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Consultation Response

Good Food Nation Proposals for Legislation A WWF-Scotland Response

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SUMMARY

WWF Scotland welcomes these proposals for Good Food Nation legislation and the opportunity to respond. Scottish Government has ambitious plans to double the value of the Food and Drink sector by 2030. This value, the provenance and reputation of our products and the sustainability of the industry are dependent on protecting and enhancing Scotland's natural resources and environmental quality. However, globally, food production and consumption are key drivers of environmental damage, including habitat loss, wildlife declines and greenhouse gas (GHG) emissions. It is clear that we must do things differently in Scotland if we are to meet our food and drink ambitions. A Good Food Nation Bill could help us do that.

Over three quarters of the land area is used for agricultural food production in Scotland. Whilst intensive farming can negatively impact the environment, extensive farming systems, managed in a way that is sympathetic to nature, can have biodiversity benefits and should be supported. A quarter of GHG emissions are released from Scottish agriculture but agriculture and other land uses also hold the solution to greenhouse gas removal through sustainable land management. In addition, current patterns of food consumption are unsustainable - a third of food produced is wasted, also wasting the natural resources used to produce it and releasing more GHGs.

We believe that a framework Good Food Nation Bill would help Scotland tackle the multiple environmental, social and economic challenges of the Scottish food system and harness the opportunities. We are encouraged by proposals for duties on Ministers and local authorities to produce cross-cutting statements of policy on food including indicators of success, the duty to consult and review and to collaborate to ensure a joined up approach. However, we feel that Scottish Government needs to go beyond the current proposals in order to meet the scale of the challenge and to deliver on both previous Good Food Nation ambitions and on international commitments. We believe that a Good Food Nation Bill is essential in order to:

- Embed the right to food in Scots law
- Establish a duty on Ministers to create a national food plan, which informs food plans prepared by other public authorities

- Set clear objectives addressing key issues with the current food system to ensure that the true value of our food and drink sector is achieved, looking beyond GVA and playing to Scotland's strengths to include the potential for social and environmental gains.
- These objectives should include target to **Halve the environmental impact of the food system, including halving food waste by 2030**
- Set out mechanisms for cross-portfolio working towards these objectives, recognising the wide-ranging impacts and opportunities to be addressed in achieving Scotland's Good Food Nation ambitions
- Establish effective governance arrangements through an independent Food Commission and a protocol for reporting on progress towards objectives.

RESPONSE TO QUESTIONS

Q1 - 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?

WWF Scotland agrees with the proposal of a duty on Ministers and public authorities to produce statements of policy. We would envisage this taking the form of a National Food Plan, prepared by Ministers, reflecting the wide range of issues and opportunities from the current food system. These issues must include, but not be limited to addressing the environmental impacts of food production and consumption, discussed below. Whilst recognising that each of these environmental issues are linked to a range of targeted policies, strategies and legislation, a Good Food Nation Bill must effectively link these to respective policy frameworks driving food production and consumption in order to minimise their impacts on the environment. **We believe that one core target of a Good Food Nation Bill must be to halve the environmental impact of the food system in Scotland, including halving food waste, by 2030.**

Environmental impacts of the current food system

Biodiversity

Globally, food production and consumption are key drivers of habitat loss and wildlife declines. A recent paper found that 75% of all plant, amphibian, reptile, bird and mammal species that have gone extinct since AD 1500 were impacted by overexploitation or agriculture or both¹. Over-exploitation and agriculture have been driven by human consumption habits and over the past 50 years our Ecological Footprint, a measure of consumption of natural resources, has increased by 190%². In Scotland, agricultural food production influences three quarters of the land area and has a significant influence on the environment, in some cases positive and in others negative. Production and harvesting food and associated land uses can have direct negative impacts on biodiversity, for example through removal of native woodland or hedgerows, or disruption of habitats and biodiversity-mediated functions, for example through drainage or poor soil management. Negative impacts can also be indirect, by impacting broader ecosystems which affect habitat function and species richness³.

¹ Maxwell, S.L., Fuller, R.A., Brooks, T.M. & Watson, J.E.M. (2016). Biodiversity: The ravages of guns, nets and bulldozers. *Nature* **536**: 143-145

² Global Footprint Network (2018). National Footprint Accounts 2018 edition. <https://data.footprintnetwork.org/#/>

³ WWF (2018). Living Planet Report. https://wwf.panda.org/knowledge_hub/all_publications/living_planet_report_2018/

Historical land use change for agriculture contributed to the loss of the majority of Scotland's native woodland, which now covers just 4% of the land area⁴ and agriculture and related operations contribute to five of the top ten pressures facing features of designated sites in Scotland, including overgrazing, undergrazing, water management, agricultural operations and trampling⁵. Due to collective pressures of habitat loss, invasive species, climate change and overexploitation, one in eleven species known to occur in Scotland are now at risk of extinction⁶. On more intensively managed agricultural land, primarily arable or improved grasslands, species numbers and habitat diversity have shown serious declines. Farmland biodiversity is impacted by changes in management practices, including fertiliser application and changes in sowing and harvesting practices, loss of crop diversity and frequency of agricultural operations⁷.

The Convention on Biodiversity set 20 global 'Aichi' targets, which Scotland has committed to achieving. However, progress towards these targets has been slow and Scotland is currently on track to meet only 7 of the targets by 2020. A number of the targets relate directly or indirectly to food production and consumption but Scotland is behind on delivery of all of these, with the exception of Target 15, and thus the targets will not be met by 2020⁸. These include:

- Target 3 – Incentive reformed
- Target 4 – Sustainable consumption and production
- Target 5 – Habitat loss halved or reduced
- Target 7 – Sustainable agriculture, aquaculture and forestry
- Target 8 – Pollution reduced
- Target 10 – Pressures on vulnerable ecosystems reduced
- Target 12 – Extinction prevented
- Target 13 – Genetic diversity maintained
- Target 14 – Ecosystem services safeguarded
- Target 15 – Ecosystems restored and resilience enhanced

It is clear that the way we manage land for food production can have significant, negative impacts on biodiversity, but it isn't always that way. Extensive farming systems, managed in a way that is sympathetic to nature, can have biodiversity benefits. In contrast to UK trends, Scottish farmland birds have shown a long-term increase in most of the 27 species contributing to the indicator. This includes corncrake, a priority species which previously suffered significant declines due to changes in agricultural practices but which responded well to more targeted management⁹. Around 40% of Scotland is classified as High Nature Value (HNV) farmland¹⁰, compared to 9% in England¹¹. HNV farmland is associated with traditional farming and crofting practices, generally extensive livestock grazing, which has

⁴ Forestry Commission (2014). Scotland's Native Woodlands. Results from the Native Woodland Survey of Scotland. [https://www.forestry.gov.uk/PDF/FCMS126.pdf/\\$FILE/FCMS126.pdf](https://www.forestry.gov.uk/PDF/FCMS126.pdf/$FILE/FCMS126.pdf)

⁵ RSPB Scotland (2016). Pressures affecting conservation status of designated sites in Scotland: impacts, policy context and recommendations. <https://www.rspb.org.uk/globalassets/downloads/documents/positions/safeguarding-sites/pressures-affecting-conservation-status-of-designated-natural-features-in-scotland.pdf>

⁶ RSPB Scotland (2016). State of Nature: Scotland. https://www2.rspb.org.uk/images/StateOfNature2016_Scotland_1%20Sept%20pages_tcm9-424988.pdf

⁷ James Hutton Institute (2017). CAP Greening Review – Summary <https://www2.gov.scot/Resource/0052/00523863.pdf>

⁸ SNH (2018). Scotland's Biodiversity Progress to 2020 Aichi Targets. <https://www.cbd.int/doc/world/gb/gb-nr-oth-p2-en.pdf>

⁹ SNH (2018). Index of Abundance for Scottish Terrestrial Breeding Birds, 1994-2017. <https://www.nature.scot/sites/default/files/2018-11/Official%20Statistics%20-%20Terrestrial%20Breeding%20Birds%202018.pdf>

¹⁰ Scottish Government (2011). Developing High Nature Value Farming and Forestry Indicators for the Scotland Rural Development Programme. <https://www2.gov.scot/Resource/Doc/355629/0120133.pdf>

¹¹ Natural England (2017). Developing a measure of High Nature Value Farmland (HNVF) for the Rural Development Programme for England NERR068. <http://publications.naturalengland.org.uk/publication/6306196997275648>

resulted in biodiversity rich habitats like the machair grasslands of the Western Isles. It contributes to the incredible landscapes that draw tourism to Scotland and provides a home for species like corncrakes and great yellow bumblebees. HNV farming and crofting is low input and low output, using traditional breeds and working with the land to keep artificial pesticide and fertiliser use low. However, despite the huge benefits of these traditional farming systems, HNV receives a relatively small share of the current rural support budget. This needs to change if we are to move towards a Good Food Nation, which protects the landscapes, wildlife and rural communities which depend on each other.

Climate

Agriculture and related land uses contributed over a quarter of greenhouse gas emissions in 2016, including carbon dioxide, methane and nitrous oxide. The most recent report by the Intergovernmental Panel on Climate Change warns that ‘transitions in global and regional land use are found in all pathways limiting global warming to 1.5°C with no or limited overshoot’¹². Agriculture and related land uses account for 68% of methane and 79% nitrous oxide emissions in Scotland so agriculture has a critical role to play in keeping the planet within sustainable limits. Despite this, Scottish Government has failed to set targets for transformational change for agriculture, in contrast to their approach to other sectors such as transport and waste. As a result, emissions from agriculture and related land use have not changed significantly over the last 10 years and have fallen by an average of only 0.3% per year for the last 5 years. The CCC highlighted that reliance on voluntary measures and overall ambition from the agriculture sector remains a concern and that agriculture will need to make a greater contribution to meeting emissions targets¹³.

The majority, 51%, of agricultural land in Scotland is poor quality rough grazing, with the remainder either mixed agriculture or improved grassland which, in agricultural terms, is only suitable for ruminant livestock production. As a result, agriculture in Scotland is disproportionately dependent on livestock compared to the rest of the UK. However, these constraints also mean there are huge opportunities in terms of climate mitigation and adaptation. The land classified as rough grazing holds significant potential in terms of storing carbon and supporting rare species and habitats. Pasture and farm woodland can also capture and store carbon. This potential must be harnessed and farmers supported through a transition to climate-neutral farming.

A recent report by Vivid Economics, commissioned by WWF Scotland, concluded that net zero GHG emissions could be reached in Scotland well before 2050 but the agriculture sector would need to reduce emissions by 35%. The land use sector as whole would have a critical role to play in scaling up GHG removal to more than offset Scotland’s remaining emissions. It would be possible to do this and maintain current agricultural productivity if farmers employ virtually all available mitigation measures alongside GHG removal¹⁴.

Despite the high number of people who can’t afford food, we waste 1.35M tonnes of it in Scotland, 600,000 tonnes of which is household food waste. These figures exclude food losses incurred in primary production¹⁵. Food waste is the highest impact waste in Scotland in terms of carbon impacts, accounting for 2% of all waste and 17% of all impacts in 2015.

¹² http://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf p. 23. See also Chapter 3 of the full report: http://report.ipcc.ch/sr15/pdf/sr15_chapter3.pdf

¹³ Committee on Climate Change (2018). Reducing emissions in Scotland: 2018 Progress report to Parliament. <https://www.theccc.org.uk/wp-content/uploads/2018/09/Reducing-emissions-in-Scotland-2018-Progress-Report-to-Parliament.pdf>

¹⁴ Vivid Economics (2018). A Climate of Possibility: Harnessing Scotland’s natural resources to end our contribution to climate change. https://www.wwf.org.uk/sites/default/files/2019-01/WWF_Report_VIVID_Jan_2019.pdf

¹⁵ Zero Waste Scotland (2016). How much food waste is there in Scotland? <https://www.zerowastescotland.org.uk/sites/default/files/How%20much%20food%20waste%20is%20there%20in%20Scotland%20Final%20v2.pdf>

Pollution

Agricultural runoff is a significant source of both diffuse and point source pollution. It is estimated that 75% of sediments polluting UK water bodies are derived from agriculture, including 60% of nitrates and 25% of phosphates. As waste management practices have reduced the amount of effluent coming from industrial and human waste sources, agriculture has become the source of a much higher proportion of pollution¹⁶.

Agricultural point source pollution arises from a single source, for example a slurry store. Diffuse pollution can arise from a range of agricultural sources, often individually small but culminating in large impacts. Sources of diffuse pollution include fertiliser and pesticide runoff, cultivation too close to a watercourse, soil erosion and poaching and spreading slurry or dung, either too much or too close to water courses¹⁷. Of all water bodies in Scotland, 252 rivers and lochs are impacted by diffuse pollution and 11% of lochs and 23% of rivers and canals are in poor or bad condition. These are primarily associated with more intensively managed farmland¹⁸.

Diffuse pollution can have significant biodiversity impacts on sensitive species such as salmon, freshwater pearl mussel and water voles, cause algal blooms and can have serious livestock and human health implications¹⁹. Lack of soil testing and efficient nutrient management contribute to the surplus running off into water bodies. At the UK level, 45% of nitrogen and 25% of phosphorous fertilisers applied in 2017 were not taken up by plants and thus were surplus. Unpublished Scottish figures suggest that 48% of nitrogen applied is surplus²⁰. Not only does this represent a huge waste of money, but also contributes unnecessary greenhouse gas emissions and compounds diffuse pollution issues.

Soils

Soils play a fundamental role ecosystem function and underpins delivery of ecosystem services, including regulating nutrient cycling and sequestering carbon²¹. In response to rising demands for food production through the 20th Century, large areas of natural and semi-natural habitat were converted into agricultural land²². This has resulted in depletion of soil organic carbon and nutrients²³, upon which food production depends²⁴. In Scotland, key pressures on soils come from climate change and land use practices, including loss of organic matter, sealing, contamination, change in soil biodiversity, erosion and landslides and compaction. Soil biodiversity is fundamental to food production and the nutritional quality of food but it is particularly susceptible to the negative impacts of land use change and agricultural intensification²⁵. Thus, in order to achieve food security, we must look after our soils.

¹⁶ Holden, J. et al., (2015). Agriculture's impacts on water quality. <http://nora.nerc.ac.uk/id/eprint/510550/>

¹⁷ Farm Advisory Service Scotland. What is diffuse pollution? <https://www.farmingandwaterscotland.org/diffuse-pollution/what-is-diffuse-pollution/>

¹⁸ James Hutton Institute (2017). CAP Greening Review – Summary <https://www2.gov.scot/Resource/0052/00523863.pdf>

¹⁹ Farm Advisory Service Scotland. What's the problem? <https://www.farmingandwaterscotland.org/diffuse-pollution/whats-the-problem/>

²⁰ RSPB Scotland (2018). Balancing Act: How farming can support a net-zero emission target in Scotland. <http://www.scotlink.org/wp/files/documents/RSPB-Scotland-Balancing-Act-report.pdf>

²¹ WWF (2018). Living Planet Report. https://wwf.panda.org/knowledge_hub/all_publications/living_planet_report_2018/

²² Robinson, D.A. & Sutherland, W.J. (2002). Post-war changes in arable farming and biodiversity in Great Britain. *Journal of Applied Ecology* **39**: 157–176.

²³ Franzluebbers, A.J. (2002). Soil organic matter stratification ratio as an indicator of soil quality. *Soil and Tillage Research* **66**: 95

²⁴ Lal, R. (2010). Beyond Copenhagen: mitigating climate change and achieving food security through soil carbon sequestration. *Food Security* **2**: 169–177.

²⁵ Tsiafouli, M.A., et al., (2014). Intensive agriculture reduces soil biodiversity across Europe. *Global Change Biology* **21**:973-985.

Genetic diversity

Of the several hundred thousand species of plant species known today, over 50,000 are edible, yet just 120 are cultivated for food. Nine crops supply over 75% of plant-derived energy globally and just three crops, rice, wheat and maize, provide 50%. Intensification of agriculture has resulted in loss of genetic diversity of wild plants and animals but has also led to selection of an increasingly narrow range of species of livestock and crops²⁶. This increases the risk of disease and reduces resilience, threatening biodiversity and food security. In contrast, agricultural diversity, including systems with higher genetic diversity, can have higher productivity across different growing conditions, increase yield and stability of yield, be more resilient to pressures such as climate change, pests and diseases and underpin food security²⁷.

Marine

Policies around food production should not only address agricultural production on land (30% of the planet) but also seafood production which takes place across our oceans (70% of our planet). Here in Scotland that production contributes roughly £944million to the Scottish economy²⁸. Fish and shellfish, if managed and farmed sustainably, can deliver a low climate change impact renewable protein source forming part of a sustainable diet and future food security.

Fish are essential elements of the marine environment that require healthy and well-functioning ecosystems in order to flourish. Yet the impacts of fishing go far beyond pressure on fish stocks themselves, including damage to seabed habitats, bycatch of non-target, non-quota protected species (such as endangered sharks, whales, dolphins and seabirds), and changes to food webs and ecological functioning resulting from over-exploitation. For too long, fisheries management has been carried out in isolation from other marine management, without consideration of its wider ecological impacts and without full appreciation for the role it has in food security. Future legislation (whether developed by the UK or Devolved Administrations) should fit within a framework of wider marine law and policy that will assist in the restoration of nature and the delivery of a sustainably harvested natural resource that can be relied on for future food security.

Global dimension

As the UK imports 50% of its food, Scotland is part of a global food system. The leading foreign supplier of food in 2017 was the EU, providing 30% of imports, then Africa, Asia, North and South America each providing 4%²⁹. In striving to become a Good Food Nation, we must acknowledge the external, international impacts of our food consumption, as much as the local impacts of production. Two key products which many of us consume indirectly, soy and palm oil, are linked to large scale deforestation and habitat destruction, which in turn reduces the capture and storage of carbon and impacts biodiversity.

In the EU, 90% of soy is used for livestock feed³⁰. In 2015, only 1% of global soy production was certified under Round Table on Responsible Soy (RTRS), which provides credible and transparent safeguards against social impacts and deforestation³¹. Soy is a less prominent

²⁶ Food for all – World Food Summit. <http://www.fao.org/3/x0262e/x0262e02.htm>

²⁷ Frison, E.A., Cherfas, J. and Hodgkin, T. (2011) Agricultural Biodiversity Is Essential for a Sustainable Improvement in Food and Nutrition Security. *Sustainability*. 3:238-253. This study is free to view at: www.mdpi.com/2071-1050/3/1/238/pdf

²⁸ Scotland Food and Drink. <https://www.foodanddrink.scot/about-the-industry/>

²⁹ National Statistics (2017). Agriculture in the United Kingdom 2017.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741062/AUK-2017-18sep18.pdf

³⁰ Soy Barometer (2014). A research report for the Dutch Soy Coalition.

http://www.bothends.org/uploaded_files/document/Soy_Barometer2014_ENG.pdf

³¹ Round Table on Responsible Soy (2017). Certified volumes and producers.

<http://www.responsiblesoy.org/mercado/volumenes-y-productores-certificados/?lang=en>

source of animal feed in the UK, accounting for around 8% of animal feed usage in 2017³². However, meat, cheese, eggs and milk from animals fed soy-based feed can be linked to loss of biodiversity in areas like the Cerrado in Brazil, the Chaco Region in Argentina and the Atlantic Forest in Paraguay. Greater commitment to sourcing RTRS-certified soy would reduce the global environmental footprint of the Scottish food system.

Similarly, palm oil is the world's most traded vegetable oil and is present in a wide range of food products, from chocolate to biscuits and cakes. It is imported in high volumes from Malaysia and Indonesia, and also from Papua New Guinea. Clearing rainforests for palm oil plantations has led to habitat loss and threats to endangered species such as orangutans, elephants, rhinos and tigers. The solution is to source palm oil that is grown in a sustainable, deforestation-free way. The Roundtable on Sustainable Palm Oil (RSPO) has made strong progress on reducing the social and deforestation risks associated with palm oil. Governments can play a key role in creating an environment where palm oil linked to illegal or irresponsible production is no longer tolerated, particularly through public procurement.

Cocoa and imported beef are also associated with deforestation and biodiversity loss. Impacts of the former can be ameliorated by favouring well-embedded certification schemes like Utz and Fairtrade. Beef sourced from Brazil, China, Namibia and Argentina have a higher environmental footprint³³ but locally sourced, extensively grazed beef is a more sustainable option.

Some of the powers required to influence these global dimensions, particularly regarding trade, are largely reserved to Westminster. In 2015, the UK Government signed the Amsterdam Declaration Towards Eliminating Deforestation from Agricultural Commodity Chains with European Countries³⁴ and their 25-year plan for the natural environment represents a significant opportunity to provide an operational framework to reduce any negative impacts we have due to international trade³⁵. In ensuring that Scotland truly is a Good Food Nation, at home and abroad, it will be essential that the Scottish Government works with the UK Government to progress this work and inputs into the development of the proposed UK National Food Strategy.

We believe the National Food Plan (statement of food policy) prepared by Ministers should:

- Be published within no more than 12 months of the Good Food Bill coming into force.
- Address issues related to the food system in each of the outcome categories of the National Performance Framework: Children and Young People, Communities, Culture, Economy, Education, Environment, Fair work and Business, Health, Human Rights, International and Poverty.
- Set objectives reflecting headline targets which should appear on the face of the bill. We support the Scottish Food Coalition's proposed headline targets for the Bill:
 - All workers in the food sector paid at least the living wage and included in collective bargaining agreements by 2025
 - Halving of moderate to severe household food insecurity by 2030
 - Halving childhood obesity by 2030

³² Department of Environment, Food and Rural Affairs (2018). Animal Feed Statistics for Great Britain – December 2017. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/679900/animalfeed-statsnotice-8feb18.pdf

³³ Jennings *et al.*, 2017. Risky Business: Understanding the UK's overseas footprint for deforestation-risk commodities <https://www.wwf.org.uk/sites/default/files/2017-10/Risky%20Business%20-%20October%202017.pdf>

³⁴ <https://www.euandgvc.nl/documents/publications/2015/december/7/declarations>

³⁵ HM Government (2018). A Green Future: Our 25 Year Plan to Improve the Environment https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

▪ **Halving the environmental impact of the food system, including halving food waste by 2030**

- Outline policies and proposals, indicators, milestones, metrics, resources and monitoring arrangements to report on progress against objectives.
- identify legislative gaps and secondary legislation or regulatory requirements a needed to deliver on the targets.
- Indicate how an impact assessment will be carried out, with the aim of assessing how policies and proposals impact the goals of the bill and the targets set out. In addition, an impact assessment should take a global perspective, assessing the ramifications on Scottish policies of any trade deals that the UK Government proposes, and our position in a globalised food system.
- Outline how it contributes to delivery of international commitments, including the Sustainable Development Goals, UN Convention on Economic, Social and Cultural Rights and in particular on the right to food, the Paris Agreement on climate change, the Convention on Biological Diversity and its Aichi Targets, Article 55 of the UN Convention on the Law of the Sea, international animal welfare standards such as the standards of the World Organisation for Animal Health, Article 13 of the Treaty for the EU, and which should be maintained in full should Scotland leave the EU, and the UN Decade of Action on Nutrition 2016-2025.
- Be developed in line with the EU Environmental Principles of precaution, prevention, rectification at source and polluter pays, which Scottish Government reaffirmed its commitment to maintaining in the concurrent Principles and Governance consultation.
- Specify how ministers and public authorities will collaborate on the development of policies that touch on the food system. This should be done with the help of an independent food commission. Structures and processes which allow them to do this, and place a statutory requirement on how this will function, should be set out in a Good Food Nation Bill.

In addition:

- Ministers and local authorities, in exercising any functions relating to Good Food Nation Policy or the food system and its impacts, must do so in a manner that ‘achieves the objectives’ set out in the Good Food Nation Bill and the statement/plan. We feel that, in order for framework legislation to be effective, ministers and public authorities must be required to do more than ‘have regard to’ the statement/plan.
- The government should consult on the content of the statement/plan. We are pleased to see this provision already in the consultation proposals.

We welcome the proposal of duties on public authorities to prepare statements of food policy. We would like to see these take on board and demonstrate how the objectives in the Nation Food Plan will be delivered. However, public authorities must be adequately resourced and supported in this work.

Q2 - 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?

WWF Scotland agrees that Scottish Government should enable and encourage businesses to play their part.

Food and drink manufacturing contributes £3.8Bn gross value added (GVA) to Scotland's economy, comprising 1015 businesses and employing 45,000 people³⁶. According to Scottish Annual Business Statistics, 2016, 3271 units were recorded under fishing, manufacture of food products and beverages³⁷. These figures exclude agriculture, which employed 66,000 people in 2018³⁸. Agriculture, fishing and forestry provide a combined 28% of employment across remote and accessible rural areas, with accommodation and food services provide a further 23% of employment³⁹. The environment from which food is produced underpins and adds to the reputation and value of the food industry as a whole, bolstering Scotland's international reputation as a leader in food and drink. Therefore, the industry has responsibility and imperative to produce and process food in a way that protects our natural resources for future generations.

At the production level, changes to agricultural regulations, incentives and support could have a huge positive impact on the sustainability of the whole food system, safeguarding our long-term food security and our right to food, while contributing to solving Scotland's most pressing environmental issues. To secure this, Scotland should adopt a 'public money for public goods' approach to support for agriculture and wider land uses. This will indeed enable and encourage food production businesses to make the transition to a sustainable food system. Our current food system's inability to sustain itself in the long-term is a form of market failure, and a public money for public goods approach can help to correct this.

Large retailers have a huge role to play in influencing consumer choices. Some are already starting to see that they have a responsibility to provide environmentally sustainable food to consumers, removing the guesswork from trying to make greener food choices. Last year, Tesco launched a partnership with WWF UK, with three key aims:

- Helping customers to eat more sustainably by halving the environmental impact of the average shopping basket
- Restoring nature in food production by supporting British farmers to work in harmony with nature and eliminating deforestation from products and ingredients
- Tackling waste by leading the food industry in eliminating food and packaging waste from the sector

This ambitious project is setting the standard for other large retailers to follow and making it clear that future successful business models must have sustainability at their heart.

Retailers like Tesco have the capital to invest in innovative partnerships like this, and the research required to underpin it. However, smaller businesses will require advice and support from Scottish Government to identify ways to make their business models more environmentally sustainable and climate resilient.

Q3 - To what extent do you agree with the proposed approach to accountability of Scottish Ministers and specified public authorities?

WWF Scotland strongly disagrees with the proposed approach to accountability. Policies and strategies are only as strong as their accountability measures. New policy must be accompanied by the appropriate structures, processes, expertise and resources to ensure that it is implemented. This is why we feel that a dedicated statutory body, such as an independent food commission, is required. It is difficult to see how progress could be

³⁶ Food and Drink Federation Scotland. Statistics at a glance. http://www.fdfscotland.org.uk/sfdf/sfdf_comp.aspx

³⁷ Scottish Government (2018). Scottish Annual Business Survey 2016. <https://www2.gov.scot/Resource/0053/00537061.pdf>

³⁸ Scottish Government 2018. Scottish Agricultural Census June 2018. <https://www.gov.scot/publications/results-june-2018-scottish-agricultural-census/>

³⁹ Scottish Government (2018). Rural Scotland: key facts 2018. <https://www.gov.scot/publications/rural-scotland-key-facts-2018/pages/4/>

measured, monitored, reported and assessed, at an appropriately cross-cutting level, through existing mechanisms.

Successful delivery of the Good Food Nation agenda will require cross-portfolio buy-in. To do this, we need a structure that oversees all policy development and delivery in the food system. A food commission could fill this function, ensuring that complementary policies are developed. A well-resourced statutory body can commission research, provide recommendations to government and keep an eye on our multiple, interrelated goals. This approach is essential if we are to meet our environmental, social and economic objectives.

Q4 - 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?

WWF Scotland strongly disagrees with the proposal for targeted legislation in the absence of framework legislation. We believe that both are needed.

Framework legislation is necessary for establishing food as a new policy area, and for ensuring that we take an overarching view of the food system. While targeted legislation may be necessary, we believe this must be driven and targeted by a framework law. We do not think that it will be possible to make fundamental changes to the food system through targeted legislation alone, as these are unlikely to secure the cross-portfolio approach required.

In addition, we need a framework law to align with other developing legislation and policy areas which underpin environmental interventions and protections. This legislation and policy area is being developed in the context of considerable change, both as a result of Brexit, and with multiple bills proposed or proceeding through stages. A Good Food Nation Bill must be developed in a way that is complementary to the aims of the Climate Change Bill and should be consistent with the proposals emanating from two key consultations for a Scottish Environment Strategy and on Environmental Principles and Governance in Scotland. We believe that an Environment Bill will be necessary, incorporating key environmental principles into Scots law, setting clear targets for the environment through an environment strategy, and establishing an environmental watchdog. The Good Food Nation agenda should be consistent with these principles, and have complementary targets. It should consider linkages with other relevant legislation such as the UK Fisheries Bill. Future Scottish Agriculture and Inshore Fisheries Bills should clearly nest underneath a Good Food Nation Bill, ensuring that Scotland's food production sectors contribute to meeting the headline targets in the bill.

CONCLUSION

Scotland could become world leading and set the global standard in sustainable, affordable, healthy and nutritious food and drink. However, a strong and ambitious framework Good Food Nation Bill, linking all areas of policy related to food and driving change, will be required to deliver this. These proposals are a good start but do not yet go far enough.

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