Q1. a) We are proposing a duty to advance Community Wealth Building, which form do you think this duty should take:

Option C

Please provide a reason for your answer:

This duty should also include a statutory requirement to include business, third sector and communities in the development of CWB strategies and action plans. With the recognition that many anchor organisations work at a regional level, such as Health Boards and some public food contractors, there should also be a requirement for regional collaboration. Furthermore, following the 'Place Principle', CWB strategies and plans should complement other local and regional plans, such the Good Food Nation Act food action plans, whilst also providing a supportive framework to underpin CWB principles within them.

Where applicable to their remit, the public bodies to which it has been deemed proportionate to be listed under the Scottish Specific Duties of the Public Sector Equality Duty and the Fairer Scotland Duty should also be covered by the CWB duty.

Q1. b) One way Scottish Government could support the implementation of the proposed Community Wealth Building duty is to provide statutory or non-statutory guidance. Would this be helpful to partners in meeting the proposed duty?

Yes

Please provide a reason for your answer:

Moving to a more equitable economic model won't happen overnight and not without comprehensive system change. For this reason we need to strike a balance between using statutory guidance to proactively steer key stakeholders towards CWB duties whilst also recognising that, using the 'Place Principle' as an example, there's no one-size fits all. For CWB to succeed it needs a true spirit of co-production and partnership, developed with input from public bodies, grassroots community groups, third sector interfaces and communities themselves, embedding action to tackle inequality sometimes found in place-based approaches. As highlighted in The Poverty Alliance's recent 'Get Heard Scotland' report communities must be engaged at the earliest stages of CWB. As such, the guidance should also include specific measures to ensure that marginalised groups, including women and Black and minority ethnic people, are supported to engage with CWB in their communities. These steps should include gender-sensitive consultation practices, such as active outreach to different groups of women, flexible meeting times, women-only spaces, childcare support, accessibility and different participation formats.

The guidance should identify the overarching CWB principles that everyone can aspire to and develop statutory guidance using these as a baseline, providing tiered levels of compliance. For example, within the 'Spending' pillar we would be advocating for short supply chains even though the definition of 'short' will be very different for a city or rural food growing area. We might therefore define short supply chains in terms of hyper-local, local, regional or national suppliers.

CWB guidance must also provide full transparency around who is accountable and what happens if delivery is not achieved. Indeed, CWB must be recognised as a cross-cutting agenda and embedded not only in economic policy, but also co-ordinated alongside the National Planning Framework (NPF4), in the National Transport Strategy (NTS2), in climate policy, the circular economy, participatory budgeting, land reform, community empowerment and other policy areas, as appropriate. The Community Wealth Building Bill should be seen an enabler to ensure that the wellbeing of people and communities are put at the heart of Scottish Government policy. It's certainly easy to get lost in the complexity of the policy landscape and, as such, any guidance needs to help partners understand the interconnectedness of Scottish policies and how, like the climate and nature emergency, CWB must a key thread running through government decision making. As an example of a tool to support this way of thinking, Nourish Scotland have recently developed a new food policy map that is inspired by London underground map. It shows the potential connectivity of policy initiatives, including community wealth building, and how to make the most of them. (Ref: https://www.nourishscotland.org/mapping-our-food-policy-landscape/)

Q2. a) Are there other non-legislative measures that you believe are required to accelerate the implementation of the Community Wealth Building approach in Scotland?

Yes

Please provide a reason for your answer:

Firstly, it's important to align the CWB framework more closely with Scottish Government's ambitions for nature and climate. This is important for two reasons. Firstly, it would connect the framework more strongly with the underpinning objective of creating a Wellbeing Economy – where nature is one of the five core pillars. Secondly, and more importantly, it would ensure that CWB approach does not accidentally undermine its core objective. In the long term, the climate emergency with increasingly unpredictable weather patterns are a core threat to Scotland's communities, particularly those living in rural areas. In this context, extreme weather events can quickly damage years of infrastructure investment and lead to business disruption. In the short term, disregarding climate and nature issues can lead to paradoxical outcomes. For instance, encouraging procurement of locally but unsustainably produced food and fish through CWB framework could at the same time inadvertently support environmental damage in each locality, undermining SMEs relying on ecological value of the area. Our recommendation is to make climate and nature issues more explicit within the existing framework.
Building community wealth in Scotland will of course mean changes to the way we do things, both at a micro and macro level. Whilst we expect these changes to be positive, people will need to be supported to embrace these changes - identifying good practice in each sector, supporting organisations to experiment with test and learn projects, training where needed, etc.

Effective communication and understanding around the core principles of CWB will be key to ensuring that they are fully woven into existing and future work streams and initiatives. Not only is this critical for public bodies, but also for private and third sector organisations who form the backbone of community ‘wealth’. Moreover, community wealth building as a bottom-up process/activity is a powerful counterpoint to seeing it as a top-down ‘gift’ to communities and language should reflect this, for example referring to ‘asset adoption’ rather than ‘asset transfer’ and ‘public provisioning’ rather than ‘public procurement’, etc.

For this transition to take place it will be important that local authorities and other anchor organisations seeing themselves as significant economic agents in the area. This will require a mindset change, away from the dominant austerity-driven cost-cutting approach. This will arguably not be easy in the current economic climate, yet it is necessary for the CWB approach to be successful. To ease the budgetary pressures, more of the typically nationally retained budgets could be transferred to local authorities. For instance 5-10% of the agriculture (CAP replacement) budget could be made available to local authorities and other public bodies to help with sourcing local and sustainable food for public kitchens, or investing in urban growing infrastructure such as glass houses (see Local Food Fund in Q2b below).

Collaboration and partnership with the third sector will also be vital if Scotland's anchor institutions are to successfully transform how they approach public procurement. One example of this is the Food for Life Scotland programme which provides local authorities with free support and expertise which enables them to pursue a Community Wealth Building (CWB) approach to the food that they source and serve. Through this certification scheme, Food for Life Served Here, local authorities are supported to serve more fresh, local and sustainably sourced food. The scheme is a good example of CWB in practice and research by the Soil Association has shown that every £1 invested by FFLSH certified local authorities over three years can give a social return on investment of £4.41 in value into the local economy.

Q2. b) Are there specific actions required to advance delivery of the items contained within the Shared Policy Programme outlined on page 11?

Yes

Please provide a reason for your answer:

Investment: Local Food Fund
Building community wealth in Scotland will need targeted investment to build a strong foundation for the future. In order to achieve this we would advocate for a specific Local Food Fund allocated directly to local authorities on a population basis to help them to invest their local food systems. Food is a community wealth asset in of itself and so this fund would be a key CWB mechanism by providing jobs in farming and crofting, including urban and peri-urban agriculture, whilst also supporting local food SMEs to provide employment and localise public procurement. In addition this could lead to helping to tackle the climate and nature emergencies through supporting organic food in the public kitchen, encouraging communities to grow on their land in towns and cities, supporting community-led shops, pantries, cafes, diners etc.

Furthermore, this would also be key to implementing the national and local Good Food Nation Act food action plans, and would be an important element of creating a more diverse and prosperous local food and farming system. This fund could be found by allocating a 5 -10% proportion of the agricultural budget that will be replacing the CAP fund.

Innovation: public diners
Public diners are state-supported restaurants which offer nutritious price-capped menus. They operated in the UK under the banner of ‘British restaurants’. At their peak in 1940s and 50s there were approximately 2,500 of these operating throughout the UK (twice the current number of McDonald's).

Public diners are by definition state-subsidised but they have a clear economic model. For instance, grants could be awarded to get these enterprises off the ground, but future funding could be conditional on the venues breaking even or tuning a profit. These diners could follow the tired and tested model of not-for-profit entities such as local leisure centres, or encourage new models of inclusive ownership, such as co-operatives. The idea of public dining already has a foothold in Scotland through many community cafes and social enterprises such as Kinning Park Kitchen.

Public diners could form an important part of building social as well as economic assets and wellbeing, offering nutritious balanced meals at very affordable prices, enhancing social cohesion and reducing loneliness. They would provide meaningful local employment and support local producers. In effect they are a perfect example of community wealth building and also have the potential to contribute to many of the Scottish Government's policy objectives including 20-minute neighbourhoods, ending the need for food banks, local food growing strategy, community empowerment, the Good Food Nation ambition, and healthy diets. They are firmly in line with the human rights centred approach which the Government wants to progress.

Climate/nature alignment: public kitchens
Strong targets in the Good Food Nation national plan will be crucial in encouraging public kitchens to serve more local and organic food. We would like to see the national plan include targets on organic production. There is strong evidence to show that organic food production systems lead to reductions in emissions from agriculture and an increase in on-farm biodiversity, which can help to deliver on the Scottish Government's net zero and nature restoration ambitions. Environmental sustainability is also at the heart of the CWB approach and organic food needs to be part of this economic transition.

The current review of Catering for Change guidance should be the driver for CWB for public food – the clear linkage of using guidance and documents to deliver statutory requirements needs to be more robust. Consideration could be given to making documents such as Catering for Change statutory in nature to ensure compliance and the enable the embedding of these principles in practice.
The Scottish Government has committed to doubling the area of land managed organically within this parliament (by 2026) and to working with the sector to develop a new Organic Food and Farming Action Plan. To achieve lasting growth within the sector, demand-side (pull) measures are required alongside supply-side (push) measures such as supporting farmers to convert. Setting a target for increasing the share of organic food within public procurement is one lever the Scottish Government can pull to increase demand for domestic produce. We are calling for the national plan to include a target of 5% of all public sector food spend to be on organic produce by 2030 and 15% by 2035. To ensure policy coherence across different pieces of legislation, the CWB Bill should also reference this target.

We would also like to see targets for local spend in public procurement of food. However, we need to ensure that we are collecting and collating the right data to ensure we can effectively measure success in relation to this target. We believe this may need legislative change. We expand on this point in our answer to Question 3.

A partnership approach to building community wealth

Sustainable Food Places (SFP) is a network of food partnerships which work on all aspects of the food system to solve some of today’s most pressing social, environmental and economic issues. Food partnerships bring together key stakeholders from right across the local food system, from the local authority, health board and public sector establishments to food growers, retailers, and the hospitality sector. To become a member of SFP, food partnerships must have the proactive involvement of their local authority.

SFPs are an excellent example of CWB as they take a place-based approach to food by shortening supply chains, supporting local producers and businesses, and effectively engaging with their communities. 15 of these food partnerships in Scotland covering almost half of all local authority areas and over three quarters of the population, and discussion already taking place in 10 other areas.

CWB needs to be at the heart of the national and local food plans, as set out in the new Good Food Nation Act, and food partnerships will act as a key delivery mechanism for these. The CWB Bill should recommend that there is a food partnership in every local authority area and that the CWB principles are used to guide the development of Good Food Nation food plans.

Community wealth building in the fishing sector.

In order for Community Wealth Building to address some of the needs of our coastal and island communities, Scottish Government need to ensure the responsible use of the public fisheries resource for public good (local jobs, sustainable and affordable food, ‘blue’ carbon sequestration, etc.) rather than allowing private companies to monopolise this shared resource and land catches abroad simply to turbo boost their own profits. See recent legal challenge to such actions: https://www.scottishlegal.com/articles/lord-ordinary-refuses-interim-interdict-against-change-to-scottish-pelagic-fishing-licence-conditions

This is also important in relation to salmon farms, which are often branded as local but are typically owned and operated by exogenous businesses. Depletion of local natural capital is exchanged for a product which is mostly exported, leaving little behind in terms of enduring community wealth.

Not only would this help recover our seas to provide greater resource availability, thereby shortening supply chains and encouraging sustainable food tourism, but also recover a public common which directly benefits all Scottish communities.

Not only would this help recover our seas to provide greater resource availability, thereby shortening supply chains and encouraging sustainable food tourism, but also recover a public common which directly benefits all Scottish communities.

Spending pillar

Q3. Are there ways in which the law could be changed to advance the spending pillar of Community Wealth Building?

Yes

Please provide a reason for your answer. :

We need change to legislation to enable a better approach to public sector food and drink data. To maximise the amount of public sector spend which is reinvested into Scottish and even more hyper local businesses, we need more accurate and detailed data on how money is currently spent. Whilst some data is currently collected by individual public sector organisations and industry bodies, such as Scotland Excel and NHS National Services Scotland, we need more detail and a uniform approach to the collection of origin information. A progressive step towards accurate data collection would be an amendment to procurement legislation to require origin information to be included as a requirement in public sector contracts. This should specify where food is produced in addition to the location of the supplier. Currently spend can be classed as “Scottish” if the supplier is based in Scotland. Whilst there is an economic benefit to sourcing from suppliers based in Scotland this does not necessarily provide an accurate reflection of the origin of the food or it’s supply chain. We should be aiming to source and serve more food that is both supplied from and produced in Scotland.

In addition to this, a requirement for this data to be reported to the Scottish Procurement Information Hub should be dictated in procurement legislation. Central collation of this data would allow for a more accurate picture of public spend to be gained and trends across the public sector identified and analysed. Decision makers could then access this data to ensure progress against community wealth building goals. It is currently difficult to access detailed origin data from the whole public sector in Scotland.

Procurement legislation should also be amended to give greater weight to community benefits, during the tender process. Specifically, sustainability and community wealth building should be prioritised over price where practical. Whilst the 2014 Procurement Reform Act created the sustainable procurement duty, which in theory required the contracting authority to consider the social, environmental, and economic wellbeing of the area where it operates. In practice this duty has achieved little. It has not transformed the way contracts are awarded because whilst social, environmental, and
economic issues are considered, price is usually weighted to be the determining factor in awarding contracts. If Scottish anchor institutions are to invest public procurement spend in a way which supports CWB, legislation should require that sustainability and CWB are prioritised above price in tender award criteria. Some mechanisms for this are already available, for example by stipulating numbers of local jobs, carbon weighting on transport, etc. - and these can also be used to help navigate the difficulty of stipulating ‘local’ - but they must form a core part of tender criteria.

More guidance should also be given to procurement professionals on sustainability in the food supply chain, including ensuring measures are in place to reduce food waste (measure, target and reduce). Tenders often only ask about food miles and whilst this is an important consideration, especially in the context of promoting local economic growth, sustainability in the supply chain is more much more complex than just where food is produced. Tenders should be designed in a way which promotes seasonality and traceability. Seasonality is a significant factor in the sustainability of a product and buying in season enables more local sourcing and can often save money. Traceability is equally important. With the requirement for public bodies to report on scope three emissions, it is important that contracting authorities develop a better understanding of the emissions associated with their food supply chains. This is often very difficult with complex global supply chains. Certification schemes such as organic offer guaranteed traceability. However, attention must also be paid to the fact that currently there are challenges around capacity and processing units, such as abattoirs – this needs to be addressed with urgency if we are to best support the Scottish food sector.

However, in order for legislation encouraging the higher weighting of sustainability and community benefits to be effective, contracting authorities must have sufficient funds to source from local and sustainable sources. With the current cost of living crisis and the record high food inflation, some local authorities who had previously publicly committed to pursuing a community wealth building approach have moved away from local and sustainable products in favour of more affordable options. It is important that a community wealth building approach in Scotland is sustainable and resilient to economic shocks so that it results in meaningful change rather than greenwashing. This will require investment. We have suggested a potential mechanism for this as a ‘Local Food Fund’ in Question 2b above.

Social enterprises and other community organisations are already practicing many of the principles of Community Wealth Building, by redirecting wealth back into the local economy and giving more control to local people, as well as running certain local public services. However, to ensure that CWB is front and centre, public spend should adopt a ‘local by default’ policy, enshrined in tendering criteria, with sectors such as public food, green space development, forests, local buses, home insulation, all having a presumption in favour of community delivery. Local community businesses, social enterprises and third sector organisations need long term investments and more flexibility, not short-term spending. To further empower communities in the use of public money for public good, participatory budgeting should be better integrated within the public sector spending, procurement and CWB frameworks.

CWB guidance must provide tools help to navigate current procurement legislation that precludes the specification of ‘Scottish’ or ‘local’. Some mechanisms for this are already available, for example by stipulating numbers of local jobs, carbon weighting on transport, etc. However, attention must be paid to the fact that currently there are challenges around capacity and processing units, such as abattoirs.

From conversations with local authority catering staff in was noted that current nutritional regulations can make it hard for some local products to be procured, e.g. products just over the allowance for sugar content. There was also support for broader nutritional regulation that also encompass planetary goals. An example of this are the Dietary Guidelines for the Brazilian Population which contain a full set of information and recommendations to ‘promote the health and well-being of people, families, communities, and the whole Brazilian population, now and in future.’ One of the principles guidelines is that priority is given to healthy foods come from environmentally and socially sustainable food systems.

In tandem there must be investment in small business support, such as effective Supplier Development Programmes, aimed at getting organisations onto the Public Contact Scotland system. There has been some good success in North Ayrshire around this, however this was down to a dedicated post which no longer exists. These systems of support also need to be developed in a such as way that they reinforce the principles of CWB alongside commitments to sustainable business practice.

B Better management of public contracts to ensure that Community Benefits are ringfenced for use on projects and initiatives that directly benefit communities. Public bodies should keep Community Benefits register and provide clarity and support of organisations wishing to apply. This should be a two-way street where third sector organisations, are also encouraged to co-develop and submit ‘wish lists’ to provide ready-to-fund projects, as already happens to some extent in Perth & Kinross; Community Benefit spend should be decided by communities, not contractors.

Workforce pillar

Q4. Employment law is reserved to the UK Parliament. Are there other devolved areas where the law could be changed to advance the workforce pillar of Community Wealth Building?
Yes

Please provide a reason for your answer. :
If CWB is truly to be a ‘re-wiring’ of current economic development practice, it is paramount that it runs through all other areas of Scottish policy and legislation.

For example, the changes proposed in the new Agriculture Bill should amplify the principles of CWB by ensuring that farmers and new entrants have access to appropriate training and development opportunities, are paid the living real wage and that opportunities for providing local employment are maximised. Changes to the agricultural subsidy system should work in favour of shorter supply chains, encourage co-operative models of working and provide support for growing local markets.

Scottish Government should expand Fair Work First conditionality to promote the objectives of the workforce pillar around the living wage and wider fair work practices.

One of the actions listed under the workforce pillar is anchor organisations and employers committing to fair work practices, including the payment of
In addition, the Scottish Government should explore how action to adopt the Living Wage Places approach could be embedded into CWB legislation. In 2019, over 50 local employers, including Dundee City Council, developed an action plan to make Dundee the UK's first Living Wage City. This involved committing to ensure all staff and subcontracted staff receive a Scottish Living Wage and setting a goal of doubling the number of workers covered by Living Wage accreditation in Dundee over three years. With support from Living Wage Scotland, the Living Wage Places model has subsequently been recognised in Edinburgh, Aberdeen and the Scottish Borders. The Living Wage Places model supports CWB as it promotes collective responsibility for fair work.

CWB must pay due regard to the needs of the migrant workers that form part of our new communities and play a vital role in the provision of good and services in Scotland. For example, fair work conditions should be required in all businesses gifted fishing licenses / public catch quotas by Scottish Government and an end to modern slavery aboard Scottish boats. This is especially prevalent amongst migrant populations who are often exploited, working in conditions that breach UK legislation on fishing industry working hours and for an average salary of £3.51 an hour, a third of Britain's living wage and a fraction of the share of the catch earned by EU and UK crew. (Reference: https://www.theguardian.com/environment/2022/jun/20/migrant-crew-uk-fishing-boats-abuse-exploitation-danger) There should also be the recognition that legislative and non-legislative solutions will be different whether looking at the fishing sectors on the East coast and those on the West coast and Islands. (Reference: https://matilde-migration.eu/wp-content/uploads/2023/01/supplement-to-d6-3-country-policy-report.pdf)

Likewise agriculture is a sector in which public contracting could be used to influence and improve fair work practices. Agriculture is considered a labour sector at 'severe' risk of worker abuse and exploitation. Added to this, the UK government introduced a new sector specific temporary migration programme through the 'Seasonal Worker Visa' (SWV) in 2019. The SWV is tied to a single labour recruiter and restricted to work in either poultry for up to 2.5 months or horticulture for up to 6 months. Temporary migration programmes such as the SWV are known to have a range of risks associated with their short-term nature, the visa sponsorship tie to an employer or single labour provider and the limited rights afforded to migrant workers. Workers on the SWV can be recruited from any country worldwide, further increasing their vulnerability. Risks to seasonal migrant workers in agriculture have been well documented in non-government and government reports since the introduction of the SWV, including deception, debt bondage, abuse, unsafe working conditions and with the intrinsic pressures to then being unable to meet the demands of larger suppliers. For example, Tayside Contract, Tayside's largest supplier of public food, is committed to

We know that many SMEs find it challenging to apply for apply for local public contracts and, alongside the overly bureaucratic process, this is often down to then being unable to meet the demands of larger suppliers. For example, Tayside Contract, Tayside’s largest supplier of public food, is committed to

Inclusive ownership pillar

Q6. Are there ways in which the law could be changed to advance the inclusive ownership pillar of Community Wealth Building?

Yes

Please provide a reason for your answer:

Amending Community Right to Buy and Asset Transfer legislation to simplify processes and/or allow a wider range of local community bodies to use these provisions.

We know that many SMEs find it challenging to apply for apply for local public contracts and, alongside the overly bureaucratic process, this is often down to then being unable to meet the demands of larger suppliers. For example, Tayside Contract, Tayside’s largest supplier of public food, is committed to
exploring how to bring smaller producers into contracts. However, their current model of working doesn't allow them the flexibility to have multiples of smaller suppliers that are unable to provide the quantity and regularity of supply needed to feed Tayside's schools, for example. Support and training needs to be available to explore collaborative networks of smaller producers, e.g. co-operatives, which would not only strengthen the resilience of the individual businesses but it would allow allow food produced locally to be served and eaten locally in our public kitchens.

The Community Supported Agriculture approach to local food production provides local people the opportunity to invest in their local food supply, financially, by volunteering time or both. A successful model throughout Europe, this increases local skills and employment, creates resilience in the local food system and can provide people a social network. These can work best when they are also supported by the council's investment, often to pump prime the growing sector and as a mechanism to mitigate against future food insecurity. Local social enterprises, co-operatives and community owned enterprises must become the standard, most common business models in Scotland, if Community Wealth Building is to truly succeed. Mainstream business support must then also be required to promote social enterprise and similar business models at every opportunity when providing business support to start ups, as well as established businesses. The asset transfer of both buildings and land to social enterprise and community ownership, must be fully realised, with a review of legislation to greatly boost local ownership.

Finance pillar

Q7. Are there ways in which the law could be changed to advance the finance pillar of Community Wealth Building?

Yes

Please provide a reason for your answer. :

Credit unions develop community financial power by facilitating local saving and lending. Legislation could support the development of credit unions to lend to small businesses, social enterprises, co-operatives and individuals that are often ignored by the mainstream banking system. Many community food projects in Fife sign up members to Credit Unions automatically.

The grant approach to supporting SMES and community organisations is fragmented and challenging and we need a fresh approach to support and enable communities to access funding. Indeed, leveraging funding for a commercial growing project is virtually impossible for anyone not already from a farming background.

Multi-year funding – and crucially for core costs - is essential for providing organisational and employment stability. Constantly applying for short term funding drains resource and moral, whilst also preventing local organisations from planning and developing their businesses long term.

We must also recognise that there are different models of CWB and that it's not just financial transactions that add wealth to communities. This is especially true in tight-knit or isolated communities such as on our islands where there still exists a vibrant bartering system around local products and services.

A Community Wealth Fund

The Scottish Government should introduce a national Community Wealth Fund, funded through compulsory developer contributions from e.g. onshore and offshore renewables and natural capital investments. To minimise geographic inequalities, the Community Wealth Fund should be distributed evenly across the nation, irrespective of contribution location, but funding decisions on allocations should be made locally.

The Fund should focus on delivering Community Wealth Building that:

- supports communities to acquire and invest in revenue generating assets creating long-term sustainable income for communities to invest in their own wellbeing;
- builds capacity for community asset ownership and business development

About you

What is your name?

Name: Simon Kenton-Lake

What is your email address?

Email: simon@nourishscotland.org.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?
Organisation:
Nourish Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:
Neither satisfied nor dissatisfied

Please enter comments here.: 

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:
Slightly satisfied

Please enter comments here.: