

Response ID ANON-72NM-1SP2-A

Submitted to National Good Food Nation Plan: consultation

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Introduction

Part A: Consultation on the national Good Food Nation Plan

1 Does each individual Good Food Nation Outcome describe the kind of Scottish food system you would like to see?

Strongly agree

Mostly agree

Mostly agree

Mostly agree

Strongly agree

Strongly agree

2 What, if anything, would you change about the Good Food Nation Outcomes and why?

Text box for you to provide views on what you would change about the Good Food Nation Outcomes and why:

Eating Better is a movement for change of sixty organisations working to accelerate the transition from producing and eating too much meat and dairy to a fairer, healthier and more sustainable food system that is better for animal welfare and for nature. These include Nourish Scotland, the Nature Friendly Farming Network, Pasture-fed Livestock Association, Soil Association, RSPB, RSPCA/RSPCA Assured, WWF, Good Food Institute Europe, Compassion in World Farming and many more. As an alliance of organisations covering multiple aspects of the food system, we believe in the power and potential of collaboration, systems thinking and policy coherence.

In relation to the draft outcomes, we believe these outcomes are mostly agreeable and cover numerous areas of the food system. They could be improved however, specifically:

Outcome 2 should be strengthened to take into account the global footprint of Scotland's food system and the environmental impacts of food production abroad, such as deforestation from livestock feed production. Suggest wording in line with Eating Better partner Nourish Scotland, 'Scotland's food system contributes to a flourishing natural environment both in Scotland and in the countries from which we import feed and food. It supports our net zero ambitions, delivers continuous improvement in animal welfare and reverses biodiversity loss.'

'Improving' animal welfare does not go far enough. Evidence from Eating Better alliance member Compassion in World Farming shows there are 16,103,906 factory farmed animals and 65 'mega style' farms in Scotland (mega farms are the largest factory farms in the UK) (CIWF 2024 - <https://www.ciwf.org.uk/our-campaigns/factory-farming-map/>). Animal welfare violations are prevalent in such systems and the Good Food Nation outcomes should be strengthened to enable a transition away from harmful intensive farming practices.

Outcome 3 does not fully reflect how poor Scottish diets are and the urgent need to make healthy, sustainable and affordable diets a reality. This outcome must be strengthened to reflect the need to change Scottish diets that are lower in sugar, salt, processed foods (including processed meat) and higher in fruit and vegetables.

Good Food Nation Measures

3 Do you think that these targets will contribute to achieving the overall Good Food Nation Outcomes?

Mostly disagree

4 Would achieving these targets contribute to making the kind of Scottish food system you would like to see?

Mostly disagree

5 If you have other comments on the suggested Good Food Nation targets, please comment:

Text box for you to include other comments on suggested targets:

Similar to the outcomes, these targets could drive progress toward the Scottish Government's Good Food Nation vision a reality. Despite this, there are significant gaps which mean that true food system transformation will not be possible without improvements. Specifically:

A key omission is a target for the reduction in meat and dairy consumption. The Scottish Government should provide the leadership to guide this complex area and give guidance to Scotland's food system. Land use, animal welfare, population health and farmer livelihoods are policy areas that can

be positively impacted by thinking differently about the types of food we are eating and producing in Scotland.

A lack of leadership from the Scottish Government risks unintended consequences and leaving certain stakeholders behind, such as Scotland's vitally important rural communities, crofters and farmers. By implementing a target to reduce meat and dairy consumption, the Scottish Government will be able to provide coherence to this area, monitor progress, understand the implications for different sectors and give structure to the transition. This will also link clearly to the development of Government policy related to a Just Transition. At the moment, its omission leaves a gap in the policy that will be filled by a business-as-usual approach to the food system, worsening poor diets and the food systems environmental footprint.

Whilst Eating Better's target of a 50% reduction by 2030 is ambitious, recent Food Standards Scotland research proposes that a 16% reduction could be achieved by restricting consumption to the current recommended level of 70g red meat per day. Similarly, the Climate Change Committee recommends that the Scottish Government aim for a 20% reduction in consumption of all meat by 2030, rising to 35% by 2050, and a 20% shift away from dairy products by 2030. A healthy and sustainable diet, underpinned by reductions in meat and dairy consumption, is one example where the Scottish Government can deliver multiple wins in their ambition to reach their Good Food Nation vision and would help achieve multiple outcomes in the draft plan.

There is no target or indicator related to animal welfare which is a significant omission, despite outcome 2 aiming 'improving animal welfare'. There is also no target for 'better' meat production in the food system that can enable Scots to access healthier and sustainable food options.

A number of the targets are already existing targets, and as a collection are therefore not ambitious enough. Alongside the lack of an overall pathway articulated about how to meet these targets, Eating Better is concerned that the existing proposed targets will not achieve the Scottish Government's vision for a Good Food Nation.

For further suggestions related to improving the targets, we support Eating Better alliance partner Nourish Scotland's list of proposed targets that would significantly improve the current plan.

6 Do you think these indicators will be useful for measuring progress towards the Good Food Nation Outcomes?

Mostly disagree

Text box for you to provide views on whether these indicators will be useful for measuring progress towards the Good Food Nation Outcomes:

Some of the proposed indicators will soon be invalid if not extremely hard to achieve, for example the food waste 2025 target.

There is no biodiversity indicator, despite the acknowledgement that "Scottish Ministers have international commitments to address biodiversity loss, articulated in the Global Biodiversity Framework of the UN Convention on Biodiversity, which includes targets relating to reducing the global footprint of consumption, global food waste, overconsumption and waste generation".

Outcome 2's indicator of 'The Scottish Dietary Goals' is vague. These are currently not aligned to sustainability. If this is referring to the 70g red meat/day target (and thereby achieving a reduction in the environmental impact of the national diet), then this should be made more clear.

7 What other indicators, if any, would you like to see included?

Text box to provide information on what other indicators, if any, you would like to see included:

If meat and dairy reduction is not a standalone target in the Good Food Nation plan (that would be our preference), then it should be one of the indicators (under outcomes 1, 2 and 3).

For further suggestions related to other indicators, we support Eating Better alliance partner Nourish Scotland's list of proposed indicators that would significantly improve the current plan.

8 If you have other comments on suggested Good Food Nation indicators, please comment:

Text box for you to include any other comments on suggested Good Food Nation indicators.:

Life in a Good Food Nation

9 Does this reflect what you think life should look like for a child in Scotland as a Good Food Nation?

Mostly agree

Text box to provide your view on whether this reflects what you would like your life to look like as a child in a Good Food Nation:

Add in sustainable, so it would read 'Eating and enjoying a healthy and sustainable diet is the norm for me'.

There is not enough recognition about the current prevalence of Ultra-processed foods (UPFs).

10 Does this reflect what you would like your life to look like, as a parent / carer in a Good Food Nation?

Mostly agree

Text box to provide your view on whether this reflects what you would like your life to look like as a parent or carer in a Good Food Nation:

Add in sustainable, so it would read 'healthy, sustainable and nutritious meals' and 'healthy, sustainable, nutritious and culturally appropriate food'.

11 Does this reflect what you would like your life to look like, as an adult in a Good Food Nation?

Mostly agree

Text box to provide your view on whether this reflects what you would like your life to look like as an adult in a Good Food Nation:

Change to 'I can easily access and afford food that I enjoy and that keeps me healthy and well'.

12 Does this reflect what you would like your life to look like, as a public caterer in a Good Food Nation?

Mostly agree

Text box to provide your view on whether this reflects what you would like your life to look like as a public caterer in a Good Food Nation:

This does not fully reflect the positive role sustainability can play in public procurement. There is not enough of an explicit mention of environmentally friendly, carbon negative/nature positive food. Public procurement policies that prioritise 'better' meat and dairy options in public bodies can set a leading example of how sustainable and healthy diets are possible in Scotland, such as organic or certified Pasture-for-Life.

Eating Better's Sourcing Better guide offers a clear pathway to the sourcing of 'better' meat and dairy, bringing benefits to the climate, nature, and the health and welfare of farm animals through responsible food service and retail sector sourcing.

https://www.eating-better.org/uploads/Documents/Sourcing_Better_Framework.pdf

Suggest adding 'My procurement choices help to support a variety of producers and enable a transition towards better meat and dairy production in the agricultural sector.'

13 Does this reflect what you would like your life to look like, as a retailer in a Good Food Nation?

Mostly agree

Text box to provide your view on whether this reflects what you would like your life to look like as a retailer in a Good Food Nation:

Retailers should go beyond 'helping consumers understand' and 'make the healthy and nutritious options' the same price or cheaper than unhealthy options.

Scotland's net zero ambitions need to include retailers supporting healthy sustainable diets - and a rebalancing of plant and animal protein sales (as per the WWF Basket target).

In addition, it should be clearer about where food waste needs to be minimised, as the majority of food waste happens on farm and in the home, not in stores.

Life in a Good Food Nation (cntd.)

14 Does this reflect what you would like your life to look like, as a restaurant owner in a Good Food Nation?

Mostly agree

Text box to provide your view on whether this reflects what you would like your life to look like as a restaurant owner in a Good Food Nation:

Recognise more explicitly sustainable food and the role restaurants can play in supporting local supply chains, and nature and climate friendly producers in supply chains.

15 Does this reflect what you would like your life to look like, as a farmer / crofter in a Good Food Nation?

Strongly agree

Text box to provide your view on whether this reflects what you would like your life to look like as a farmer or crofter in a Good Food Nation:

Suggest a minor addition to the third bullet point 'a variety of support, including training, advice and peer-to-peer knowledge exchange'.

16 Does this reflect what you would like your life to look like, as a fisher in a Good Food Nation?

Mostly agree

Text box to provide your view on whether this reflects what you would like your life to look like as a fisher in a Good Food Nation:

17 Does this reflect what you would like your life to look like, as a food processor in a Good Food Nation?

Mostly agree

Text box to provide your view on whether this reflects what you would like your life to look like as a food processor in a Good Food Nation:

On the second bullet point, include "with a focus on healthy plant protein such as beans and legumes."

Further comments on the national Good Food Nation Plan

18 If you have any further comments on the national Good Food Nation Plan, please comment here

Text box to provide any further comments on the national Good Food Nation Plan:

The Eating Better alliance is pleased to see this plan in consultation, and appreciates the work in bringing together numerous aspects of Scottish Government policy into the draft plan. We acknowledge the potential the Government's Good Food Nation vision has to transform Scotland's food system. 'Deliver a cross-departmental food and farming strategy' is the first action in Eating Better's Better by half: A roadmap to less and better meat and dairy. This roadmap to achieve a 50% reduction in meat and dairy consumption in the UK rightfully identifies Government policy as the main driver of change in food systems change. A cross-departmental food and farming strategy, which this plan could be, has the potential to help achieve this target.

People in Scotland want to see action on healthy and sustainable diets. According to a forthcoming Eating Better poll, over half (59%) of respondents in Scotland reported that they are willing to reduce the amount of meat that they eat whilst 62% think that having a sustainable diet will help achieve national food security.

As things stand however, the plan does not do enough to make this a reality. Specifically:

The National food plan should be the place where the Scottish Government defines what a healthy and sustainable diet is. This will provide different stakeholders across the food system with a working definition to enable coherence in the sector and ensure the Government is leading the conversation on dietary reform. It is important to recognise that there are competing visions for what a healthy and sustainable diet is and a business-as-usual approach will set Scotland backwards on its mission to become a Good Food Nation.

There are a number of examples in EU member states that show positive progress on the dietary transition, which would align well with the Scottish Government's ambition to remain aligned with the EU on a number of policy fronts. For example, the German Society for Nutrition updated its dietary guidelines and now recommends halving meat consumption, limiting dairy intake, and eating more plant-based foods (these comprising at least 75% of your diet). <https://www.bmel.de/EN/topics/food-and-nutrition/healthy-diet/10-rules-dge-well-balanced-diet.html>

The Danish Government's 'Danish Action Plan for Plant-based Foods' is a world leading example of a food plan that demonstrates how to increase plant-based diets, and the multiple economic, social, environmental and health benefits this can bring. https://fvm.dk/fileadmin/user_upload/Dokumentation/Danish-Action-Plan-for-Plant-based-Foods.pdf

Eating Better notes that there are no questions on the role of the Scottish Food Commission, and therefore no public consultation or engagement on the role and remit of it. This omission is concerning, as the Commission will have a vital role to play in ensuring that the objectives in the plan are achieved and that the Scottish Government is held accountable.

There are a number of food-related pieces of legislation going through the Scottish Parliament in this session, meaning that there are numerous opportunities to strengthen Scotland's food system. Strengthening the outcomes, targets and indicators in the plan will align Government food policy further and allow for greater policy coherence.

Part B: Consultation on specified functions for the national Good Food Nation Plan

19 Please let us know if we have missed any function falling within a specified description or relevant specified functions in the list

Use this text box to let us know if we have missed any function falling within a specified description / relevant specified function in the list:

We support Eating Better alliance partner Nourish Scotland answer to question 19.

20 Why do you think this specified function / function falling within a specified description should be added?

Text box to explain why you think your function should be added to the list of specified functions:

We support Eating Better alliance partner Nourish Scotland answer to question 20.

About you

What is your name?

Name:

Andrew Stark

What is your email address?

Email:

andrew@eating-better.org

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Eating Better

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?:

Slightly satisfied

Please enter comments here.:

There was not an introductory text box to outline who the Eating Better alliance are and why we are interested in the Good Food Nation consultation.

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

Slightly dissatisfied

Please enter comments here.:

Cannot pullet point or make text italic, so it is not as clear as I would like it to be.