutory requirement should be placed on how this will function.

**2. Whilst we do not plan to require all sectors to prepare statements 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?**

**Strongly agree**

In doing so, it is crucial that the Scottish Government encourages and enables the full range of private enterprises that are involved in the food system, not solely large food retailers. This includes farms, crofts, fisheries, processors, social enterprises, hospitality, catering and waste management firms.

The Good Food Nation Bill should drive changes to incentives, regulation and other government-controlled mechanisms to support businesses to play their part in meeting the four headline targets identified later in our response. The Scottish Food Coalition's consultation response outlines examples of measures by which this could be achieved.

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

**Strongly disagree**

In contrast with the position set out in the consultation document, we believe that the complexity of the issue, its cross societal impacts and the need for a multi-portfolio approach necessitate the creation of an independent statutory body for overseeing the Good Food Nation policy.

We envisage that a Statutory Food Commission would provide expertise on realising the right to food, scrutinise relevant policies, report on the state of the food system,

and ensure coherence across Government. It would facilitate public participation in food policy and be charged with overseeing a democratic and rights-based approach to food.

**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?**

**Disagree**

Achieving Scotland's Good Food Nation ambition will require a unique degree of cross portfolio and cross sectoral partnership working. Part of the reason that Scotland has to date failed to realise best outcomes for many parts of our food system can be attributed to the fact that different elements are working in competition, rather than in unison.

We therefore believe that a single piece of legislation (a 'Good Food Nation Bill') is the most effective and coherent method of delivering the change that Scotland's food system requires.

We agree with the proposals of the Scottish Food Coalition that an ambitious Good Food Nation Bill would include:

1. Full incorporation of the right to food in Scots law;
2. A requirement for a comprehensive National Food Plan, which covers the full spectrum of issues related to food, from farm to fork to waste;
3. Robust targets on the face of the bill, including:
  - a. All workers in the food sector paid at least the living wage and included in collective bargaining agreements by 2025
  - b. Halving of moderate to severe household food insecurity by 2030
  - c. Halving childhood obesity by 2030
  - d. Halving the environmental impact of the food system, including halving food waste by 2030
4. Duties on public bodies; and,
5. Legislating for an independent food commission, with the power and resources to commission research, and oversee policy coherence and progress towards food system goals.

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