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RESPONSE TO THE SCOTTISH GOVERNMENT'S DISCUSSION DOCUMENT "BECOMING A GOOD FOOD NATION"

Background and Consultation

1. Nourish Scotland is a not-for-profit organisation campaigning for a fairer food system in Scotland. Nourish facilitates this change through engaging with organisations, community initiatives, politicians and officials. We work to influence policies from local to EU level and provide a platform for networking and sharing best practice. We make sure that food is brought to the fore in public debates of various kinds, making the link between a localised food system and its positive outcomes for economic development, community cohesion, job creation, skills development, public health, environmental stewardship and justice.
2. Nourish is pleased to be able to comment on the Scottish Government's paper "*Becoming a Good Food Nation*" (GFN). Nourish conducted 8 regional consultation meetings across Scotland in relation to the GFN document. The purpose of the meetings was to promote debate about how Scotland could become a GFN and encourage a wide range of well-crafted responses to the consultation. Notes and photographs of the individual regional meetings together with a summary of the consultation process and the themes which emerged are available on the Nourish website at <http://www.nourishscotland.org>. Nourish also produced a survey monkey for the consultation. The results of this are attached as Annex B to this paper and the notes on the consultation meetings are attached as Annex C. These consultation meetings have also helped to inform the Nourish response.
3. This paper sets out in some detail a suggested system of policy inputs, priority spending areas and outcomes, all operating within an international and national context. For ease of reference, a schematic diagram setting out this proposed food policy system is attached as Annex A to this paper.
4. None of the changes proposed in this paper will happen without Government being prepared to listen to and work alongside our producers and communities. Change will happen by working with these groups, not by doing things to them and imposing changes upon them from above. This kind of change requires a long-term commitment, a holistic view, and an ability to simultaneously progress multiple changes, at government, community and individual level. The scope of this challenge is not to be underestimated. However, the potential gains to be won are huge. We have a great opportunity to reshape our food policy, to develop thriving sustainable businesses and social enterprises making new products, to safeguard our environment and reduce our carbon footprint and to develop a healthier society where everyone can source, eat and cook with locally made and sustainably produced food.

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The Scope and Context of the GFN Document

5. Nourish recognises that food and drink policy in Scotland has undergone considerable development since the publication of “*Recipe for Success*”. In particular, we applaud the recognition that Scotland as a country needs to feed its people well and that people from all walks of life must be able to access fresh, healthy, affordable and tasty food. Nourish welcomes the shift in emphasis away from exports and economic growth to include the development of other socially just priorities. However, there remains an urgent need for our food policy to be anchored in the international context and for a far greater degree of policy coherence to be achieved within government policies and outcomes.

The International Context

6. Scotland is just one part of an international, global community. Many of our international institutions are already engaged in work relating to food. It makes little sense for Scotland to try and develop a food policy that does not reference or seek to dovetail with this on-going international work. Of all the issues that the Scottish Government works on, food must surely be one of the most international. In addition to Scotland’s proud record of export success, we are also a net importer of many foodstuffs. Much of our regulation and policy work flows directly from a European context, with the Common Agricultural Policy and Common Fisheries Policy having a huge impact on domestic policies and funding opportunities. We are also engaged in international efforts to limit our global environmental footprint, reduce carbon, achieve climate justice and assist developing countries in eradicating food poverty. Yet none of these issues is really referenced in the GFN discussion document.
7. There are several specific lines of international work that Nourish believes should form the basis of a coherent Scottish food policy. The first is the work of the UN in developing the new sustainable development goals. These [Sustainable Development Goals](#) are accompanied by targets and will be supported by indicators focused on measurable outcomes. Goal 2 is to end hunger, achieve food security and improved nutrition and promote sustainable agriculture. Targets under this goal include:
 - ending hunger and all forms of malnutrition and ensuring access by all people to safe, nutritious and sufficient food all year round
 - doubling the agricultural productivity and the incomes of small-scale food producers
 - ensuring sustainable food production systems and implementing resilient agricultural practices that increase productivity and production, help maintain ecosystems, strengthen capacity for adaptation to climate change, extreme weather, drought, flooding and other disasters, and progressively improve land and soil quality
 - increasing investment, including through enhanced international cooperation, in rural infrastructure, agricultural research and extension services
 - correcting and preventing trade restrictions and distortions in world agricultural markets and
 - adopting measures to ensure the proper functioning of food commodity markets and their derivatives, to help limit extreme food price volatility.
8. As a UN signatory, the UK, and Scotland, will be required to implement these goals on a national and international level. In due course, these goals will form part of our domestic policy as well as our international obligations. Nourish believes that they also form a reasonable starting point for developing our own food policies. In addition, our food and drink policy should surely form part of the Scottish Government’s response to the UN Secretary-General’s [Zero Hunger Challenge](#). In

this, the UN challenges all countries, organisations, academics and civil society to work together to ensure that:

- There are Zero stunted children less than 2 years old
 - There is 100% access to adequate food all year round
 - All food systems are sustainable
 - There is a 100% increase in smallholder productivity and income
 - We have Zero loss or waste of food.
9. The FAO has also been working on [14 themes](#) as part of its contribution to the new sustainable development goals. The themes are based on the Organisation's global goals – the eradication of hunger, food insecurity and malnutrition; the elimination of poverty; and the sustainable management and utilisation of natural resources. Current relevant themes include food security and the right to food, nutrition, resilience, climate change, fisheries and aquaculture, sustainable agriculture, and land and soil. A paper has recently been published setting out targets and indicators for [food security, nutrition and sustainable agriculture](#) and this forms another part of the international context, which our own goals should draw upon.
10. Scotland has recently published the Scottish National Action Plan on Human Rights. Despite the extent of international efforts above, and despite the right to food being recognised by the UN Committee on Economic, Social and Cultural Rights, the word food does not even appear in the plan. This seems a missed opportunity for Scotland to take the lead, both within the UK and internationally, and to demonstrate a commitment to feeding her own people adequately.

European Context

11. As noted above, many of our core agriculture, fisheries, food and environmental policies are negotiated and developed as part of the European Community. We should be seeking to influence these agreements and ensure that Scottish priorities form part of this policy backdrop. DG Environment has recently consulted on making the food system more sustainable. It is expected that as a result of this consultation there will be a [Communication on Sustainability of the Food System](#) at the end of 2014 / early 2015. The consultation covered aspects such as
- Better technical knowledge on the environmental impacts of food
 - Stimulating sustainable food production
 - Promoting sustainable food consumption
 - Reducing food waste and losses
 - Improving food policy coherence.
12. These are all issues clearly relevant to the development of any sustainable food and drink policy. In addition, both the common fisheries and common agricultural policies will require further negotiation on the provision of support beyond the current 2020 horizon. It is important that Scotland maximises any opportunities for research, grant funding, innovation and collaboration that may flow from these proposals.

Need for Policy Coherence

13. The GFN document recognises that there is a need for food and drink policy to interact closely with other sectors such as the NHS and local government to ensure effective co-ordination. However, Nourish believes there is a need for a more far-reaching policy audit to ensure other policies help us become a Good Food Nation. In addition to the policies listed below there are various action plans and legislative measures such as the biodiversity action plan, climate change duties and equalities duties that any food policy will require to dovetail with.

14. Policies that have an impact on food include:
- Our international obligations above
 - Agriculture, Environment and Fisheries, at EU, UK and domestic level
 - Land use/land reform
 - Planning
 - Climate change, biodiversity, and carbon reduction
 - Enterprise/skills
 - Education
 - Health
 - Social Security and welfare
 - Procurement
 - Smart Cities
 - Community planning and community development.

Outcomes

15. While the GFN document clearly sets out a suggested vision and priority policy and action areas, it is singularly lacking in specifying the outcomes to be expected or aspired to in our food policy. Without specifying clear outcomes, there is a risk that any policy flowing on from the document will be muddled, inconsistent and unable to be incorporated within the framework of our national outcome and single outcome agreements.
16. Nourish suggests that any food and drink policy should seek to achieve the following outcomes:
- Reduced hunger and malnutrition.
 - Better public health and reduced health inequalities.
 - Reduced GHG emissions from food chains.
 - Increased levels of natural capital both here and in countries where we source our food
 - A thriving community food economy with thousands of new jobs.

Priorities

17. Flowing on from these proposed outcomes there are 4 areas of work that Nourish believes should receive priority under the new food and drink policy. These are:
- building a community food economy,
 - delivering a cultural change programme,
 - making it easier to eat well and
 - supporting sustainable production and use.
18. To these, Nourish would also add a fifth priority, of ensuring policy alignment, supporting research and development to underpin these priorities, spreading best practice and reporting progress. These priorities are set out in more detail below.

Building a community/local food economy

19. To build a thriving local or community food economy our producers must have access to resources and an infrastructure that will support them. In order for local food to be grown, produced, manufactured or processed, this will require **access to land**. Nourish strongly supports the recent report of the Land Reform Review Group and welcomes the Scottish Government's continued commitment to a programme of land reform. Without land to grow there will be no local food.
20. Nourish also supports the provisions of the Community Empowerment (Scotland) Bill, which should improve the ability of community groups to access land, buildings

and resources that may assist food-growing enterprises. However, the government will also need to support communities in these endeavours and to ensure funding is available for land acquisition.

21. As part of our consultation process Nourish found a very real interest in **creating new and different models of doing food**. These models included small farmers and growers, social enterprises, community food groups and co-operatives. Another strong theme emerging from our consultation was the need to **actively invest in supply chain development** and other measures to create better connections between farmers, food and people. This may require support for new sustainable businesses and social enterprises, creation of specialist brokerage roles to help producers and buyers negotiate contracts or support for the development of producer co-operatives. One possible model that could be explored here is the development of local food hubs. Another model discussed was the creation of food buying co-operatives that could work like credit unions and provide finance and bulk-buying support for members.
22. Linked to this is the need to ensure that **adequate infrastructure** is there to support local food enterprises. There seems little point in supporting the development of a local food economy if the resulting produce requires to be sent vast distances for processing and returns only as anonymous food sold by a distribution company. In practice, this will require the provision of local abattoirs, bakeries, fish markets, dairies and retail opportunities. For example, when it comes to retail, Scotland lacks the provision of covered, year round food market spaces that could provide a focal point for local food sales.

Delivering a cultural change programme

23. Another theme expressed during our consultation was the need to ensure that everybody **understands what good food is and why**. Nourish supports the suggestion of reviewing and simplifying the definitions of good food, evaluating global best practice and expanding the Scottish evidence base. Nourish is aware that elsewhere in the Scottish Government the ISM **model of behaviour change** has been successfully employed and recommends that this is explored for the food context.
24. We need to embed this sense of what good food is through all our publicly funded services. In particular we need to **embed this understanding in public services that supply food**. While the actual spend may be a modest amount, there is a real opportunity to show leadership here and to develop sustainable local food enterprises. We need our schools, hospital, prisons, care homes and public sector workplaces to showcase tasty, healthy, sustainably produced local food and to explain what they are serving and why. With a **new sustainable procurement duty** embedded in the recently passed Procurement Reform (Scotland) Act there is an opportunity to make a step change in procurement practice. However, once again this will need to be **underpinned with resources, support and guidance**.
25. We also require a **values-based educational programme** that extends beyond schools. Children's food policy is undoubtedly important, but many people expressed fears during our meetings about the consequences of concentrating just on children's food. We need to invest time into training our teachers, social workers, health workers, caterers, housing associations, community development trusts and retailers about what good food is and why it is important. This should be more than classroom learning. We could provide, for example, a network of educational farms and producers who can host visits and show the reality of local food production.

26. There is potential to **build upon the fair-trade model** and our status as a fair-trade nation and extend our knowledge of sustainable food production in countries that we import from. This should ensure that our food choices do not just shift the impact of unsustainable food systems.
27. Another way of speeding the pace of change would be to increase the support available to the emerging **sustainable food cities network**. These partnerships bring together local authorities, health agencies, other community planning bodies, business and civil society groups to highlight food issues, make connections across different agendas and ensure joined up thinking on food issues. They provide an opportunity to influence food policy and priorities at a local level and raise the profile of food. Early work has taken place in Edinburgh, Glasgow and Renfrew, but as yet this is comparatively under-resourced in Scotland. For good food to happen on a local level, **food needs to become an integral part of the community planning process**. This would be greatly assisted by having an officer in each local authority that is recognised as having responsibility for food issues. The experience of Nourish in dealing with food issues is that, as a crosscutting issue, food is often regarded as something that someone else does.

Making it easier to eat well

28. Nourish welcomes the view in GFN that **good food should be available for all**. However, there is little in the document about reducing food and fuel poverty and ensuring that food is affordable. To do this will require both work to improve the availability and affordability of fresh, healthy, local food and work to regulate the promotion and availability of unhealthier choices.
29. It is difficult to address the issue of affordability without mentioning our **decreasing wages and increasing living costs**. Nourish believes that both wages and working-age benefits should be increased to ensure that making better food choices is an affordable option. Nourish also believes that if more can be done to encourage food businesses to pay the living wage, this will contribute to careers in the food industry being seen as attractive alternatives.
30. Nourish also believes that **healthier foods need to be made more available and accessible**. We would support, for example, the development and maintenance of community food hubs or co-operatives to facilitate buying fruit and vegetables, the provision of fruit and vegetables on prescription, the extension of the current healthy start and healthy living award schemes, and the extension of free, healthy, sustainably produced school meals. We think **that producers and processors providing tasty, healthy, sustainable products should be rewarded** by incentives, whether these be making grant capital available, providing tax rebates or otherwise supporting healthy choices. For example, businesses serving or selling healthy produce or fruit and vegetables could be offered business rates reductions as part of an incentive to reduce floor space given to unhealthier foods.
31. In addition, Nourish urges the Scottish Government to consider measures to **restrict the advertising, promotion or availability of high sugar products**. Nourish believes the current framework, which relies on voluntary compliance and support from big industry is unlikely to achieve wholesale behaviour change or substantially promote better food choices.
32. In itself, increasing the availability and affordability of good food will not result in behaviour change unless people know how to cook it and want to cook it. Our consultation events appeared to show a considerable unmet demand for a programme of life-skills, learning and continuing development around food. Nourish

would support the delivery, by the third sector and social enterprises, of an expanded **programme of growing and cooking skills and nutritional information**. This would be hugely assisted by having an increased number of kitchens available for community use where food could be prepared and eaten in a communal setting.

Supporting sustainable production and use

33. Nourish believes that more **support is needed for sustainable production** and use. Nourish was encouraged to see that farmers in receipt of public monies will now be required to complete basic carbon auditing. Nourish **supports the extension of the advisory services** available to farmers and growers to provide information and support, and distribute best practice on **sustainable farming practices**. As part of this, we need to invest in measures to **drive down waste** throughout the supply chain (including on farm and in manufacturing or processing). We also need to provide for the recycling of material to land wherever possible to continue a life cycle or circular approach to food production.
34. Nourish continues to encourage the Scottish Government to use our CAP, CFP and SRDP funds in a way that ensures every food producer is measured and rewarded for the jobs, environmental management, carbon sequestration and healthy food they help deliver. Nourish strongly believes that **where public monies are used to support farming, fisheries and rural development there should be a clearly articulated public benefit in return**.
35. The GFN document as it stands does not support organic farming practices and Nourish would welcome the **development of targets for organic food and farming**. Nourish also believes that programmes such as the House of Food in Denmark, which set challenging **targets for public procurement** of local, organic, produce have made a considerable positive impact and should be considered for use in Scotland.
36. In general, more can still be done to **support new entrants** to farming, community market gardens, and allotments and grow your own projects. The requirement under the Community Empowerment (Scotland) Bill for each **local authority** to produce a **food growing strategy** has the potential to assist this, but only if it is taken seriously and underpinned by appropriate guidance and reporting standards.
37. Finally, these new entrants to production will require appropriate support, **training, skills development and mentoring**. At present, few training programmes have an understanding of sustainable production and business practices at their heart. There is room for more values based training to fill this gap.

Ensuring policy alignment and reporting progress

38. In order to have a food and drink policy that flows through to all our government outcomes, the Scottish Government will need to establish **some policy co-ordination tools**. It would be possible for this to form part of the remit of a **Food Commission**. Nourish notes that there was lots of support during our consultation for the Commission being used a vehicle to co-ordinate and synthesise actions. There was also **support for it to have sufficient powers to be able to act as an effective agent of change** and to be able to help set a **strategic direction for food policy** in Scotland.
39. Nourish would also welcome the creation of a **high-level Ministerial group**. To have any hope of succeeding in becoming a Good Food Nation there will need to be

a cross-cutting group somewhere with the ability to resolve turf wars, deal with tensions between departments and individual objectives and ensure internal coherence. There is not a huge food policy community in Scotland and Nourish would welcome more funding and priority being given to food policy in order to create this kind of policy coherence. Other sectors such as carbon have developed **centres for innovation and knowledge transfer**, and consideration could be given to developing a centre of food policy excellence in Scotland.

40. There will also need to be a clear direction of travel, benchmarking, support for appropriate research (including collaborative research) and clear **indicators of success**.
41. Nourish would like to see an **annual report made to the Scottish Parliament** on the “state of Scottish food” outlining progress made in attaining the outcomes listed above. Nourish would also welcome an **audit of the current National Outcomes** to ensure that the importance of food related issues is reflected in these and is captured within the existing reporting mechanisms.
42. Scotland should draw **on measures and indicators** already being developed around the world, for example the work being done by the FAO to support new sustainable development goals includes the development of appropriate targets and indicators. One possible measure would be to adopt the [Food Insecurity Experience Scale](#) already in use by the FAO in more than 150 countries. The [FIES](#) consists of eight short questions that refer to the experiences of the individual respondent or of the respondent’s household as a whole. The questions focus on food-related behaviours and experiences and difficulties in accessing food and would provide a useful snapshot of internationally comparable data. Nourish has also been involved in early discussions with the Rowett Institute regarding the development of a **sustainable food index** and would welcome support for progressing such a tool.

Conclusion

43. Nourish welcomes the opportunity to respond to this discussion document. At a time when Scotland has been debating the type of country it wants to be, it has been heartening to see food taking its rightful place in the debate. During our consultation meetings we found a real interest right across Scotland in exploring food related issues and considering how food can play a part in making us a better, stronger, nation. The team at Nourish will continue our efforts towards making Scotland a Good Food Nation and we look forward to working with the Scottish Government to pursue this aim.