



Rural Affairs, Islands and Natural Environment Committee

Good Food Nation (Scotland) Bill

Summary

Which? welcomes the opportunity to submit evidence to inform the Committee's scrutiny of the Good Food Nation (Scotland) Bill and broadly supports the intent of the Bill to require Scottish Ministers and relevant public authorities to develop good food nation plans.

However we think that the Bill needs to be more ambitious in responding to the many challenges currently facing the food system – from climate change to obesity and the impact of rising food prices - and set out more explicitly the main purpose of these plans, along with specific goals, in order to ensure that there is a joined up approach and agreement at a national level on how different parts of government should be contributing to the transition to a healthier and more sustainable food system. It should also make provision for the necessary legislation to support this.

There would also be great value in establishing an independent Commission to oversee the delivery of the national and local food plans and ensure progress towards achieving the high level goals and targets that we think need to be in this Bill.

Introduction

Which? welcomes the publication of the Good Food Nation (Scotland) Bill and the opportunity to make suggestions to the Committee on how it could be improved.

The food system is facing a number of fundamental challenges that are impacting on consumers now and could have huge implications for our food choices in the future. Despite the Scottish Government's focus on trying to improve diets over a number of years, most people's diets are too high in fat, sugar and salt and as a result Scotland has one of the highest obesity rates in the world and unacceptably high rates of diet-related diseases. But the current food system is also having a disastrous effect on the planet, with food and agriculture major contributors to greenhouse gases and climate change, as well as wider environmental impacts such as biodiversity loss.

In the more immediate term, the implications of the UK's exit from the EU as well as the impact of Covid-19 have raised challenges for food system resilience – as well as for future food standards. Food prices have risen significantly and consumers have been faced with food shortages because of disruption to some supply chains. Alongside wider cost of living increases, this means that people on lower incomes are being hit particularly hard. Our most recent consumer insight tracker from November 2021 shows that 70% of people across the UK are very or fairly worried about food prices.

Tackling these issues requires a fundamental transition to a healthier, more sustainable and resilient food system. This is also a crucial time to be focused on this transition as we hopefully recover and rebuild from the pandemic. Covid-19 has had a fundamental impact on the food chain, many parts of the food industry and people's relationship with food, including increased food insecurity.

The UK's exit from the EU has also brought a focus on how food policy and regulation is determined. The UK is negotiating new trade deals for the first time in decades, raising challenges for the type of food standards the UK nations have in the future and how what we import supports or hinders the move to healthier and more sustainable choices. As food price inflation hits people's pockets, the industry and government response will also play a crucial role and either support or undermine efforts to enable healthy, sustainable and also affordable food choices.

Against this backdrop, we think that the Good Food Nation (Scotland) Bill is too passive. It needs to be more ambitious and more directly establish a framework for the urgent transition that will ensure a joined up approach across the whole of government.

Consumer expectations

Which? has conducted a range of research on Scottish consumers attitudes to food over recent years which reinforces the need for government leadership to tackle these challenges. Our most recent body of research has reinforced how important food and food standards are to consumers, how consumers want support in making more sustainable food choices – and also how food prices and affordability are an increasing concern.

A recent survey on sustainability issues from June 2021 has shown that Scottish consumers think that the government and businesses should be doing more to support the transition to net zero and to make it more difficult to choose options that are not sustainable. Three-fifths (58%) of Scottish consumers don't think supermarkets are doing enough to support consumers make more environmentally sustainable food choices, for example. People see affordability and confusing advice and information as among the key barriers preventing them from making more sustainable choices¹.

Our previous research on barriers to healthier eating has also highlighted how consumers expect more action from government and businesses, including actions to increase the availability of healthier options, make them cheaper and to tackle marketing and promotions that encourage unhealthy choices.

Maintaining food standards is also important for Scottish consumers in the light of the UK revisiting its approach and agreeing trade deals with a wide range of countries that have very different food standards. In June 2020 we conducted the National Trade Conversation which involved in-depth deliberative dialogues about trade policy in 5 locations, including the East Coast of Scotland. We followed this up with a representative survey that enabled us to look at views across the UK, as well as in Scotland specifically. We reconvened many participants from the National Trade Conversation again this year to consider how the UK had been approaching trade deal negotiations. The research in both 2020 and 2021 showed clearly that maintaining food standards and environmental protection were viewed as the

¹ <https://www.which.co.uk/policy/sustainability/8178/supporting-consumers-in-the-transition-to-net-zero>

main priorities for Scottish participants, along with ensuring all parts of the UK benefit from what trade deals can deliver and protecting data and digital rights. People thought that fairness of how we trade was important and they wanted the government to avoid a two tier system, where cheaper imports were permitted that were produced to lower standards, to the detriment of consumers, particularly those on lower incomes who would always have to buy based on price but with fewer protections. People also wanted to ensure that local producers were supported.

A survey of Scottish consumers in November² also asked about food price increases and found that 67% of people in Scotland said they have been affected by increased food prices in the last three months. This was evenly spread across different groups of consumers. 77% said that they were very or fairly worried about food prices (30% very worried and 47% fairly worried).

When we asked the 67% who said they had been affected by increased prices how they were responding, 47% said that they were buying cheaper products, 45% were shopping around in other supermarkets, different stores or online, 40% said that they had bought extra items when on promotion and 39% had bought similar products from cheaper brands. Worryingly, 12% said that they had gone without or skipped meals and 7% said that they had prioritised meals for other family members.

This research helps to demonstrate how decisions about food policy really matter to consumers and how they are expecting leadership from government to support them in making healthy and sustainable choices and upholding the principles and values that are so important to them and which they associate with UK standards – including animal welfare and environmental protection, as well as food safety.

Committee's questions

- **What is your view about the scope of the Bill? What else, if anything, would you have liked to see included in the Bill? Please explain your reasons.**

The Bill's purpose is to require the Scottish government and relevant authorities, such as health boards and local authorities to create good food nation plans to support social and economic wellbeing, the environment, health and economic development. We consider that the development of these plans could be valuable, but the Bill also needs to set out the more fundamental purpose of these plans and specific targets relating to the above issues, as well as wider objectives for the Scottish food system. It also needs to ensure that there is agreement on the high level objectives of Scottish food policy across government so that all related policies are aligned. This includes economic, environment, health, social, education, agriculture, competition and consumer policy for example.

We do not consider that the Bill reflects the urgency with which action is needed to tackle the food system challenges we have highlighted above – or create the right instruments and incentives to drive the change across government and the actors across the food system that

² Yonder, on behalf of Which?, surveyed a nationally representative sample of 1153 Scottish consumers in an online poll in November-December 2021.

will ensure a shift to a healthier and more sustainable food system that will support all consumers in making healthier and more sustainable food choices.

- **What is your view of the decision not to incorporate the 'right to food' into Scots law through the Good Food Nation Bill? Please explain your reasons.**

The Bill indirectly refers to the right to food by referencing relevant international instruments that Scottish Ministers must have regard to including the International Covenant on Economic, Social and Cultural Rights. It should directly refer to the right to food as part of the objectives for the food system and whole of government approach we consider is needed within the Bill. If this is not done, the Bill creates unnecessary ambiguity about what the intention is and the extent to which Scottish Ministers stand by the provisions within these instruments.

- **How should the Bill and/or the Good Food Nation plans link to other food policy initiatives, for example the current process of producing a [Local Food Strategy](#), and addressing global impacts of food and drink supply chains – for example taking up any of the [Global Resource Initiative recommendations](#)?**

The Bill needs to set out the overarching purpose and targets for food policy and therefore the national and local plans. It should also be the mechanism for bringing in the necessary legislation to enable the government to support and incentivise systemic change to the food system in Scotland, while taking account of how this relates to the wider UK and global food systems. Local food strategies need to be developed within this national framework to support the approach and targets set out within the Bill, but these need to go much wider, reflecting the global nature of supply chains and addressing the complexity and often competing interests across the food system. Conflicting interests and trade offs need to be directly addressed – for example food that may be important for local economies but is not healthy or sustainable or food imports which may bring more choice and lower prices but which come from countries (or multiple countries) that have very different food systems that are not aligned with national efforts to support a shift to more sustainable food.

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

Rather than leaving the outcomes to the good food nation plans, we think that these, along with national targets, need to be set out directly in the Bill in order to establish the level of ambition and pace of change that is now needed.

As set out below, we think that meaningful public engagement will be valuable, but the outcomes and targets need to set out the 'shifts' that are required to transform the food system including in terms of:

- sustainable farming systems and balance of production
- reductions in greenhouse gas emissions from key sectors within the food system
- sustainable sourcing of inputs and ingredients, including for imports
- changes that are needed to consumption, including reduced meat consumption and a shift to plant-based diets

- reductions in food waste at key stages of the system
 - changes that are needed to align marketing and promotional practices and ultimately sales with goals for a healthy but also sustainable diet
 - resilience of key supply chains
 - provision of food to the most vulnerable, including in emergency situations or when the food system faces shocks that disrupt supplies and availability
 - reductions in household food insecurity and support for financially vulnerable consumers
 - improving food safety and tackling antimicrobial resistance
 - maintaining food quality standards, including ensuring food authenticity and prevention of food fraud
 - wider values that underpin the food system including fairness of supply chains and animal welfare standards.
- **The Bill requires that Scottish Ministers and 'relevant authorities' must, when exercising a specific function or a function falling within a specific description, have regard to the national good food nation plan. Those "specified functions" will be set out in secondary legislation. In your view, what should those functions be? Please explain your reasons.**

Many policies and decisions across government and local authorities will shape the type of food choices available to consumers. The Bill needs to ensure that there is a joined up approach, aligned around common objectives across the entirety of government. Up until now, food policy has largely been secondary to other interests or other policies have determined food policy by default, including economic and agricultural policy. The functions of Ministers and relevant authorities therefore need to be broadly defined so that their core business is within scope and there is a requirement across all departments and authorities to ensure they are not only having regard, but actively supporting the objectives of the food plans in order to achieve the cross-governmental targets that we consider should be established within the Bill.

- **The Bill does not provide for a body to oversee how the Scottish Government and 'relevant authorities' are implementing the Bill; what is your view on this? Please explain your reasons.**

Many policies at national and local level will have an impact on food and so we consider that an over-arching, multi-stakeholder group or Commission that can oversee and monitor the delivery of the targets we think should be established within the Bill, as well as how good food nation plans relate to this, should be established.

- **What impact will the Bill have for local authorities and health boards?**

The Bill should require local authorities and health boards to establish good food nation plans that reflect the national plan established by Ministers. This seems a lengthy and potentially indirect way to address some of the urgent challenges that require a collective effort – particularly issues around improving health and tackling climate change. Unless the Bill is more explicit in what the overriding purpose and objectives of the national as well as public authority good food nation plans should be, while allowing for related local circumstances and priorities to be taken into account, there could be a lack of focus and too fragmented an approach.

- **Does the Bill provide for opportunities to participate in the production of national and local good food nation plans? You may wish to consider, for example, how the views of vulnerable people or those whose voices are seldom heard would be sought.**

The Bill requires consultation on the national and local good food nation plans, which is positive. However we think that as the issues that the plans need to address are complex and involve some complicated trade offs, there needs to be much more meaningful public engagement. We have set out some of the deliberative research that we have recently conducted on trade policy. We have previously conducted similar dialogues focusing on challenges facing the food system and this type of engagement would be valuable in shaping the plans, as well as ensuring ongoing public interest and engagement in their delivery – and ultimately support more sustainable food choices.

January 2022

Which? is the UK's consumer champion. As an organisation we're not for profit - a powerful force for good, here to make life simpler, fairer and safer for everyone. We're the independent consumer voice that provides impartial advice, investigates, holds businesses to account and works with policymakers to make change happen. We fund our work mainly through member subscriptions, we're not influenced by third parties and we buy all the products that we test.