

Scottish Food Coalition: Written evidence on the Good Food Nation (Scotland) Bill to the Rural Affairs, Islands and Natural Environment Committee

1. 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.

Scottish Food Coalition¹ urges the RAINE Committee to consider that the Good Food Nation Bill could be strengthened by taking the below steps:

- The Bill should have a purpose clause. It has been described by the Scottish Government as 'giving practical effect to the right to food'. This primary purpose should be explicitly set out in a purpose clause on the face of the Bill.
- The Bill should set out a small number of high-level targets
- The Bill should also establish an independent Scottish Food Commission
- The Bill must lay the foundation for future relevant legislation (e.g. Circular Economy Bill, Public Health Bill, Environment Bill, Agricultural Bill etc.)

The Scottish Food Coalition ask that the Health and Sport Committee, the Equalities, Human Rights and Civil Justice Committee and the Local Government and Communities Committee input into the development of the Good Food Nation Bill, as it is entirely relevant to their remits.

As it stands the Bill's purpose as set out in the Policy Memorandum is far too narrow. This Bill should provide the framework for integrated food policy in Scotland: which is grounded in human rights; which guides existing and future food-related law and policy; which lays the foundation for building a fairer, healthier and greener food system, and which holds Government accountable for working across portfolios, nationally and locally, and for making progress against the Sustainable Development Goals to which Scotland is signed up.

The Bill must enable Policy Coherence for Sustainable Development (PCSD), reading across the whole of government (agriculture, waste, fisheries, health, environment, climate change and biodiversity, social justice, social care, animal welfare, procurement, land reform, islands, planning, skills and training, community empowerment, transport, enterprise, trade, international development and tourism).

We know the problems of the food system, in Scotland and globally. Diet in Scotland is poor and access to good food is inequitable. A poor diet, both eating too much and not eating enough, is linked to many health issues including underweight malnutrition, obesity, type 2 diabetes, cancer, falls and dementia. It leaves a significant number of people food insecure (8% in Scotland) and a larger number overweight or obese (65% of adults and 33% of children in Scotland).² At least 1 in 10 older people are at risk of or suffering from underweight malnutrition

¹ SFC: The Scottish Food Coalition is an alliance of over 40 organisations including: small-scale farmers and growers, academics, workers' unions and charities focused on the environment, health, poverty and animal welfare. We know that the challenges facing our food system are connected and we need to work across the whole system to achieve a healthy, fair and sustainable future. See full membership here: <https://www.foodcoalition.scot/who-we-are.html>

² Obesity indicators 2018, Scottish Government <https://www.gov.scot/publications/obesity-indicators/pages/2/>

in the UK.³ The food system generates many low-paid, insecure jobs: in Scotland, and globally, food workers are one of the groups most likely to run out of food. The food system is responsible for around 30% of greenhouse gas emissions and over 60% of biodiversity loss⁴: it is eating its own future. Delivering on the Sustainable Development Goals depends fundamentally on transforming the food system.

This Bill has the potential to provide the necessary, firm foundations and strong legislative framework for Scotland to take a global lead in food systems reform and transformation, shaping existing and future food-related legislation, regulation and policy to ensure all are pulling in the same direction. This is important to the Scottish economy, livelihoods and sustainability of households, communities and businesses throughout Scotland.

Instead, the Bill as introduced fails to achieve this. It has no clear goals, principles or direction, and no mechanisms for participation or accountability. It does not strengthen human rights nor does it acknowledge the food system's role in contributing towards the nature and climate crises.

The Bill has been described by the Scottish Government as 'giving practical effect to the right to food'. This primary purpose should therefore be explicitly set out in the Bill, for example by defining the right to food, restating the duty on Scottish Ministers to realise this right; and by linking the duties and powers set out in the Bill to giving practical effect to the right to food.

The Bill should set out a small number of high-level targets aligned to the UN Sustainable Development Goals and the National Performance Framework, in a similar way to the Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019 and the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019.

For example, a target under SDG12 (sustainable production and consumption) would be to measure the environmental impact of the food system, including Scotland's global footprint, and set a target for its reduction, in line with the Scottish Government's target of Net Zero by 2045. This would bring policy in line with the policies of the UK's multiple retailers such as Tesco and Co-op. A target under SDG2 would be to end severe household food insecurity by 2030. A target under SDG 3.4 would be to reduce the burden of diet-related disease by one third by 2030 or to align Scotland's diet with the Government's own dietary goals.

The Good Food Nation Bill must lay the foundation for future legislation – for example on food waste in the Circular Economy Bill or the food environment in a Public Health Bill, on the need for nature-friendly farming in the Environment Bill or agricultural subsidy reform in the Agriculture Bill. These pieces of legislation would include more detailed measures to deliver on these targets.

³ Eat Well Age Well, 'More than Meals: Community Food Initiatives to Support Older People to Eat Well'

⁴ WWF: It's time to reconsider our food system <https://www.wwf.org.uk/what-we-do/food>

Crucially, the Bill - and the national food plan it mandates - must take account of the extraterritorial impact of Scotland's food system. Our imported feed and food has a significant global footprint, impacting nature, climate, water, soil and livelihoods across the world. A recent study suggested that 70% of the cropland and 64% of the greenhouse gas emissions of the UK diet are located abroad.⁵

The Scottish Government's 2021 vision for trade document states: "Scotland wants to trade based on our principles of inclusive growth, wellbeing, sustainability, a just transition to net zero and good governance."⁶ How we trade in food must also reflect these principles.

The Bill should also establish an independent Scottish Food Commission which would have a role and remit similar to the Scottish Land Commission in monitoring and reporting on progress towards SDGs; scrutiny of National and Local Food Plans, facilitation of partnership working, commissioning and/or undertaking food systems related research, data gathering and innovation, provision of advice and guidance, ensuring legislative compatibility and policy coherence, and supporting citizen engagement.

In December 2018 the Scottish Government launched a consultation on Good Food Nation proposals for legislation, this consultation recognised that businesses have a role to play in achieving the Good Food Nation ambition. Analysis of the consultation results showed that almost all of respondents "strongly agreed or agreed that the Government should encourage and enable businesses to play their part in achieving the Good Food Nation ambition. A key theme was that all businesses which are part of the food industry must be involved in achieving the Good Food Nation ambition. For many of these respondents, this included private sector food businesses."⁷

Despite this the Bill as introduced makes no reference to the role of businesses. We believe that the Scottish Government should enable, encourage and ensure that businesses play their part in creating a Good Food Nation. By businesses, we mean the whole spectrum of private enterprises involved in the food system, from farms, crofts, and fisheries, to processors, abattoirs, logistics, retailers, social enterprises, hospitality, catering and waste management. The Good Food Nation Bill and should drive changes to incentives, regulation and other government-controlled mechanisms to allow businesses to play their part in achieving the Good Food Nation vision. Businesses are continually showing that they are willing to play an active role, and the Government should enable those who are leading the way. Any incentives paid to businesses involved in the production, processing, sale or waste of food should not be directly or indirectly subsidising movement away from the Good Food Nation objectives. Government business and trade policy must be aligned with the Good Food Nation goals.

⁵Global cropland and greenhouse gas impacts of UK food supply are increasingly located overseas: Henri de Ruiter, Jennie I. Macdiarmid, Robin B. Matthews, Thomas Kastner, and Pete Smith: <http://dx.doi.org/10.1098/rsif.2015.1001>

⁶ Scottish Government, Trade: Our Vision <https://www.gov.scot/publications/scottish-government-vision-trade/pages/3/>

⁷ Scottish Government, Good Food Nation proposals for legislation: analysis of consultation responses <https://www.gov.scot/publications/good-food-nation-proposals-legislation-consultation-analysis-report/>

In its current form, the Bill is not fit for purpose and we ask the Committee to call for a broader and stronger framework Bill as set out above.

2. 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.

There is strong public and cross-party support for establishing the right to food in Scots law. Forty-five years ago Scotland, through the UK, ratified the International Covenant on Economic Social and Cultural Rights, which includes the right to food.

This Bill could be amended to bring this element of the Covenant directly into Scots law. The Scottish Food Coalition – along with the Scottish Human Rights Commission – believes that this is both practicable and desirable, and will underpin efforts to give practical effect to the right to food.

We understand that a comprehensive human rights provision (via a new Human Rights Bill) is planned later in this parliament. However, as the First Minister’s Taskforce on Human Rights set out in their 2021 Leadership Report: ‘Furthermore, the Taskforce recognises that none of the recommendations stated here should hinder the advancement of the protection of rights through other legislation or processes, whether before or after the new human rights statutory framework is introduced.’⁸

This legislation offers a clear opportunity to advance the protection of rights. In its 2018 report on ‘Getting Rights Right’, the previous Parliament’s Equalities and Human Rights Committee stated: *‘Our recommendations present an opportunity to be bolder and to strengthen our existing procedures and processes, to make human rights more central to our work and how we undertake our scrutiny function and to be an exemplar of international best practice to other parliaments. Taking a human rights-based approach to scrutiny will ensure the Parliament is aware of any decline of human rights protections and is able to identify opportunities to advance human rights to help build a fairer, more just society.’*⁹

The Bill is weak in its linkages to human rights law, proposing in 3(2) only that Ministers should ‘have regard’ to certain articles and clauses of certain international instruments, in a limited way, and providing for Ministerial discretion to further limit this requirement. This is regressive compared to previous legislation such as the Children and Young People Act 2014, which requires Ministers to implement measures in regard to the whole Convention.

We therefore recommend that the Equalities, Human Rights and Civil Justice Committee is asked to examine this aspect of the Bill and to make recommendations on the desirability and

⁸National Taskforce for Human Rights: leadership report: <https://www.gov.scot/publications/national-taskforce-human-rights-leadership-report/documents/>

⁹Getting Rights Right: Human Rights and The Scottish Parliament <https://digitalpublications.parliament.scot/Committees/Report/EHRIC/2018/11/26/Getting-Rights-Right--Human-Rights-and-the-Scottish-Parliament-3>

practicability of incorporating the right to food into Scots law as part of this Bill, or otherwise advancing human rights protection with regard to food in Scotland.

Even without formally incorporating the right to food, this Bill can help to progress the right to food and establish it as a guiding principle of food policy in Scotland. This can be achieved by:

- Clear strong language (as in the Social Security Scotland Act) defining the right to food, setting out that the right to food is a human right and enables the fulfilment of other human rights, such as the right to health, the right to a healthy environment, and the right to an adequate standard of living and housing. This definition must cover the full scope of the right to food (health, acceptability and environmental sustainability as well as access) and place a duty on national and local Government and other public bodies progressively to ensure people have access, in a dignified and culturally appropriate manner, to nutritious, sustainable and safe food at all times.
- Clear duties on Ministers (as in the Children and Young People Act 2014) to 'keep under consideration whether there are any steps which they could take which would or might secure better or further effect in Scotland of the...(UNCRC) and to report to Parliament on steps taken'
- A clear link between the national and local food plans proposed in the Bill and the right to food, including access to land for food growing
- Human rights-based indicators to judge progress towards realising the right to food
- An independent food commission which would report among other things on realisation of the right to food

More generally, the Bill does not conform to good practice in human rights, as it makes no provision for participation, accountability and non-discrimination.

3. 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](#)?

This is - or should be - a Framework Law. This means the Good Food Nation Bill must establish high-level principles, a direction of travel and clear goals for the food system over the next couple of decades, and a process for delivering and reporting on progress. Recognising the interconnectedness of the food system, and its key role in delivering on the Sustainable Development Goals, the Bill must be designed to enable Policy Coherence for Sustainable Development (PCSD).

These principles and goals should inform and underpin the proposed national and local food plans and all future food-related legislation, regulation and policy– including, for example, the forthcoming Agriculture Bill, future public health measures on food, the Circular Economy Bill, the Environment Bill, the National Planning Framework 4 and the National Care Service.

The principles of the Bill should inform the way we organise our NHS, train our chefs, social care staff, doctors, dentists and teachers; how we plan our towns and cities, run our festivals and spend public money on farming, fishing and public food.

It should set out to achieve the standard of nutrition proposed by John Boyd-Orr 85 years ago: “the standard is not just to provide a diet which will keep people alive, but a diet which will keep people in health; and the standard of health adopted is a state of well-being such that no improvement could be affected by a change in the diet.”¹⁰

The Wellbeing of Future Generations (Wales) Act 2015 is a good example of an Act that links across multiple policy initiatives - all subsequent legislation must consider how it aligns with the Wellbeing of Future Generations Act, and public bodies, including government departments are accountable to goals in the bill. Additionally, public bodies are required to carry out impact assessments and account for preventative spending to ensure that future generations are not affected by avoidable issues.

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

We have set out some possible targets, outcomes and indicators below. We think it is essential to set out a small number of headline targets on the face of the Bill. However, one of the key roles of an independent food commission is to work with both national and local government to develop and refine a core set of robust and practicable food system indicators.

Food is a cross-cutting issue, and the food system is relevant to all 11 of the Government’s national outcomes and associated national performance indicators: Similarly, the food system delivers outcomes across most of the UN Sustainable Development Goals, as highlighted by the recent UN Food Systems Summit, held during the UN General Assembly this year.

The original Good Food Nation formulation sets out some key outcomes:

By 2025, Scotland will be ‘a Good Food Nation, where people from every walk of life take pride and pleasure in, and benefit from, the food they produce, buy, cook, serve, and eat each day.’

In 2020, Scottish Ministers remain committed to the concept and reality of achieving our vision of Scotland as a Good Food Nation where:

- *it is the norm for Scots to take a keen interest in their food, knowing what constitutes good food, valuing it and seeking it out whenever they can*
- *people who serve and sell food – from schools to hospitals, retailers, cafes and restaurants – are committed to serving and selling good food*
- *everyone in Scotland has ready access to the healthy, nutritious food they need*

¹⁰ Nourish Scotland Magazine, 2017: What Would Boyd Orr do? <https://www.nourishscotland.org/wp-content/uploads/2017/01/Nourish-Magazine-Issue-6-Boyd-Orr.pdf>

- *dietary-related diseases are in decline, as is the environmental impact of our food consumption*
- *Scottish producers ensure that what they produce is increasingly healthy and environmentally sound¹¹*

This vision is clearly not the reality in Scotland. Around 8% of households experience food insecurity due to financial barriers, while a much larger percentage are unable to afford a varied healthy diet of their choice.¹² The charity sector has been forced to fill the gap, providing emergency food parcels to meet increased need and these frontline food security teams are often insecurely funded. Dietary-related diseases are not in decline. Intensive animal agriculture causes animal suffering, pollution, high emissions, and antimicrobial resistance, as well as contributing to the risk of zoonotic diseases. Further, the intensification and specialisation of global agriculture has led to widespread biodiversity declines, including farmland birds. The environmental impact of the food we produce and the food we import is therefore incompatible with achieving a net zero and nature positive Scotland.

Our food system is characterised by inequity – inequity in respect of nutritional and healthy life outcomes at all ages, inequity in respect of having the resources to choose a healthy and sustainable diet, inequity in terms of access to land, inequity in terms of job security and respect. Reducing these inequities must be a core purpose of the Bill.

One core outcome therefore for the plans at both national and local level is that everyone can access and enjoy good food – which we would define as varied, health-giving, culturally valued, fairly produced and sustainable.

Targets:

A small number of ambitious and achievable targets should be set out on the face of the Bill. These signal a clear direction of travel and call for resources and policies to be aligned to achieve them - just like the 2045 net zero target. For example:

- Ending severe household food insecurity by 2030
- Halving childhood obesity by 2030 - This is a key measure of childhood and future health. Is related to inequalities and rights to food issues as we know childhood obesity is clearly patterned on deprivation with a significant and growing inequality gap.
- At least halving the environmental impact of the food system, including halving food waste by 2030 - This target is key in making Scotland a net zero and nature positive nation. This could include measures setting targets to reduce the use of nitrogen fertilisers, pesticides, and antibiotics in agriculture along with appropriate support to reach those goals.

¹¹ Scottish Government, Good Food Nation policy:

<https://www.gov.scot/policies/food-and-drink/good-food-nation/>

¹² House of Commons Library, Food poverty: Households, food banks and free school meals

<https://commonslibrary.parliament.uk/research-briefings/cbp-9209/>

- Achieve the Scottish Dietary Goals by 2035 - Scottish Dietary Goals are already monitored through various established mechanisms by Food Standards Scotland, this target would also allow the food system and national and local food plans to understand and be accountable for dietary shifts needed for health. It will also ensure that suppliers have developed their offering so that local increasingly equals fresh, healthy and environmentally sound
- Payment of the living wage in the food and drink sector; an extension of trade union representation, collective bargaining and trade union negotiated pay rates across the food sector and supply chain; the integration of these principles in procurement processes and contracts.
- End caging farmed animals by 2027, in line with the EU's commitment.¹³ This move away from the most intensive farming practices would have wider environmental and health benefits and be in line with the idea of 'good food'.

Indicators:

Some of the existing national performance indicators (waste generated (including food waste), access to green and blue space, sustainability of fish stocks, greenhouse gas emissions; food insecurity; healthy life expectancy; healthy weight (adults and children); employees on the living wage; relative and persistent poverty) are directly relevant to national and local food plans, and already reported at national and local level.

The previous Scottish Food Commission proposed indicators across four key objectives: Health, Social Justice, Sustainability and Prosperity.¹⁴

Health

- *Headline indicator: Proportion of the population considered a healthy weight*
- *Second-tier indicators: Incidence of type II diabetes; Percentage of Primary 1 children with no obvious tooth decay experience; Proportion of young people having a shared meal more than four times a week; Scottish Dietary Goals*

Social Justice

- *Headline indicator: Proportion of jobs paid the living wage in the food and drink sector*
- *Second-tier indicator: Number of emergency food aid provisions*

Sustainability

- *Headline indicator: Net GHGs from agricultural and related land use*

¹³ European Commission's response to the European Citizens' Initiative on "End the Cage Age"
https://ec.europa.eu/commission/presscorner/detail/en/QANDA_21_3298

¹⁴Indicators for a Good Food Nation, A project for the Scottish Food Commission:
<https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2016/06/indicators-good-food-nation/documents/food-commission-report-indicators-good-food-nation-pdf/food-commission-report-indicators-good-food-nation-pdf/govscot%3Adocument/Food%2BCommission%2BReport%2B-%2BIndicators%2Bfor%2Ba%2BGood%2BFood%2BNation.pdf>

- *Second-tier indicators: Natural Capital index (cropland and grassland), high nature value farming and forestry*

Prosperity

- *Headline indicator: Level of skills in food and drink sector*
- *Second-tier indicator: Exports of food and drink products*

This approach could be further refined and developed. In particular, indicators could be more closely aligned with human rights, not least the right to food and the right to a healthy environment.

For example 'Affordability of a healthy sustainable diet' provides an objective measure linked directly to fulfilling the right to food. Similar to the fuel poverty indicator, this would link the cost of good food to disposable income for different household income bands. Other indicators could be: Amount of public food procured locally from higher animal welfare systems and the amount of land made available for community growing (allotments, gardens, orchards, market enterprises), and agroecological new entrants. Sustainability targets could include Nitrogen Use Efficiency, using the newly published Nitrogen Balance sheet, feature condition of designated sites, species trends, water quality, soil health.

5. 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.

The national food plan by definition must read across many departments as set out above - and have implications for how those departments allocate their resources.

As such, the Scottish Food Coalition ask that the Health and Sport Committee, the Equalities, Human Rights and Civil Justice Committee and the Local Government and Communities Committee input into the development of the Good Food Nation Bill, as it is entirely relevant to their remits. This relates back to the need set out above for legislative compatibility and policy coherence.

It is a Government plan and, as such, Ministers would be expected to implement those aspects of it which are within their portfolio and to co-operate with colleagues on delivering the plan as a whole.

This is the case, for example, with the Climate Change Plan, and the national food plan should have a similar status.

The Climate Change (Emissions Reductions Targets) (Scotland) Act 2019 sets out in considerable detail the required contents of the climate change plan.

This Bill should provide at the minimum a schedule of the areas which the National Food Plan should cover, linked to a specific set of outcomes and indicators. It currently only requires Ministers to have regard to (a) social and economic wellbeing, (b) the environment, (c) health, and (d) economic development.

This is too generic, and risks important areas such as agriculture and fisheries, extraterritorial impact, planning, animal welfare, land reform and human rights not being adequately addressed.

Additionally, we believe that it is important that the Good Food Nation Team is well-resourced and embedded throughout the Scottish Government. While we very much appreciate the work of the current Bill team, we feel strongly that this issue is such that it should not be dealt with by one team working in isolation from other overlapping portfolios (including health, environment, agriculture, fisheries, business and trade).

We ask that the team is strengthened specifically with support spanning across portfolios and bringing together expertise from different parts of government, for example via the Inter-Ministerial Group for Environment, Food and Rural Affairs, and a shadow civil servants support team, should be formalised and required to meet on a quarterly basis to maximise coherence and compatibility.

An independent food commission should work with both national and local government to identify secondary legislation that will build upon the framework legislation and deliver on the objectives of the Bill.

6. 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.

It is essential that the Bill establishes an independent statutory food commission. Responsibility for food issues in Scotland (and the UK) is spread across many different portfolios, departments and public bodies, in both local and national government. Ministerial Portfolios and Scottish Government Departments focus on their own agenda and budgets often creating tensions, conflicts and missed opportunities in policy development, coherence and implementation.

Whilst the government will always have good intentions to work across departmental boundaries, the pressure of day to day work tends to take priority – for example the Inter-Ministerial Group for Environment, Food and Rural Affairs has met only very occasionally since it was established.

The commission will provide expert advice and scrutiny to the Government, and help ensure Scotland's journey to becoming a Good Food Nation is fair for everyone. Advice and scrutiny will be critical to a just transition for the food system as Scotland's economy shifts and changes in response to the climate, nature and health crises.

- I. A statutory food commission reads across all food-related issues, from the rights of migrant fisheries workers to community food-growing, from the obesogenic food environment to agroecology, from ending the need for food banks to the wider impacts of pesticides.
- II. At its core it asks: 'how well are we delivering on the right to food, across the three pillars of access, health and sustainability? How could we work together to do better?'
- III. Crucially – as with the UK Committee on Climate Change – it can take a 'systems' approach, recognising the need for joined-up policy across departments and between local and national government. It will help national and local government to make more effective and efficient use of public and private resources to deliver better social, economic, environmental and health outcomes.
- IV. The Scottish Food Commission should be a standalone body, reporting and being accountable to Parliament. It should include a number of commissioners with a range of experience and skills who represent a breadth of interests and lived experiences. The process for appointing commissioners should be transparent.
- V. The commissioners would be supported by a small staff team, much like the Scottish Land Commission.
- VI. In terms of its activities, the Commission would, for example:
 - a. Undertake research and make recommendations based on evidence and current progress towards targets.
 - b. Produce an annual report on the state of Scotland's food system and progress made on realising the right to food, drawing on national and local data and indicators.
 - c. Facilitate and support partnership working to drive food systems change
 - d. Advise on opportunities to enhance legislative compatibility and policy coherence,
 - e. Support a dynamic process of citizen engagement and public consultation at both national and local level;
- VII. The Good Food Nation Bill should place a duty on Ministers to respond to the Scottish Food Commission's recommendations.

- VIII. A statutory Scottish Food Commission should have a clear and transparent process for engaging with civil society networks.

The Scottish Land Commission is a useful model for a commission which has taken an active role in pushing forward a progressive agenda, commissioning research, engaging with stakeholders, hosting public meetings and roadshows. This is an excellent example of positive action from the Scottish Government to create an independent, cross-cutting, participatory governance body.

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

Many local authorities have already developed joined-up food plans, with Glasgow a notable recent example. This Bill – by requiring local authorities to produce food plans – gives those plans a more secure footing in local government policy-making.

In some cases, health boards have been actively involved in co-developing those food plans. At the same time, health boards have generally been less proactive in developing and implementing food policies.

Health boards must be centrally involved given the massive impact of nutrition on health. For example, being overweight now accounts for more deaths in England and Scotland than smoking among people in middle- and old-age.¹⁵

Additionally, food is a key element in social care and must be embedded in the plans for a National Care Service.

There is an opportunity for local and national governments to work closely together so that local and national plans inform, complement and reinforce each other. Local government and health boards will deliver many of the practical actions to deliver a good food nation – tackling food insecurity, improving public food, shaping the food environment, supporting the local food economy, reducing emissions and biodiversity loss, influencing regional land use and reducing food waste.

SFC would want to see public kitchens serve food which sets an example for others to follow, supporting local food economies and reflecting dietary guidelines (especially for at risk population groups e.g. infant and older people): with little processed food, less but better meat and dairy (in line with the recent Climate Change Committee report), local and seasonal fruit, vegetables and whole grains.

¹⁵ BMC Public Health, Changes over 15 years in the contribution of adiposity and smoking to deaths in England and Scotland: <https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-021-10167-3>

Local authorities and health boards will need resources to develop and deliver good food policies. The Financial Memorandum for the Good Food Nation Bill has no additional budget allocated to health boards to support the development and delivery of their national food plans, stating that “The Bill will not require significant additional activity by the health boards and any new costs are negligible.”¹⁶ It is not effective to put the duty on health boards to produce plans with no resource to do so - no change will be forthcoming without the resource.

Implementation has failed to deliver on statutory duties, for example, as those laid out in the Procurement Reform Act (statutory duty with respect to sustainable procurement). In developing and implementing their food plans, local authorities and health boards should have duties similar to the Scottish Government to deliver on the right to food. They should also use a common set of indicators and must be allocated the necessary resources to discharge these duties effectively and efficiently.

The Integrated Joint Boards, which will become Community Health and Social Care Boards, should also be required to produce food plans as they oversee the delivery of all community health and social care services and support within their local area, monitoring and improving impact, performance and outcomes for people. The provision of food is integral to care, hospital discharge food security, whether this is early years provision, at-home care, crisis care, or care homes for older people.

8. 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.

No. It simply provides for the national and local government to consult on a draft plan with the persons Scottish Ministers / Local authorities consider appropriate. The Bill must provide for active participation by stakeholders – including children and young people – in developing food plans at national and local level.

At local level, this can be done through food policy partnerships providing an active engagement and participation throughout the development of its city food plan. At the national level, we recommend that a citizen food assembly should be established. It would be appropriate for this to be organised by the Food Commission, with a citizens’ food assembly arranged to inform each iteration of the food plans, using a similar approach to other recent citizen assemblies in Scotland, such as the one established in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. This is aligned with the recently published Scottish Government report¹⁷ calling for the Citizens’ Assembly of Scotland model to be embedded in Scottish politics, enshrining the principles and practice of participatory democracy and giving the Scottish public a direct role in future decision-making and improving accountability.

¹⁶ Good Food Nation (Scotland) Bill - Financial Memorandum <https://www.parliament.scot/-/media/files/legislation/bills/s6-bills/good-food-nation-scotland-bill/introduced/financial-memorandum.pdf>

¹⁷ Doing Politics Differently: The Report of the Citizens’ Assembly of Scotland. <https://www.citizensassembly.scot/report-assembly/chapter-five-recommendations-assembly/preparing-final-recommendations>

There should be an explicit duty on relevant authorities that how they seek input and views on Good Food plans should be both intersectional and fully accessible. Relevant authorities should use accessible and inclusive communication to work with people with lived experience in the design of Good Food plans and implementation, including formats such as Community Languages, BSL, Braille, Moon, Easy Read, clear and large print, and paper formats

Additionally, the Government should be required to engage with communities whose right to food and health outcomes, in particular, are most likely to be at risk. These include, for example: refugees and asylum-seekers; people suffering from chronic illnesses; people working in the food system with low-paid or insecure jobs; people living in residential care or prison; disabled people, especially those who rely on social care providers for access to food.