CONSULTATION QUESTIONS

1. How important do you think it is that we aim to be a Good Food Nation?

Comments

2. How would we know when we had got there? What would success look like?

Comments

3. Do you agree with the proposed vision? How would you improve it?

Comments

4. How would your life be better? What does being a Good Food Nation mean in your locality?

Comments

5. Are there any other essential steps we need to take before setting out on this journey?

Comments

6. How do you think a Food Commission could best help?

Comments

7. In what areas should indicators be set to check we are on track towards our goals?

Comments

8. What are your views on the different approaches that could be taken to help us become a Good Food Nation?

Comments
9. Do you agree with the proposed initial focus on:
   - Food in the public sector
   - A children’s food policy
   - Local food
   - Good food choices and
   - Continued economic growth?

Comments

10. Which other areas would you prioritise?

Comments

11. What other steps toward achieving a Good Food Nation would you recommend?

Comments

12. What else should be considered?

Comments

13. What steps do you plan to take to help Scotland on the journey toward becoming a Good Food Nation – in the next month and in the next 12 months?

Comments

14. How did you hear about this Discussion Document?

Comments

Responding to this Consultation Paper

We are inviting written responses to this consultation paper by 17th October 2014. Please send your response with the completed Respondent Information Form (see "Handling your Response" below) to:

goodfoodnation@scotland.gsi.gov.uk

Or by post to:
Good Food Nation
Food and Drink Division
B1 Spur
Saughton House
Edinburgh
**Good Food Nation**

Glasgow City Council welcomes the opportunity to comment on this important area. The Council has a strong record of engagement in food policy issues and is currently working with local partners to develop a Sustainable Food City model for Glasgow. Comments were also previously submitted on the Scottish Government’s draft National Food and Drink Policy.

In summary, the Council’s response to this consultation is:

- Broadly supportive of the ambitions and direction of travel set out.
- In line with current policy developments in the city which relate to sustainability and health.
- Clear that the need to tackle inequalities across Scotland’s communities should be at the heart of any such policy.
- Focussed on achieving a sustainable balance between economic growth and environmental impacts.

The Council has engaged across its services and arms length companies to inform its responses to the set questions noted below.

1. **How important do you think it is that we aim to be a Good Food Nation?**

1.1 Scotland has a set of broad national ambitions on health, climate change and sustainability. In order to meet these objectives it will need to identify and address all the key contributory factors to success, with food being one of the principal factors.

1.2 Sustainable development is an overarching ambition for Scotland, but it has not always been easy to deliver a true balance of social, economic and environmental factors that can lead to real long-term sustainability. Food issues relate to all of these factors and therefore present major opportunities for giving practical application to the national and local sustainability agenda.

1.3 The comments which follow are based especially on an acknowledgement that effort needs to be put into ensuring that economic growth and sustainability are compatible. On this basis, it is understood that economic development therefore has a key role to play in addressing health, social and environmental impacts which are linked to food. It would be further accepted that if sustainable growth in jobs and businesses can provide the finances to support healthier eating and an environment in which people can flourish.

1.4 With this in mind, the Council sees the potential for food issues to act as a more manageable proxy for the broader sustainability agenda – particularly given that there are opportunities to deliver tangible results by 2025 on the economic and environmental factors associated with the food
sector. Realisation of social and health benefits may require a longer period for improvements to be observed. This ambition appears to be a practical objective as most of the factors to allow progress are within Scotland’s control and a Good Food Nation could be the vehicle to drive or deliver on this ambition.

1.5 As noted in the foreword, “Scotland continues to have an uneasy relationship with food. We have one of the poorest diet-related health records globally”. As the largest city in Scotland, Glasgow unfortunately adds significantly to these negative health statistics. Indeed, the city makes a disproportionate contribution to the national burden of ill health and premature mortality in virtue of the health inequalities experienced across its communities.

1.6 The role of economic development and the environment in improving health is commended and supported. It would also be greatly welcomed if a Good Food Nation could have as its prime focus a continuing aim to promote initiatives that improve health and well being as well as one to initiate new plans, perhaps replicated from other nations, that seek to improve our national health record where it interfaces with diet.

1.7 The definition of a Good Food Nation is “where it is second nature to serve, sell and eat fresh, healthy food”. The key role for the new Scottish Food Commission is stated as being to “advocate the importance of food and drink to Scotland’s health, environment, economy and quality of life”. These objectives can also be called a “sustainable food” approach. This issue is currently being addressed by the Sustainable Food Cities (SFC) initiative, which is led by the Soil Association. There are over 30 UK cities currently participating in the SFC network as they have already recognised the importance of sustainability in all aspects of food – from “seed to plate” or “soil to soil”.

1.8 The Scottish Government’s objectives in “Becoming a Good Food Nation” are very similar to the objectives of the Sustainable Food Cities initiative, to which Glasgow City Council is already committed to progressing. This support will be shown by the Council’s participation in the city-wide Glasgow Food Policy Partnership and internally by awareness raising of the broad and varied role of food in a wide range of activities. It will also involve instituting an internal mechanism to discuss and co-ordinate these roles.

1.9 Finally, it is also important to recognise that, whilst all of the Government’s objectives for a Good Food Nation should be supported and addressed, there are some that could be addressed more directly than others. This particularly includes the poor health statistics for Glaswegians, which mean that tackling the health issues related to diet and which could be improved by diet are vital from a Glasgow perspective.
2. How would we know when we had got there? What would success look like?

2.1 As noted previously, the Council sees the Good Food Nation objectives as compatible with the sustainable food objectives that Glasgow is currently pursuing. In this context, it is clear that the city is on a journey towards sustainability and will constantly be reaching towards further improvements.

2.2 However, bearing this in mind, there should be indicators that show Scotland is heading in a sustainable direction. The key indicators of success would, therefore, be likely to include:

- Better access to fresh, affordable and healthy food choices for local communities across Scotland, particularly in areas of high deprivation.

- Improvements in key indicators of health in all areas of Scotland – such as obesity and attainment of the 5-a-day recommendation - but particularly in areas of high deprivation.

- Increased turnover/profits/employment for local businesses working in the food sector.

- Scotland's cities are all identified as Sustainable Food Cities, with strong leadership from local authorities.

3. Do you agree with the proposed vision? How would you improve it?

3.1 There is a perception, rightly or wrongly, that whilst Scottish produce can be high quality, fresh, healthy and environmentally sound, this comes at a cost – a cost that many Glaswegians cannot afford to pay. This barrier should be recognised, highlighted and addressed either by informing of the reasons for the “higher cost” or to work towards disproving this myth.

3.2 With these issues in mind, the vision could be more explicit on how it is intended to ensure that quality foods can be accessed by individuals from all economic backgrounds.

3.3 Furthermore, the vision does not recognise that many Scots are currently living in a state of food poverty and are dependent on food banks to feed themselves or their families. The vision should, therefore, explicitly state that “by 2025 all Scots will be able to afford a healthy diet and will not rely on food banks or donated food”.

3.4 It would also be useful for the vision to provide a steer on the issue of land use, particularly for local food production/ allotments.
4. How would your life be better? What does being a Good Food Nation mean in your locality?

4.1 In Glasgow, the positive health impacts of eating healthy, fresh and high quality food are clear. Delivering health improvements for Glaswegians through an improved diet and a better understanding of sustainable food issues is vitally important. Such improvements would impact on many aspects of life in Glasgow – in health, on the environment and in economic opportunities. Of equal, and related, importance to Glasgow and Glaswegians, a Good Food Nation would mean that its citizens were not dependent on food banks, as previously stated.

4.2 Encouragement and support for a truly local food culture, whether “local” means - in Glasgow, the West of Scotland or nationally - could benefit Glasgow food producers, wholesalers and retailers and could create a sustainable food city “buzz” that would encourage both job growth and tourism growth.

5. Are there any other steps we need to take before setting out on this journey?

5.1 The “Consensus on how to get there” (page 20) section of the discussion document refers to previous attempts to “improve Scotland’s relationship with food”, but also notes that these attempts “arguably stumbled because of the approach adopted”.

5.2 In this light, it would be beneficial to present a summary of the successes and failures that resulted from these attempts in order to ensure that all stakeholders understand the background and can try to prevent the same mistakes being made again. A more comprehensive assessment of previous work and a sense of history could assist in taking matters forward in a more effective way.

5.3 Becoming a Good Food Nation states that “everyone needs to be involved”. Whilst it is necessary that all Scots need to contribute in some way for progress to be made by 2025, it should also be noted that some sectors and their representative bodies will have key roles to play. The discussion document, at various points, refers to sectors and a variety of bodies that would be involved in ensuring Scotland moves towards “Becoming a Good Food Nation”. That this information is scattered throughout the document is only partially helpful. It would be of greater assistance if the Scottish Government was able to present a more comprehensive picture of Scotland’s sustainable food landscape.

5.4 This landscape should show the linkages between the social, economic and environmental sectors and the food sector and which organisations could be expected to have a contribution or viewpoint. These are likely to include trade bodies, academic research institutions, public health organisations, land use representatives or community
growing groups, to name but a few. The preparation and publication of such a comprehensive information database would allow the Government and the nation to develop the sustainable food agenda with the full confidence that all relevant sectors of Scottish society had had their role recognised as important and that they had been given an opportunity to contribute to the development of the next stages.

6. How do you think a Food Commission could best help?

6.1 A Scottish Food Commission should focus on ensuring a sustainable direction of travel for all the Good Food Nation objectives. This would mean aiming for an appropriate balance between the broad economic, social and environmental aspects of food. It would seek, for instance, to ensure that the economic agenda or focus does not take precedence over our environment, or vice versa.

6.2 This objective could be best met by ensuring that the advisers appointed to the Scottish Food Commission come from an appropriate range of backgrounds. If the Scottish Government uses the three sustainability principles – economic, social and environmental – as its basis for membership then the final membership of the commission (“15 or so members”) should be capable of trisection into these principles. This should result in 5 members or so representing each of the three principles and thus encouraging a sustainable way forward.

6.3 In line with this balanced approach, it would also be appropriate that any resources (such as budgets) that are allocated to the Commission, or any aims and objectives that it sets for Scotland's food journey, should also endeavour to follow a sustainable approach.

6.4 An initial action that the Scottish Food Commission could support would be the provision, or commission of, definitions of the terms and concepts that are used in the discussion document (e.g. what is local food, or what is a good food choice?). The answers to these questions will differ between individuals and organisations and it may be necessary to have a clearer idea of what they mean to allow for co-ordinated action or measurement of success.

6.5 Also, as noted in response to question 6, a “mapping” exercise should be carried out of Scotland’s food landscape to highlight the variety of potential interested parties and the multiplicity of issues that would fit within the broad sustainable food theme. This could be led by the Scottish Food Commission. Furthermore, if the Commission has an appropriately balanced membership then there would be a greater likelihood of this mapping being comprehensive.

7. In what areas should indicators be set to check we are on track towards our goals?
7.1 In line with previous responses above, any indicators that are used to measure progress towards meeting national and local goals should cover the three sustainability principles and should also be appropriately balanced. The discussion document appears to suggest that the “two high profile existing targets of turnover and exports” will take precedence. These would need to be suitably developed within an overall sustainability framework if they were to deliver a Good (or Sustainable) Food Nation.

7.2 However, as also previously noted, Glasgow has a very poor health record and the absence of fresh, healthy food from many diets is a strong contributory factor for this avoidable position. Whilst this has a disproportionate impact in Glasgow it will also be replicated in other parts of Scotland. Therefore, the use of health indicators should be an essential part of any indicator set.

7.3 Existing health indicators should be used as much as possible, or co-opted, for the purpose of assessing the health improvements arising from an improved national diet or food culture. The obvious benefit of using the existing measures is that any improvements will be easily recognised. Scotland can draw upon a strong track record in collating and assessing public health data in this respect.

7.4 Finally, it will not be possible for all indicators to be objective as some issues will only be suitable for subjective measurement. How such matters can be assessed could be taken forward by the Scottish Food Commission. This issue links with previous comments on the requirement for definitions of terms used in the discussion document – for instance, “good food choices” can vary between individuals and thus any measurements would be subjective.

8. **What are your views on the different approaches that could be taken to help us become a Good Food Nation?**

8.1 The discussion document does not appear to outline many different approaches to improving “Scotland's relationship with food" beyond:

- Celebrating the positive aspects.
- Education on food.
- Countering perceptions that caring about food is only for those who can afford it.

Whilst these approaches are all relevant and would receive widespread support, there is likely to be scope for outlining additional approaches.

8.2 It is also noted that “this is not the first attempt to improve Scotland's relationship with food. Previous efforts have made progress but have, on occasion, arguably stumbled because of the approach adopted”. To provide clarity and to ensure an effective approach is used in the future it
would be very helpful if the progress and the “stumbles” were outlined in a lessons learned approach.

9. Do you agree with the proposed initial focus on:
   - Food in the public sector
   - A children’s food policy
   - Local Food
   - Good Food choices and
   - Continued economic growth

9.1 Although all five of the proposed areas of focus are recognised as important themes for the initial stages of “Becoming a Good Food Nation”, the Council would make the following comments on each.

9.2 Food in the public sector – it is understandable that there is an expectation that the “public sector leads by example”. However, in order for this focus to succeed, there needs to be clarity on:

   - What will provide “best” or “public” value?
   - What is permissible via existing budgets and legislation?
   - What support or advice will be provided by national government on how the four ambitions for public sector food (page 21) can be met within existing resources and budgets?

The discussion document appears to have an expectation that local authorities will be amongst the key stakeholders to deliver on public sector food ambitions and that a key part of this will result from sustainable purchasing supported by the Procurement Reform (Scotland) Bill. However, there is still a lot of uncertainty on whether the Bill will actually deliver the means to allow the public sector to support the ambitions laid out in the discussion document.

There does appear to be recognition of the issues and complexities around the procurement process and also on the food safety and quality safeguards, but little in the way of solutions. It would be helpful if there was more clarity around these issues before “setting out on the journey”. This would seem to be another issue that could be investigated by the Scottish Food Commission.

9.3 A children’s food policy – the Scottish Government is correct to recognise the “strong case for focusing much of our attention on Scotland’s children, from pre-school onwards”. Education Services within Glasgow City Council is already developing “A food policy for Glasgow schools” as it has recognised the potential benefits arising from such an approach.

An unfortunate implication of this focus is the appearance that rest of the Scottish population is not being considered. Great care will need to be taken when presenting this objective to avoid giving this impression.
It is also worth noting that, although the schools can fully support this objective to the best of their resources, their pupils still have to spend the majority of their time out of school and in parental care. The discussion document does not make it clear how it intends to support adults and parents to reinforce the good food choices outlined by schools.

9.4 Local Food – as noted previously, it would be beneficial if the Scottish Government, or the forthcoming Scottish Food Commission, could provide a clearer definition of what local food is to ensure that all areas of Scotland are working with a similar understanding. This focus notes the key role for locally grown food and the links to issues addressed by the provisions with the Community Empowerment (Scotland) Bill. This is appropriate as this should help maintain the momentum around allotments and local food growing. In addition, however, there is the possibility to consider co-operative business models and how they can interface with the local food agenda. Social enterprise models already have strong connections to the local food movement and could be further supported or enhanced under this focus. It should be noted that Glasgow itself is committed to becoming a Co-operative Council.

9.5 Good Food choices – the discussion document recognises “that poor diet can often be as much about a lack of empowerment to make choices as about a lack of available (and affordable) choices” and proposes that the Scottish Food Commission should provide advice on how to support this focus. An important first step for the Commission will be to follow up, as proposed, on “simplifying the key messages and the range of delivery mechanisms; reducing radically the current plethora of definitions of what constitutes sustainable food”. There may even need to be discussion on whether a definition of “good food” is required - as it may not exactly align with “sustainable food”.

9.6 Continued economic growth – this should continue to be recognised as vitally important, but must be delivered within a true sustainability context so that it is equally balanced with environmental and social/health priorities.

10. Which other areas would you prioritise?

10.1 Too many of Scotland’s citizens currently cannot afford healthy food and are faced with harsh daily budgetary decisions on whether to feed their families or heat their homes. The discussion document should refer to these dilemmas much more clearly. Whilst food banks and charities should be praised for trying to tackle these issues, Scotland in 2025 should not have anyone living in food poverty and dependent on them. Food poverty should be considered as an issue in itself or highlighted more substantially within an existing focus.
10.2 The consultation document also notes that “as a nation, we waste one fifth of the food we buy each year – most of which could have been avoided. It’s expensive and it’s bad for our environment; 630,000 tonnes of food and drink is thrown away annually – costing Scots over £1 billion and creating harmful greenhouse gases.” Food waste and its use could therefore be another issue that merits a greater focus.

10.3 The two points referred to above appear to indicate that there is more room for joining up policy priorities through Scotland’s food system. The Scottish Food Commission could perhaps encourage innovative thinking in this respect and put forward proposals that address issues such as those noted above.

11. What other steps towards achieving a Good Food Nation would you recommend?

11.1 The discussion document refers to “food, in all its stages, as estimated to account worldwide for 31% of greenhouse gas emissions”. The Climate Change (Scotland) Act has set national targets for Scottish greenhouse gas emissions. It should, therefore, be expected that the role of food within Scottish greenhouse gas emissions should also be addressed by a “Good Food Nation”.

11.2 The Scottish Government, or the proposed Scottish Food Commission, could develop research that analyses the greenhouse gas impacts of various “food policy” options or foci to ensure that Scotland was also “world leading” in addressing food’s role in climate change.

12. What else should be considered? No comment.

13. What steps do you plan to take to help Scotland on the journey toward becoming a Good Food Nation – in the next month and in the next 12 months?

13.1 As over 10% of Scotland's population reside in Glasgow any steps which the city takes on this journey will have a major impact on Scotland's ambitions. In fact, due to levels of deprivation in the city and the health record of many Glaswegians, it can be argued that any improvements in Glasgow will have a disproportionate impact on national ambitions.

13.2 Glasgow City Council, therefore, intends to address issues similar to those highlighted in the “Good Food Nation” discussion document in conjunction with its partners in the aforementioned Glasgow Food Policy Partnership (GFPP). This will include participation in the Soil Association Sustainable Food Cities network, which also aims to respond to similar issues.
13.3 This partnership process and the likely GFPP objectives can be regarded as a local iteration of the national proposals. In addition to the general objective noted above and to ensure effective support to the Glasgow Food Policy Partnership, Glasgow City Council will:

- Establish an internal sustainable food city advisory group with service representatives in order to maximise the Council’s participation in the new partnership and to take forward specific actions as local authority.

- Prepare a baseline audit of the sustainable food issues that currently impact on Council services and its arms length organisations.

This citywide process will not only support the national food objectives but will be able to highlight, and look to encourage action, on specific local issues.