



Scottish Government Consultation on Good Food Nation Proposals for Legislation
Consultation Response from the Soil Association Scotland
April 2019

Question 1: To what extent do you agree with the framework proposals for Ministers and public authorities to prepare statements of policy, have regard to them in the exercise of relevant functions, and report on implementation, with regard to international obligations and guidance?

Agree.

Soil Association Scotland believes the purpose of the Good Food Nation legislation should be to create awareness of and normalise sustainable diets. 'Sustainable diets' is an approach which addresses complex issues within the food system as a whole. The policy statement should draw on the elements of sustainable diets to develop an agreed definition of good food. This statement should make a commitment to serving sustainable diets, and therefore good food, and outline actions to deliver on this commitment.

A recent Lancet Commission report described the common drivers behind obesity, undernutrition and climate change. People in every country and region worldwide could be affected as these have other consequences including the unsustainable environmental damage that the food system imposes on natural ecosystems and increased inequality. The poorest people in society bear a disproportionate burden of ill health and the impacts of climate change. A systemic approach to food can help simultaneously tackle the common drivers behind obesity, malnutrition and climate change. Diets are inextricably linked to both human health and the climate: the food system can nurture human health and support environmental sustainability. It is currently threatening both.

Sustainable diets bring all these issues together and demonstrate a way of eating that tackles the many cross-cutting issues in the food and farming systems. For diets to be truly sustainable and to tackle a range of problems our current food system has created, the sustainable diets approach incorporates the following values:

- Quality: taste, seasonality, authenticity
- Social values: identity, religion, animal welfare, skills, cultural appropriateness
- Environmental: safe guarding biodiversity, protecting soils, reducing climate impact of food production
- Health: including safety, nutrition, social determinants of health (access), education and protection from marketing
- Economy: resilience and efficiency of supply chains, decent pay and working conditions, fully internalised cost
- Governance: evidence-based policy, democratic accountability, transparency and trust between actors in the food system and citizens.

There is a strong link between the above values and the seven aims of the Good Food Nation vision outlined in the consultation document. Therefore, sustainable diets should be the foundation of the Government's Good Food Nation framework proposals. This holistic approach to food will also help deliver on many of the outcomes in the National Performance Framework and on the Scottish Government's commitment to the Sustainable Development Goals.

For example, the public procurement of sustainable food is an effective mechanism for transforming food production and supply by widening public access to healthier, higher animal welfare, local and organic food, whilst building stable markets for farmers and growers. Public bodies should be leading the way in how they procure 'public food'.

By serving up sustainable diets, the public sector can address diet-related health inequalities. The public plate feeds some of the most vulnerable people in society, in hospitals, prisons, schools and care homes. The public sector can create environments in which it is normal, easy and enjoyable for everyone to eat well, thus contributing to tackling health inequalities.

Through our Scottish Government funded Food for Life programme we are showing how local authorities can serve good food in schools, using the Food for Life Served Here (FFLSH) award as a framework for delivering sustainable diets. The following shows how sustainable diets can practically be delivered by public sector bodies using the criteria from the FFLSH award:

Quality

- ❖ At least 75% of dishes are freshly prepared from unprocessed ingredients
- ❖ Menus are seasonal and in season produce is highlighted. In-season means eating food at its best. It is often more affordable too. If food is seasonal it becomes far easier to source fresh produce locally.
- ❖ Students can be involved with identifying popular healthy dishes

Social values

- ❖ Meat is from farms which satisfy UK animal welfare standards, including free range poultry and pig meat. Examples of farm assurance schemes are Organic, Red Tractor Assurance and Quality Meat Scotland and the RSPCA assurance scheme.
- ❖ Eggs are from free range hens: although EU animal welfare regulations have banned conventional battery cages, they still permit the use of 'enriched' cages which do not allow the birds to express their natural behaviour and fall far short of acceptable animal welfare standards
- ❖ Menus provide for all cultural and dietary needs
- ❖ Catering staff are trained in fresh food preparation and understand why good food is important

Environmental sustainability

- ❖ Certified organic ingredients and produce are used in menus
- ❖ No fish are served from the Marine Conservation Society 'fish to avoid' list
- ❖ Fish is certified sustainable by the Marine Stewardship Council. Overfishing has caused one third of all fish stocks worldwide to collapse, and scientists are warning that if current trends continue all fish stocks worldwide will collapse within 50 years,
- ❖ No genetically modified (GM) ingredients: these potentially pose a risk to human health and the environment. There are risks from the social and economic impact of the technology, particularly on smallholder farmers in developing countries
- ❖ It is seasonal: eating Scottish produce in-season is one of the best ways to reduce our carbon footprint, by cutting food miles and avoiding energy-intensive heated glasshouses. Currently, 90% of the fruit and 44% of the vegetables consumed in the UK are imported
- ❖ Use of sustainable palm or avoid using palm oil
- ❖ Less but better-quality meat is served. This is meat produced with high animal welfare standards and less environmental impact. Organic farming requires extensive, low-density grazing on pasture – with real benefits for the environment, climate change and animal welfare. This can involve meat free days or incorporating pulses and vegetables into recipes to replace some of the meat content to offset the costs of buying better quality meat.

Health

- ❖ Demonstrate compliance with the national regulations on school food and drink
- ❖ No undesirable additives or artificial trans fats are used
- ❖ Free drinking water is prominently available
- ❖ Caterers support schools with food education activities such as food tasting events for students and their families and/or carers
- ❖ Use of alternatives to salt for seasoning methods
- ❖ Information about eating well is on display
- ❖ All suppliers verified to ensure they comply with appropriate food safety standards
- ❖ Serving staff are knowledgeable about healthy choices and actively promote them



- ❖ Healthy-choice dishes and accompaniments are placed first option or prime position to encourage selection

Economic sustainability

- ❖ Champions Scottish food producers, through sourcing ingredients from Scotland
- ❖ Fairtrade certified products and ingredients are used
- ❖ Information about food provenance is on display

Governance:

The FFLSH standards are set and overseen by the independent Food for Life Served Here Committee. This is made up of a range of independent experts, who are appointed by open recruitment on the basis of their individual experience and knowledge. Changes to FFLSH standards always follow a public consultation, during which it is important that a range of views are heard. Consultations are publicised widely, including in e-newsletter and on our website.

From our experience, delivering good food as outlined above at cost is a commonly cited barrier to delivering sustainable diets through the public sector. However, the FFLS team are helping staff to deliver the above standards at cost. As a purchasing officer with North Ayrshire Council, who have achieved FFLSH Gold award explains, 'You can balance the costs. People say, "Oh, we can't afford it" but you can. Buying processed food is expensive. Cutting it out, using fresh food and having meat-free days helps us balance food spend. We started with the menu; we made sure it was nutritious and that we could afford it; and then that everyone liked it.' They have changed the way they source and cook their food, plan their menus and receive deliveries to create a better picture of the food system they support through their procurement. In addition, they have seen an increase in the uptake of school meals by 29% since 2013. In the primary 1-3 years, uptake of school meals is 85%, one of the highest in the UK.

A definition of good food, on its own, is not enough. Soil Association Scotland is asking for good food to be embedded within the public sector by providing a framework for Ministers and public authorities to prepare statements of policy on how they can recognise the vital role of food can play for meeting social, economic and environmental priorities and place duties on public bodies to consider 'good food' when:

- Carrying out their day-to-day work;
- Shaping policy;
- Delivering services; and
- In relation to their own employees

All too often the public sector doesn't consistently support a 'sustainable diets' approach. For example, the lack of good food affects the health and wellbeing of the public sector's own and related workforces. A study by researchers at Edinburgh Napier University analysed five years of data from 2008 to 2012, gathered as part of the Government's Scottish Health Survey. The study looked at 471 nurses, 433 other healthcare professionals, 813 care workers and 17,103 people with non-health-related occupations. It highlighted concerns about the unhealthy lifestyles of care workers (not necessarily employed by the public sector) with four out of five surveyed eating fewer than five portions a day of fruit and vegetables. 68% of NHS nurses in the sample did not eat the recommended fruit and vegetable intake. The study concludes that fruit and vegetables should be promoted in healthcare workplaces, over snacks high in calories, sugar and salt. A previous study identified that 70% of nurses were overweight or obese and that a lack of access to healthy food in the workplace, especially for those working night shifts, is one reason for unhealthy diets.

The public sector has the potential to be a beacon of good food, supporting the Good Food Nation ambition. Therefore, duties on the public sector must be 'owned' at a strategic level, rather than being siloed into departments as seems to have happened with the Procurement Reform (Scotland) Act 2014. Strategic ownership of these duties will ensure that opportunities to achieve Good Food Nation outcomes are not missed.

Question 2: Whilst we do not plan to require all sectors to prepare statements of policy on food, they do all have a role to play in achieving our Good Food Nation ambition. To what extent do you agree that Government should encourage and enable businesses in particular to play their part?

Strongly agree.

An example of how businesses are playing their part in delivering on good food nation ambitions in Scotland is through the Sustainable Food Cities (SFC) model. SFC is developed and supported as a partnership between Soil Association, Food Matters and Sustain. It is a place-based approach that involves developing a cross-sector partnership of local public agencies, communities, businesses, academics and NGOs committed to working together to make healthy and sustainable food a defining characteristic of where they live. The Sustainable Food Cities Network helps partners share challenges, explore practical solutions and develop best practice on key food issues. There are currently 5 places across the UK that are members of the SFC network. There should be greater support for this form of partnership working through the Good Food Nation legislation. We discuss this in more detail in our response to question 3.

In addition, the public procurement of sustainable food is one of the most effective mechanisms for transforming food production and supply by widening public access to healthier, higher animal welfare, local and organic food, whilst building stable markets for farmers and other food businesses.

Soil Association Scotland are already working to transform food procurement of school meals. Through our Scottish Government funded Food for Life Scotland (FFLS) programme we are supporting local authorities to get more local food on the table and serve fresh, healthy and sustainable meals in their schools. Through our work with caterers and facilities teams in local authorities across Scotland we have identified the following actions as crucial for transforming public sector procurement, enabling businesses to play their part in achieving the Good Food Nation ambitions.

- Clear targets on the procurement of 'good food' by public sector bodies to support the delivery of the duties set out the Procurement Reform (Scotland) Act 2014
- 15% organic produce procurement target for public sector kitchens
- Routine data collection on public sector procurement, including economic, health and social and environmental impacts of public sector procurement, to build understanding of the impact of public spend on good food and highlight opportunities for further development
- Support for supply chain development to overcome challenges of getting more local food on the table
- Support local authorities to protect and invest in public sector food infrastructure
- Support local authorities to empower and invest in caterers

To effectively transform public sector procurement, there needs to be commitment at the most senior levels so that there is adequate staff training, infrastructure (e.g. kitchen facilities and dining room space) and budget for ingredients, so that local food can make it onto the public plate. Through the Food for Life programme we are building relationships with local authority elected members, chief executives, facilities teams and caterers to help them understand the benefits of schools serving good food.

It is important to work with caterers; the unsung heroes of children's nutrition. To effectively transform procurement, we need to get them on board and empower them. The FFLS team works directly with caterers to help with menu planning and training key catering staff. We help caterers find ways to include seasonal and local produce in their meals, and to make sure that children and young people are involved and knowledgeable too.

For example, Soil Association Scotland ran a training session for 22 school catering staff from across Inverclyde so they could learn about seasonal Scottish fruit and vegetables within the context of the FFLSH award for primary school meals. After an introduction to the principles of 'good food', we encouraged catering staff to explore a veg box provided by local suppliers. Caterers then prepared dishes using the vegetables. As staff cooked and ate together, we discussed how to incorporate seasonal ingredients into school menus. They shared tips – like including seasonal vegetables in cakes and muffins – and discussed how they could spread the message about good food in their respective schools. One caterer explained why she enjoyed the session: 'It gave us more of an understanding of why we are going for this (FFLSH) award and all the benefits that will be achieved. The practical side of it was good too, and the food that was prepared by everyone was delicious. It's good to see our school meals heading in this direction, with more wholesome foods making it healthier for the children.'

These types of activities are crucial as staff need the skills and the facilities to process and prepare local food. Lack of these is a common barrier to serving locally sourced food in the public sector.

Through FFLS we are also undertaking national and local supply chain work, including supporting supply chain pilots and supply chain research to understanding the barriers and opportunities for sourcing good food. This work needs to be supported and enabled across the public sector and beyond.

There is also a need to recognise the role of agriculture policy in delivering the Good Food Nation ambition. Sustainable diets and sustainable farming are two sides of the same coin. To enable the wide spread adoption of sustainable diets we need food to be produced by sustainable methods to become the norm. On the other hand, patterns of consumption also need to shift towards more sustainable diets to increase demand for more sustainable forms of production.

Future agricultural policy and payments should pursue a strong vision for the sector. This vision should be to make sustainable farming the easy choice for land managers.

By sustainable farming we mean farming that is good for:

- ❖ Scotland's environment: increasing biodiversity and supporting healthy ecosystem services, such as clean water, fertile soil and pollination
- ❖ Scotland's rural economy: building thriving, resilient businesses that contribute to strong rural economies
- ❖ Scotland's place in the world: transitioning towards zero carbon farming, promoting Scotland as world leader on climate change

To achieve sustainable farming, we need an agricultural payments system that supports and enables:

- ❖ The transition towards zero carbon farming: promoting and embedding practices that reduce the GHG emissions associated with food production. These include agroforestry, peatland restoration and a nitrogen balance sheet for Scotland
- ❖ Farming with nature: by maximising ecosystem services and restoring biodiversity through the widespread adoption of agroecological and organic systems
- ❖ Thriving and resilient rural businesses: through supporting farmer-led innovation, investing in soils and ensuring a good life for all farm animals

Soil Association Scotland is advocating for practices that reduce emissions of GHGs and increase carbon sequestration. Outcomes that do not increase profitability, yet provide public benefit should be compensated by environmental outcome payments. Win-wins should be promoted, and land

managers should be enabled to carry out these practices, through information, training and support. In this way agricultural policy could play its crucial role in delivering the good food nation ambition.

Question 3: Approach to accountability of ministers and specified public authorities through policy statement and regular reporting

Agree but more detail needed.

Good Food Nation legislation should include process mechanisms to ensure that public bodies are meeting their duties to deliver good food could include:

- Good food impact assessments of all policies and practices
- Good food organisational and implementation plans
- Reporting to government, parliament or an independent body
- Involving relevant stakeholders in decision making

One way of bringing all of this together this through the Sustainable Food Cities (SFC) model. The SFC partnerships develop a strategy and action plan around how different actors can help address the key issues in the food system that the local area faces, including how to measure progress. The key issues that places are encouraged to address are:

1. Promoting healthy and sustainable food to the public
2. Tackling food poverty, diet-related ill health and access to affordable healthy food
3. Building community food knowledge, skills, resources and projects
4. Promoting a vibrant and diverse sustainable food economy
5. Transforming catering and food procurement
6. Reducing waste and the ecological footprint of the food system

An important role of these cross-sector partnership is to raise good food up the agenda where they live, by influencing local policy and strategies, ensuring that opportunities to embed and deliver good food and address the issues in the food system are not missed.

Several places in Scotland have already formed such food partnerships including Edinburgh, Glasgow, Aberdeen, Stirling and North Ayrshire. This model could form the basis of how progress towards the Good Food Nation ambition can be monitored and also sets out an inclusive governance structure around the food system in local areas; in keeping with the principles of the Community Empowerment (Scotland) Act 2015 and the governance element of sustainable diets.

Scottish Government support for data collection on public procurement

The importance of routine data collection and reporting around the procurement of good food cannot be underestimated. It is necessary to build a picture of the economic, health and social and environmental impacts of public sector procurement, and so develop an understanding of the impact of public spend on good food and highlight opportunities for further development.

Under the Food for Life programme, Soil Association Scotland organises and analyses food-spend data to build an in-depth evidence-based profile of a local authority's school meal service. This can:

- ❖ Provide clarity on spend patterns
- ❖ Enable data-driven decision-making
- ❖ Find potential cost savings
- ❖ Identify challenges and help us make recommendations
- ❖ Provide demonstratable facts and figures to celebrate success

Analysis of data allows local authorities to:

- ❖ Focus on tracking and increasing Scottish spend, including what produce is available in and around the local authorities
- ❖ Support menu development and conversion
- ❖ Identify maverick spend and develop tools and methods to minimise it
- ❖ Compare cost of alternative products, track progress, find cost efficiencies and achieve FFLSH on budget

Question 4: To what extent do you agree with the proposal for targeted legislation relevant to specific policy areas as an alternative to a single piece of legislation?

Neutral

It is possible to take a more holistic approach to food, but this is not the norm across the public sector. There is no policy or legislative framework to deliver sustainable diets, and thus embed good food at scale across Scotland. There are many examples of good practice, but this is often down to individuals who are committed to promoting an ethos and practice of 'good food'. This makes their service vulnerable to austerity cuts, staff cuts, and changes in political leadership. More can and should be done. This is where Good Food Nation legislation can play a key role.

We don't have the legal expertise to advise Scottish Government on legislation required to take forward the good food nation ambition. We need action and accountability and whatever legal instruments are required to ensure the Good Food Nation ambition becomes a reality.

As stated in the previous questions, Soil Association Scotland believes that any legislation needs to ensure the following:

- ❖ An agreed definition of good food that is underpinned by the sustainable diets approach
- ❖ Duties on public bodies, owned at strategic level, to consider 'good food' when:
 - Carrying out their day-to-day work
 - Shaping policy
 - Delivering services and
 - In relation to their own employees
- ❖ Clear targets on the procurement of 'good food' by public sector bodies to support the delivery of the duties set out the Procurement Reform (Scotland) Act 2014
- ❖ 15% organic produce procurement target for public sector kitchens
- ❖ Routine data collection on public sector procurement, including economic, health and social and environmental impacts of public sector procurement, to build understanding of the impact of public spend on good food and highlight opportunities for further development
- ❖ Support for supply chain development to overcome challenges of getting more local food on the table
- ❖ Support local authorities to protect and invest in public sector food infrastructure
- ❖ Support local authorities to empower and invest in caterers
- ❖ Good food impact assessments of all policies and practices
- ❖ Good food organisational and implementation plans
- ❖ Reporting to government, parliament or an independent body
- ❖ Involvement of relevant stakeholders in decision making

There is an opportunity to learn from other European countries that have created legal frameworks aimed at delivering sustainable diets at scale, either through Bills or secondary legislation such as dietary Guidelines.

France

The French Government adopted a 'Food Law' in 2018, following a public consultation on food systems (États Généraux de l'Alimentation). The law establishes comprehensive objectives for achieving sustainable food systems, including ambitious targets for providing organic food in public canteens, reducing plastic use, stronger legislation on animal welfare, and separating pesticide sales from farm advisory services.

Sweden

In 2016 the Swedish Government passed a Bill setting out a national food strategy to underpin the country's efforts to meet the sustainable development goals. The food strategy aims to develop a competitive and sustainable food supply chain by 2030, including safeguarding access to local and regional plant varieties, improving access to productive land and water resources, and increasing national organic food production and procurement.

Sweden has also developed dietary guidelines that promote environmentally sustainable diets and eating patterns that ensure food security, improve diet quality, human health and wellbeing, social equity, and respond to climate change challenges.

Denmark

Across Denmark generally, Public Organic Procurement Policies (POPPs) have been used as a policy model since 2000s. They were included in the Organic Action Plan 2020, published in 2012. The plan aims to increase organic food procurement to 60% in all public kitchens before 2020 (in accordance with EU initiatives). The organic action plan targets various age groups through different types of public kitchens.

The policy is considered a success and it is anticipated that Denmark will achieve its 60% target by 2020:

- Denmark is the second largest global consumer of organic food per capita
- Organic retail sales in Denmark increased significantly between 2016 and 2017. Organic food now makes up over 13% of all retail food products

Success is attributed to the political decision to support organic through public procurement, and strong financing from government during the conversion period. Innovative methods of training and teaching of all stakeholders and a special focus on staff in public kitchens have also been vital.

Outcomes across Denmark include:

- Growth in sales of organic produce. Total sales of organic food and beverages for the food service sector increased by 33% between 2013 and 2014. Public sector kitchens account for 40% of this market share. Growth in public sector organic spend is in line with private sector growth. Organic food production and purchasing have become normalised
- Domestic and export markets for Danish organic produce continue to grow
- Kitchens going through organic conversion demonstrate a strong will to collaborate with local suppliers. One of the most significant challenges of organic conversion is the limited supply of organic produce and unstable deliveries. Denmark has found ways around this by adapting menu plans and recipes according to availability of produce, and upskilling the workforce
- Workforce benefits: kitchen staff report higher levels of skills, morale and increased job satisfaction
- Public health: the impact of organic food conversion on public nutrition remains unclear. However, there are positive associations between implementing organic food production and more nutritious diet compositions. During conversion, menu plans tend to increase



consumption of fruit and vegetables to maintain current food costs. Organic conversion creates a better environment for healthy eating

We recommend that the Scottish Government examine these international examples as it explores ways to deliver legislation with the ability to bring the food system transformation needed for Scotland to become a world leader in Good Food.

All references used for this consultation response are available on request.