

Scottish Parliament's Rural Affairs, Islands and Natural Environment (RAINE) Committee consultation on Good Food Nation (Scotland) Bill – call for views

Response from Scotland Food & Drink 11 January 2021

1. 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.

As the industry leadership group tasked with driving responsible growth for the sector, Scotland Food & Drink is broadly supportive of the Bill and considers the scope to be comprehensive.

The requirement for Scottish Ministers to prepare and publish a national Good Food Nation plan and for certain relevant authorities, including local authorities, to prepare their own plans will support the existing model of collaboration between Scottish Government, industry and local authorities by further increasing clarity around and alignment between national, local and industry priorities.

Scotland's existing collaboration model on food and drink is unique, robust and highly productive. For the last ten years, food and drink industry organisations, Scottish Government and its agencies have worked together, through the Scotland Food & Drink Partnership (SF&D), with the shared ambition to grow the reputation and value of the industry. The framework described in the Bill has the potential to fit effectively with this collaboration model and to underpin the sector's Ambition 2030 growth strategy, which is delivered collectively by the SF&D Partnership.

In particular, the greater alignment of local and national strategies potentially delivered by the Bill can be supportive of a strong local food culture and local supply chains in Scotland, which were highlighted in the SF&D Partnership's Recovery Plan for their potential to fuel Scotland's economic recovery and strengthen communities. Business growth in local markets can also act as a foundation for growth into UK and export markets. With this in mind, there may be attractions to a limited expansion the scope of the Bill to introduce a requirement that all Good Food Nation plans build further on existing public sector procurement initiatives to include a duty for all public-sector bodies to consider Scottish suppliers for each product category they purchase. In addition, a requirement on local authorities to report annually on the levels of food and drink procurement from Scottish suppliers would be welcome.

2. 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.

We are supportive of the decision not to incorporate the ‘right to food’ into Scots law through the Good Food Nation Bill, and also supportive of the rationale set out in the Policy Memorandum accompanying the Bill. Whilst we understand the perspective of the organisations that campaigned on the ‘right to food’, we believe that this right is better explored in the wider context of the Human Rights Bill.

3. 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?

For the Bill to be effective and achieve its policy aims, it should align clearly and coherently with existing and forthcoming policy and industry initiatives, including the Local Food Strategy. This means avoiding duplication, ambiguity, added complexity and burdens on both businesses and public-sector bodies as they continue to grapple with the demands of Covid-19 and EU exit.

The Bill requires Scottish Ministers’ and relevant authorities’ Good Food Nation plans to set out the ‘main outcomes in relation to food-related issues which [they want] to be achieved’. For Scotland Food & Drink and our members and partners across the public and private sector, these outcomes must include the sustainable growth of food and drink businesses from micro to large and across all regions of Scotland. It is therefore important that the Good Food Nation plans link to the Local Food Strategy’s 3 pillars of connecting people with food, connecting producers with buyers, and harnessing the buying power of public sector procurement, and facilitate:

- more opportunities for local suppliers – through, e.g., public procurement obligations, award of contracts, and licensing of local shops or events,
- fair prices for high-quality local produce
- backing the growth of local food and drink businesses through wider support and policies, e.g. grants, application of planning regulations.

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

We are currently leading a collaborative process to refresh the Scotland Food & Drink Partnership’s industry growth strategy, Ambition 2030, with the aim to launch in the autumn of 2022. We will consult with a wide range of stakeholders to produce a comprehensive strategy, delivered in partnership with the Scottish Government, that

drives responsible growth, improves the health of the nation, and protects and values its natural capital.

The outcomes, indicators and policies included in the national and local Good Food Nation plans should align and support the priorities set out by the Partnership in the refreshed strategy. This would ensure that industry, public sector and third sector pull in the same direction and avoid duplication of effort.

We believe it would also be beneficial for national and local Good Food Nation plans to consider provisions for reporting on local sourcing, where appropriate. Greater clarity on levels of local sourcing around Scotland could usefully inform action to better harness the buying power of public procurement, and feed into local food production and provision.

Another option for supporting local food and drink provision and production is for national and local Good Food Nation plans to require due regard to, or compliance, with a National Food Charter when providing licences or contracts. The existing document, Scotland's Food Charter for Events, which has been used in the past for major international sports events in Scotland, could provide the foundation for an updated charter.

5. 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.

As the Bill suggests, food-related issues can have far-reaching outcomes, including on social and economic wellbeing, the environment, health and economic development (and vice versa). Therefore, the range of specified functions set out in secondary legislation could potentially be very broad. For us, in our specific role as the industry leadership group driving responsible growth, the following functions are a priority:

- Route-mapping for the just transition to net zero – including ensuring that the key just transition plans take into account the national good food plan and afford fairness around access to and production of local food, including primary producers.
- Functions relating to the procurement and sourcing of food in the delivery of health and care, education and other public services, in order to build further on existing initiatives in this sphere
- Functions relating to licensing for large-scale events or businesses
- Planning regulations and the application of those regulations
- Provision of support to businesses and community groups (such as Scotland's Regional Food Groups).

All these functions have a strong food angle, and could be used to support green recovery and sustainable growth in a sector that reaches into every region of Scotland – in turn supporting vibrant communities and social and economic wellbeing.

6. 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.

As stated in our response to Q1, the Scotland Food & Drink Partnership is a unique and productive model of collaboration between government, government agencies and industry.

This model of collaboration has driven responsible growth, best practice, new opportunities and the sector’s strong reputation at home and abroad. It has also been an effective mechanism for delivering cross-cutting Scottish Government priorities – both through large-scale initiatives such as the Recovery Plan and through the delivery of specific programmes such as the Reformulation for Health programme, which supports SMEs to make some of Scotland’s most popular food and drink products healthier and is highlighted in the Bill’s Policy Memorandum.

Given the success of this collaboration model and existing implementation infrastructure, we do not see benefits from setting up additional bespoke structures to monitor and oversee the Bill.

7. What impact will the Bill have for local authorities and health boards?

The Bill’s requirement for certain public authorities, including local authorities and health boards, to publish a Good Food Nation plan, and have regard to the national Good Food Nation plan when doing so, is potentially very positive. It can bring them closer to the collaborative work being done across the Scotland Food & Partnership and help them to align their activity with it. This could apply across a range of issues from the sector’s Net Zero commitments to business support to licensing / planning activity to food and drink education in schools, with potential positive impacts on social and economic wellbeing, the environment, economic development and health.

Secondly, the Bill requires relevant authorities to have regard to the scope of food-related issues to affect outcomes on those four areas when preparing their good food nation plans. This too is welcome. It can help to raise the visibility and understanding of a sector that generates around £15bn annually for Scotland, with around 17,000 businesses employing over 120,000 people. pre-pandemic. The sector should be an integral part of local authorities’ economic, social and environmental planning post-pandemic, and this Bill could help to effect that.

8. 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.

We note that the Bill requires Scottish Ministers and relevant authorities to publish and consult on a draft of their Good Food Nation plans and to have regard to any responses to the consultation; those consulted are to be 'those who [they] consider appropriate'.

A key consideration must be the inclusion of food and drink producers in the production of Good Food Nation plans – in particular SMEs which make up over 90% of food and drink businesses. In order to maximise local participation and positive impacts from these plans, we therefore suggest that local authorities, health boards and other relevant authorities be required to include local food and drink businesses and business groups in their consultations.

One existing mechanism for this would be Scotland Food & Drink's 18 Regional Food Groups, funded by the Scottish Government. These already bring together local producers, businesses and other people and organisations interested in growing local food economies to help grow local businesses, develop regional identities and spend on local food. They would therefore be an ideal mechanism to ensure the participation of local 'grassroots' food and drink stakeholders in the production of local Good Food Nation plans and in building a thriving and fair food culture in Scotland.