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
Advice Paper 14-11
October 2014

Becoming a Good Food Nation: a response to the Scottish Government's discussion document on a new national food and drink policy.

Key points

- The Royal Society of Edinburgh (RSE) welcomes the broad vision of a Good Food Scotland but suggests that a degree of realism is needed both on the timescales required to make progress and on the potential conflicts that may arise between different elements of the vision, such as growth of the food and drink sector, and improved diets.

- An international perspective on practice and experiences across Europe and beyond, in tackling unhealthy diets and encouraging economic growth of the food sector, would allow Scotland to develop well-informed, evidence-based initiatives from the outset.

- The establishment of a Food Commission could be a useful mechanism through which to drive progress towards a Good Food Nation. However, there must be clear articulation of how this body would link with the numerous government departments and other public and private bodies that already have a role in achieving the goals of the vision.

- In particular, the RSE is concerned about the broad allusion to the Food Commission having some responsibility for setting research priorities. The current integration of research into food, land use, production and sustainability issues within RESAS¹ is crucial to providing evidence for increasingly complex challenges.

- Each of the proposed priorities is an important issue, and the RSE particularly welcomes the commitment to leadership and example setting across the public sector. In every case, it is crucial that all partners, from families and communities to retailers, suppliers and producers, are active shapers and participants of efforts to achieve the vision of a Good Food Nation.

Introduction

1. The Royal Society of Edinburgh welcomes this opportunity to feed in to the development of Scotland’s next national food and drink policy; a policy that will have important implications for the future health and wellbeing of Scottish society and the economy. This response has been prepared by a specially-convened group of RSE Fellows and RSE Young Academy of Scotland.

¹ RESAS: The Rural Environment Science and Analytical Services division of the Scottish Government.
members whose expertise spans health, nutrition, land use, sustainability, research, international markets, retail and public policy. The RSE is therefore well-placed to provide a comprehensive view of the issues considered in the Good Food Nation discussion document.

**Responses to consultation questions**

**Q1. How important is it that we aim to be a Good Food Nation?**

2. The RSE agrees that the outcomes envisaged for a Good Food Scotland are of key importance to the country, whether they are the improved health of society, the strengthening of a sector that is already a vital part of Scotland’s economy, or enhanced food security based on more sustainable production processes.

3. It would, however, be useful to have more clarity on what is meant by the term ‘Good Food Nation’. While the discussion document notes that there is as yet no agreement on the concept, the Scottish Government should offer its definition for the purposes of the policy, clarifying the key principles that will guide the policy and its initiatives. This may require only a brief statement, e.g. “A nation in which food of high quality in terms of taste, safety and especially nutritional value (leading to optimal health, including appropriate body weight) is consumed across all sections of society, the food being produced and sourced locally (wherever practical) with the minimum possible environmental impact, while enhancing regional economic structures”.

**Q2. How would we know when we had got there? What would success look like?**

4. The journey to becoming a Good Food Nation is one with no defined end-point: it is unlikely that Scotland (or any other nation) will reach a state in which public health (related to diet) is optimal, where the food and drink sector cannot be further developed nor sustainability improved. However, there will be features across the range of domains affected by food and drink policy that would be indicative of a Good Food Nation. Specific indicators are discussed further under Q7 (paragraph 17).

5. A Good Food Nation would be characterised by the pervasive availability of high quality, nutritious, safe, sustainably-produced and tasty food in all outlets, and be available within all communities. Consumers would have a well-rounded understanding of what constitutes a ‘good food choice’ and the education system would equip young people with practical food skills, an understanding of the health implications of a good diet and wider issues of food production and sustainability. Improved options and choices would lead to a reversal of the trends in Scotland of rising obesity and other dietary-related illnesses (including type 2 diabetes and some cancers).

6. Improving sustainability and food security would see food and drink producers in Scotland reducing the carbon intensity of their production processes and acquiring inputs from sustainable sources. Consumers would have an improved understanding of sustainable production and make choices accordingly (for example, improved recognition of sustainable source marks). Strengthening the food and drink sector in Scotland would involve growth and diversification of export markets; employment growth within the sector, increasing the share of Scottish food and drink as a percentage of the domestic market; growing food tourism; and structuring the sector to enhance both regional and local economies.
Q3. Do you agree with the proposed vision? How would you improve it?

7. The vision proposed in the document and the outcomes it suggests are laudable goals that policy-makers and partners have long been trying to achieve.

8. We do not, however, consider the vision achievable within the timescale set out in the document (a ten year period to 2025). Food choices and dietary habits are entrenched in wider societal culture and behaviours that will require long-term, sustained and multi-level efforts to change. Established methods of food production will be difficult to adapt for sustainability reasons, particularly where this would require upfront costs and in a system that does not yet take account of the full value of natural resources in the widest sense. The vision undoubtedly requires a long-term commitment.

9. The examples above also highlight another key concern that is not addressed within the document. There are elements of the vision that may be difficult to reconcile, such as the proposed growth of the food and drink sector and the need for a healthier diet at affordable prices. If improved diets and the reversal of rising obesity trends are goals of the policy, then it must explicitly recognise the need for people in Scotland to reduce levels of consumption of certain high calorie foods, and that this may have consequences for some producers, whether through reduced sales, required reformulation of products or the use of levers such as taxes on sugars. Each of the outcomes envisaged for a Good Food Nation Scotland is important but recognition of potential conflicts between the outcomes is necessary.

Q5. Are there any other essential steps we need to take before setting out on this journey?

10. The implementation of Scotland’s food and drink policy must be well-informed by an understanding of the drivers of food choices and related behaviours. This will require access to and appropriate use of a solid research base, but it would also benefit from a UK-wide as well as an international perspective. Benchmarking against both good and bad practice in other nations and regions would put Scotland in a strong position to develop well-informed initiatives and approaches from the outset. There will be lessons to be learned from elsewhere in the UK and Europe, but, equally, international perspectives from further afield, where food cultures and behaviours are substantially different to the European experience, may prove illuminating.

11. The ‘Good Food Nation’ document recognises that a partnership approach is vital to the success of the policy. We emphasise the necessity of such an approach and call for clarity on the partners involved, the role of each, and the efforts of the Scottish Government and/or Food Commission to bring them on-board from the earliest possible stage. For example, consumer access to ‘good food’ is a mass market issue as retail and wholesale sectors control many of the choices and the quality of options available; while reducing the calorie density of common manufactured/pre-prepared foodstuffs can only be done by manufacturers. The strategy requires the commitment and active engagement of all in the food chain. Further, there is a wide range of bodies that shape behaviours, either through their influence or through the levers they hold (for example SEPA’s control over landfill taxes for supermarkets that has implications for high levels of food waste); this must be fully considered before the policy is implemented.
Q6. How do you think a Food Commission can best help?

12. A Food Commission for Scotland, with a clear purpose and position within the policy landscape, could be an effective body for ensuring that approaches taken to achieve the Good Food Nation vision are based on the best available evidence and for driving collaborative change. However, we have a number of concerns with the proposals set out in the discussion document.

13. First, there is a need to articulate how the Food Commission will sit with other public bodies and umbrella organisations with responsibilities that fall within the remit of the food and drink policy. This includes clarity on to whom the Food Commission would be accountable. While noting that this policy is led by the Cabinet Secretary for Rural Affairs, Food and the Environment, the proposed remit of the Commission (to “advocate for the importance of food to Scotland’s health, environment, economy and quality of life”) clearly illustrates cross-over with portfolios both within central government and of other public bodies (e.g. NHS Scotland, VisitScotland, Scottish Enterprise). The linkages between these bodies should be made clear from the outset.

14. In particular, we are concerned that the new body proposed under the Food Standards (Scotland) Bill, currently being scrutinised by MSPs, is referred to in the discussion document only in terms of its remit for ensuring food safety. Food Standards Scotland was proposed in large part in response to the UK Government removing responsibility for nutrition from the remit of the Food Standards Agency. The current Bill foresees a substantial role for the new body in promoting a healthy diet in Scotland and to limit the role of Food Standards Scotland to the issue of food safety would be a retrograde step. There must be a clear understanding of both the responsibilities of and links between Food Standards Scotland and the Food Commission.

15. Second, we have substantial concerns about what is meant by the Food Commission’s role “to advise on broad spending priorities e.g. food grants or the Strategic Research Programme.” The current multi-disciplinary nature of research carried out by the Rural Environment Science and Analytical Services (RESAS) division of the Scottish Government has significant benefits in producing the integrated evidence that is required to address complex problems. The quality of research also benefits from being managed as part of a critical mass of research management expertise. To separate the issues and have food priorities set by non-research experts would reverse the progress made on environmentally-sustainable food production systems, and militate against achieving the vision set out for a Good Food Nation.

16. Finally, we return to the potential conflicts and tensions that may arise between different elements of the Good Food Nation policy. The membership of the proposed Food Commission must be properly balanced to ensure that it reflects the diverse interests covered by the policy, with an understanding of how tensions might be dealt with. But, further, the work of the Commission must be transparent. The Food Standards Agency was set up on the basis of principles that were carefully designed to insulate its work from food industry pressures. A new Food Commission must consider how it will balance and integrate the goals of growing the food and drink sector with ambitions to improve health, sustainability and developing community.

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2The Scottish Government, June 2014, ‘Becoming a Good Food Nation’ p19
3 See also: The Royal Society of Edinburgh, May 2014, ‘The Food (Scotland) Bill: a response to the Scottish Parliament’s Health and Sport Committee’
4The Scottish Government, June 2014, ‘Becoming a Good Food Nation’ p19
capacity in such a way that it can build and maintain relationships of respect and trust with all interest groups. This will require the development of transparent processes for avoiding conflicts of interest when cross-sectoral work is needed.

Q7. In what areas should indicators be set to check we are on track towards achieving our goals?

17. We set out in our response to Q2 (paragraph 4–6) some of the features that would be indicative of a Good Food Nation. There are a number of potential measures that could be used to give a picture of progress. Good food choices would be indicated by increased on- and off-trade sales of foods with good nutritional value and decreased sales of so-called junk food (food of poor nutritional quality). Improvements in health would be seen in the reversal of trends of rising obesity and incidences of other diet-related health conditions. A reduction in greenhouse gas emissions from the Scottish food production industry, and calculating emissions arising from consumption, would address some aspects of sustainability. Measures related to economic growth are already well-developed, from the share that Scottish produce has in the domestic market to a growth in exports or the number of food tourists coming to Scotland.

18. These are, of course, only examples, but we make a number of points that would apply regardless of the indicators set by the Scottish Government and/or the Food Commission. First, the Government/Commission must have a clear plan for monitoring the strategy from the outset, with both identified indicators and mechanisms in place. Some of the information required for comprehensive monitoring and measurement will come from sources that are already established (e.g. the Scottish Health Survey), but there are significant gaps.

19. Second, we suggest that the use of specific, concrete targets be avoided. Efforts made to date, in Scotland and elsewhere in the UK and internationally, have emphasised that society’s relationship with food is complex and highly resistant to change: progress towards influencing diet-related behaviour is extremely slow. The designation of largely arbitrary targets risks setting the policy up for failure, and subsequently the loss of both the political support and on-the-ground energy required to effect change. It may be more appropriate in some areas, for example in monitoring the diet-related health of society, to track trends and measure progress by the reversal of existing negative trends, or the growing momentum of positive trends. Where concrete targets are considered appropriate, they must be based on clear and comprehensive evidence that justifies their use and they must be realistically achievable.

20. Third, as is often the case, we caution against the use of solely quantitative indicators. Some qualitative reflection, for example through social surveys, will be necessary to capture changing attitudes of society towards food, and to understand the drivers that may either be changing behaviours and choices or be obstructing change. This focus on socio-economic and cultural evidence may be an area in which the Food Commission has a role to play.

21. Finally, we emphasise that it is not enough for progress to be made across the Scottish population as a whole. Diet and health inequalities will need to be addressed if Scotland is to become a Good Food Nation. Indicators, measure and trends must be monitored to assess progress in all parts of the population and across all socio-demographic groups.
Q8. What are your views on the different approaches that could be taken to help us become a Good Food Nation?

22. We welcome the commitment to a variety of approaches set out in the discussion document. A 2011 report that reviewed the global published evidence on tackling obesity emphasised the need for a “multi-component approach that can address the powerful social, economic and environmental drivers which sustain the (obesity) epidemic”\(^5\). The same complex and powerful drivers shape food choices and habits in Scotland. In addition, communities along the socioeconomic gradient have differing relationships to food and nutrition and a variety of lifestyle risk factors, so a ‘one-size-fits-all’ policy would not be appropriate.

23. We have noted the importance that the question of what is considered ‘good’ be approached holistically. Improving understanding of the processes and channels through which food is produced, purchased and consumed, amongst policy makers, producers, suppliers and consumers, is a crucial foundation from which interventions can be developed.

24. Approaches developed under the strategy must build on initiatives that have been successful to date. The Healthy Start Programme, for example, is an important vehicle for promoting healthy food intake in low-income families with young children. Equally, it is also essential that the initiatives developed under the ‘Good Food Nation’ umbrella are integrated with policies not directly connected to food but that will impact on its success. Again, this will encompass a broad range of areas, from spending decisions on money received by Scotland from the European Structural and Investment Funds, to the Community Empowerment (Scotland) Bill, to urban planning, transport and health policies that aim to increase levels of physical activity.

Q9. Do you agree with the proposed priorities?

25. The RSE broadly agrees that each of the priorities is important and represents a substantial area for focus. We comment briefly on each area below.

26. **Food in the public sector.** We particularly welcome the recognition of the need for leadership and the setting of good examples in the public sector. Improving the availability of good food choices (in terms of nutritional value, quality, taste and sustainability) across the public estate, from public sector workplaces to schools and hospitals, would be a significant step towards the vision of a Good Food Nation and a powerful lever to stimulate change in food-related behaviour and choices elsewhere. Recognising that the provision of food in the public sector is mainly contracted out to private sector providers, the design of contracts that put these elements of ‘good food’ at the core of offerings will be important.

27. **A Children’s Food Policy.** Diet in the early years of life (0-3) is critically important both for the healthy development of the child and also because eating habits are learned very early. Education and support for good decision-making at this formative time is likely to have a disproportionately positive and long-term impact. There have been many initiatives to improve the diets of children and young people in Scotland while the *Curriculum for Excellence* sets out

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\(^5\) Scottish Collaboration for Public Health Research and Policy, 2011, *‘Policy Interventions to tackle the Obesogenic Environment’*
specific ‘experiences and outcomes’ for food education under its ‘Health and Wellbeing’ strand\textsuperscript{6}. We support the principle of a Children’s Food Policy but it is difficult to comment on this priority without any detail on the proposed policy or its implementation. We do note that there is no mention in the document of the role of parents in educating and supporting their children to make good food choices. We comment below that focusing on families as a point of intervention is perhaps the most challenging level.

28. **Local food.** Championing local produce will in essence bring benefits, not least in strengthening community capacity and empowerment and in ensuring that the economic gains are spread throughout society, particularly if the reach of the movement is extended into all socio-demographic groups. However, sustainability is the bigger issue that must underpin a Good Food Nation, and one that the focus on local produce does not necessarily address. Scotland will always need to import some food products both for a varied and balanced diet, and for sustainability reasons. The priorities and approaches developed must be based on the best available evidence on the most appropriate balance among issues of sustainability, nutrition, health and economic growth.

29. **Good Food Choices.** In this response we have described ‘good food choices’ as food that is of good quality, good nutritional value, tasty, safe, produced sustainably and affordable. However, in reality, there will likely be trade-offs to be made among these elements, particularly if they are to be priced competitively. The value placed on each element will be different for different people and in different situations. The Scottish Government should be clear within its food and drink policy on what it means by ‘good food choices’. In addition, while we recognise that consumer buy-in will be an important tool in encouraging producers, suppliers and retailers to engage with the policy, we also emphasise that the individual or family level is the most difficult point of intervention. People make food choices for themselves and their families for reasons that may not be completely within their control: working patterns, busy lifestyles, food shopping and eating ‘on the go’, influenced by the options available and advertising pressures. Therefore, it is imperative that efforts to stimulate engagement and change at all points of the process are maintained simultaneously.

30. **Continued economic growth.** The Scottish food and drink sector, with the support of the Scottish Government and its partners, has seen successful growth in recent years. Further efforts to ensure that Scotland has the skills, diversity, market opportunities and resilient supply chains that support continued development and job growth are welcome. However, sustainability must be at the heart of economic growth and requires more emphasis than it has been given to date.

Q10 – Q12: Any other areas or steps to be considered?

31. Finally, we draw attention to a number of issues that have not yet been raised:

- **Alcohol.** Scotland’s relationship with alcohol is complex and clearly inter-connected with its relationship with food and with population health. We were surprised that this discussion document does not address alcohol other than in terms of the whisky sector’s strong export performance.

\textsuperscript{6} Education Scotland, ‘Health and Wellbeing Experiences and Outcomes’
• **Water.** While the Scottish Government has separately made a commitment to establishing Scotland as a Hydro Nation⁷, nurturing its water resources for long-term sustainable use, we suggest that water is a key element of both a healthy diet and sustainable food production, and therefore that some linkage should be made between the two policies.

• **Breastfeeding.** Scotland’s breastfeeding rates are among the lowest in the world and are strongly socially and culturally patterned, with rates of formula feeding increasing sharply with deprivation. Breastfeeding provides optimum nutrition and promotes self-regulation of appetite, important in the prevention of obesity.

• **Food security.** Food security is recognised in the document as a key challenge but there is little further mention of it. Scotland has the capacity to play a role in global food (and water) security, both through its own resources and its research activities.

• **Food poverty.** While the discussion document makes occasional reference to the need to improve food choices for everyone, food poverty is not explicitly addressed. This is an issue that has come to prominence in recent years and the Scottish Government has made a number of high-profile announcements of funding for food banks and projects. The development of a new food and drink policy could be a useful point at which to consider the issue in a more strategic manner.

**Conclusion**

The RSE welcomes the commitment to a refreshed national food and drink policy for Scotland from 2015 and this discussion document that sets a high-level vision to guide the actions that will support that policy. We look forward to seeing the strategy develop and the detail drawn out and would be very willing to provide any further support or input that would assist in that process.

**Additional Information**

Advice Papers are produced on behalf of the RSE Council by an appropriately diverse working group in whose expertise and judgement the Council has confidence. This Advice Paper has been signed off by the General Secretary.

Any enquiries about this Advice Paper should be addressed to Susan Lennox, RSE Policy Officer (email: slennox@royalsoced.org.uk).

Responses are published on the RSE website [www.royalsoced.org.uk](http://www.royalsoced.org.uk).

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⁷The Scottish Government, January 2012, ‘Scotland the Hydro Nation: Prospectus and Proposals for Legislation’