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
EH11 3XD

If you have any queries please contact Eugenia Christie at 0131 244 9574.
Consultation Response

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Which? response to the Scottish Government’s Becoming a Good Food Nation discussion document

About Which?

Which? exists to make individuals as powerful as the organisations they deal with in their daily lives. Which? has over 67,000 members in Scotland. Our team in Edinburgh has been campaigning on behalf of all consumers in Scotland since the Scottish Parliament was established in 1999. We campaign to tackle failing markets within Scotland and across the UK.

We operate as an independent, a-political, group social enterprise working for all consumers and funded solely by our commercial ventures. We receive no government money, public donations, or other fundraising income. We plough the money from our commercial ventures back into our campaigns and free advice for all.

Summary of our response

Which? welcomes this opportunity to contribute to the Scottish Government’s consultation on Becoming a Good Food Nation. We broadly support the ambitious vision that is set out and are keen to contribute to its delivery. This will require a joined up approach across the Government with clarity over how to prioritise competing and often conflicting objectives.

The discussion document makes it clear that while food exports have been thriving, efforts to tackle Scotland’s very poor record on diet and health have made far less progress. It is therefore essential that the Government makes improving the accessibility and affordability of healthier diets the priority.

We support the focus on public food and on developing a children’s food policy. This will require strong leadership from the Scottish Government in order to tackle irresponsible marketing practices, particularly to children, and drive the production of healthier products through reductions in saturated fat and sugar, as well as salt. It also needs to be recognised
that increasing sales and consumption of home-produced foods will not always be compatible with this objective.

The vision and strategy for its delivery also need to acknowledge that much of what we eat originates from outside Scotland and is determined by policies of multi-national companies and UK, EU and global food policy and standards. These approaches also need to be aligned with the Good Food Nation ambition, rather than undermining it. Broader collaboration and engagement of key influencers beyond Scotland is, therefore, crucial.

There is a real opportunity to build on the strengths of the Scottish food sector, better aligning food production with health and sustainability goals. As well as focusing on behavioural change across the food supply chain, there needs to be a much wider public debate about the future of Scottish food production. Which?, working with the Government Office of Science and Sciencewise, is about to undertake a series of consumer panels to deliberate over the challenges facing the food supply chain and potential demand and supply led solutions which can make an important contribution. We would welcome the involvement of the Scottish Government in this project.

Finally, a Good Food Nation must also be a nation that produces safe food that is what it says it is. In view of recent problems with food safety and a poor record of compliance with hygiene requirements in some parts of the country, it is also important to consider wider controls. It must be ensure that there is an effective and more strategic approach to food law enforcement in Scotland. The new agency, Food Standards Scotland, will have an important part to play, but will need to work very closely with local authorities in order to ensure more effective consumer protection.

Specific consultation questions

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

It is essential that the Scotland becomes a Good Food Nation. As the document sets out, food is essential to our health and wellbeing. It influences many parts of our lives and has a crucial cultural dimension. We fully support the aim to have a joined up approach that aims to address the health and environmental benefits of improving the food that is available and chosen, as well as continuing to benefit from the economic strengths of the food sector.

The challenge will be in aligning these objectives. While exports have been increasing, much of this comes from whiskey production, and there has in contrast been little progress on improving the diet and health goals that were set out in Recipe for Success. Rates are actually getting worse - with rates of obesity and overweight still rising.

Becoming a Good Food Nation is also not solely dependent on the food that Scotland produces, as the consultation generally suggests. Much of the food that is consumed by Scottish consumers originates from outside Scotland or even when produced in Scotland is in the control of companies operating UK and EU-wide - and increasingly the product of complex, global supply chains. It is therefore important that the policy creates a platform for engagement of these important actors, influencing their policies and approaches.
2. How would we know when we had got there? What would success look like?

Important indicators of success include:
- adoption of a consumer-centred approach to food policy which prioritises access and affordability of healthier choices for all
- alignment of policy objectives across Scottish Government directorates and agencies
- alignment of Scottish food production with wider food policy objectives, increasing the choice of healthy and sustainable options that are available
- food production methods used to enhance food security and sustainability are safe and acceptable to consumers
- high level of consumer awareness and engagement with the challenges facing the food system
- easy access (price and availability) to a choice of healthy, sustainable food whoever you are, whichever income bracket you fall in and wherever you live
- progress towards meeting Scottish dietary goals and ultimately achieving them across the population, ie. reductions in salt, saturated fat and free sugar intakes and an increase in fruit and vegetable consumption
- decline in rates of overweight and obesity
- decline in rates of diet-related disease including cancers, coronary heart disease, stroke, diabetes and dental caries
- increased water efficiency in the food sector
- reduction in rates of food poisoning, particularly given higher rates of some pathogens, such as E coli in Scotland than the rest of the UK
- no significant incidents of food fraud or misleading practices
- over 95% of high and medium risk food premises are compliant with hygiene requirements
- standards for healthy, sustainable food developed and implemented across all public institutions and controlled premises
- reductions in food waste and more efficient use of resources across all parts of the food supply chain
- decline in carbon emissions originating from the food and agriculture sectors
- food is clearly, transparently and honestly priced
- improved transparency across supply chains so that consumers are more aware of how their food is produced
- food is clearly and reliably labelled, enabling informed choices about health, quality, welfare, environmental impact and origin
- consumers can rely on Food Standards Scotland, working with local authorities to ensure effective compliance with food law requirements
- a high level of consumer confidence in food produced and sold in Scotland.

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

We generally support the vision, ie: “By 2025, people from every walk of life, will take pride and pleasure in the food served day by day in Scotland. An increase in Scottish food exports will attract overseas visitors and the quality of the food we serve will become one of the key reasons to travel to Scotland. Everyone will know what constitutes good food and why. All players in Scottish life - from schools to hospitals, retailers, restaurants and food manufacturers - will be committed to serving such food. Its ready availability will have
contributed to improvements in children’s wellbeing and hence outcomes. Scottish suppliers will have developed their offering so that local increasingly equals fresh, healthy and environmentally sound. The most intractable dietary-related diseases will have begun to decline as will the environmental impact locally and worldwide, of our food consumption. The food industry will be a thriving well-known feature of local and national economies, with each part of Scotland rightly proud of its culinary heritage, past and present”.

As stated above, we do, however consider that the vision also needs to look beyond Scotland and create a platform to influence wider food industry policies that will ultimately determine how food is produced, what is available and how it is marketed and consumed. This will require engagement with multi-national retailers, caterers and manufacturers as well as agri-businesses that supply Scottish producers.

It will also require a more in-depth understanding of consumer attitudes towards the way that food is produced in Scotland and a broader debate about how some of the tensions and trade-offs that will hamper delivery should be addressed.

Which? conducted a series of debates into the ‘future of food’ in 2012 that can help inform this. This research included a citizens’ panel in Glasgow which explored the range of challenges facing the food supply chain - from climate change, potential food shortages and volatile food prices to tackling obesity and improving food safety. It also looked at a range of solutions and considered the actions people participating thought needed to be a priority for Government, food retailers, producers and themselves.

Which? is about to commission further research that will build on this work, exploring people’s attitudes towards both supply and demand solutions to these challenges and looking in more depth at food production methods and technologies. This work will be a collaboration with the Government Office of Science working with Scienwise, and will include a discussion panel in Scotland.

In order to achieve the vision, consumer interests have to be central to policy and also considered at every stage of the supply chain. This includes decisions about research priorities and funding.

The vision will also require a more in-depth and frank consideration of the opportunities and threats posed by Scottish food production, as well as by food imports and the supply chains they rely upon. Ultimately, food production goals have to be better aligned with food consumption ones.

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

Which? represents Scottish consumers and so our priorities are for people to be able to easily access healthy, affordable and sustainable food that is safe, what they expect it to be and that it is clearly and transparently priced. We hope that as a result of this discussion paper, the Scottish Government will be able to drive forward a coherent policy that has consumers at its heart.

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There are many challenges facing the food supply chain. This includes increasing global demand for food and the impact of climate change for example. We hope that this initiative will help to create a much wider debate about the potential solutions and what they mean for Scottish food, and that there will be a much greater sense of urgency about implementing the food policy at all levels.

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

It will be essential to ensure that there is clarity about the relative priority given to the objectives within the vision across all government departments and that they are clear about their role in delivering it and there is a clear delivery plan. A lot of the food Scotland produces does not fit with health and sustainability goals and this must be recognised. As a lot of policy will be determined at EU level, it is also essential that the Scottish Government understand its impact - both positive and negative (for example in the case of the Common Agriculture Policy). Buy-in across the breadth of the food industry, as well as wider stakeholders will also be crucial. As many operators will operate UK-wide, it is also important that the Scottish Government looks to collaborate.

It will also be important to reach a common understanding of the priority issues for ensuring food sustainability in order to ensure that this is at the heart of the approach and a clear understanding of how success will be measured by all interested parties.

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

Depending on its make-up and status, a Commission could have an important role in ensuring a joined up approach and driving forward the vision. It will be essential that there is a balance of interests represented in the Food Commission if it is to deliver, including strong consumer and public interest representation. We also welcome the idea of a network of food champions. Something similar was tried several years ago, along with a food ‘tsar’ so it will be important to learn from the experience of this in order to ensure that they have most impact.

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

We have made some suggestions above and in addition consider that they should:
- cover the short, medium and long-term
- address the process changes that are needed and forms of engagement required
- take account of existing indicators, such as the dietary goals
- build on existing work to develop indicators for broader sustainability
- ensure coherence - economic indicators need to be aligned with health, environmental and social ones, for example, recognising the common interest in the longer-term.

It will also be important to assess progress against the relevant Scottish Government national indicators, for example, increase the proportion of healthy weight children, improve children’s dental health, improve self-assessed general health, improve mental well-being, and increase cultural engagement.

8. What are your views on the different approaches that could be taken to help us become a Good Food Nation?
We would welcome the opportunity to be involved in the Commission’s work setting the priority areas for action. Five areas are proposed in the Strategy:

(i) **Food in the public sector**

We agree that food in the public sector is crucial. Government has to lead by example and, as the consultation makes clear, public food has symbolic importance. Although the paper states that in economic terms the impact of public sector food may be low, it has a very wide reach, particularly for vulnerable groups of consumers. Improving its quality can therefore have enormous implications for people’s diets.

We welcome the work that has already been undertaken to improve food in schools and hospitals. We also welcome the intention behind the Procurement Reform (Scotland) Bill to focus more on outcomes not outputs and ensuring the best balance of cost, quality, health and sustainability. Standards that ensure the availability of healthy and sustainable food must apply to a much broader range of premises, including local authority controlled premises such as leisure centres. The healthy choice should be an easy and affordable choice.

Public sector food premises should also help to provide the benchmark for best practice in terms of food hygiene and wider food standards practices, ensuring responsible and reliable sourcing.

(ii) **A children’s food policy**

We agree that children’s food still needs a much stronger focus and agree with developing a specific Children’s Food Policy. We think that this has to be ambitious and should start before pre-school. Maternal and infant nutrition also need to be addressed.

There have already been some positive developments with food in schools, but the momentum needs to be maintained. Initiatives need to be extended to look at a wider range of settings and other influences on children’s food choices.

A key area that needs to be tackled is the marketing of foods to children. Despite a clear commitment in Recipe for Success\(^2\) to “Mapping and exploring possible actions to constrain non-broadcast marketing of high fat, sugar or salt foods to children”, there have been no concrete steps taken. Some initiatives, such as the decision to allow Irn Bru to be an official sponsor of the Commonwealth Games, have also run counter to this commitment. World Health Organisation (WHO) recommendations make it clear that governments should set clear definitions for the key components of the policy, thereby allowing for a standard implementation process\(^3\).

The initiative to develop a British Standard as a possible way forward failed to make progress as the industry trade associations representing the companies that need to take more action, pulled out after the first meeting. This work therefore needs to be reinvigorated so that outstanding areas such as sponsorship, packaging and digital media are addressed and

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\(^3\) Set of Recommendations on the Marketing of Foods and Non-alcoholic Beverages to Children, World Health Organisation, 2010, endorsed by the World Health Assembly (Resolution WHA 63.14).
teenagers as well as younger children are protected. The creativity of food marketers should instead be channelled into helping to promote healthier choices.

3. Local Food

We agree with the approach set out to work with communities to help promote local food initiatives. This can help local economic development as well as having wider social benefits and help to reconnect people with their food.

Ensuring that everyone in Scotland has access to an affordable, healthy and balanced diet for themselves has to be at the heart of the revised policy. The issues facing low income consumers therefore need to be a key focus of the new approach. This needs to consider what local food can offer, but also be realistic about where most people are buying their food from. Working with the main retailers is also going to be crucial in order to help ensure that people have access. This includes for example, ensuring more responsible price and other in-store promotions and building on efforts to increase the availability of healthier, and ultimately more sustainable, food choices on offer through product reformulation and other initiatives. The Scottish Government needs to help drive this by defining what it sees as responsible marketing and setting targets for reductions where there are unacceptably high levels of saturated fat, free sugars and salt.

It is important that when looking at local food, the Scottish Government also focuses on the food available in convenience stores and in local cafes, restaurants, take-aways and other out of home premises.

4. Good Food Choices

We agree that behaviour change is an important part of the strategy that is needed. This will apply to all stages of the food supply chain, ensuring that there is a genuine understanding and commitment to good food.

As is stated retailers have an important role as their reach impacts on almost all aspects of food and drink. Large caterers and manufacturers are also important in this respect. A farm to fork approach must be adopted.

Consumer buy-in is also going to be crucial. Our research shows that people are interested in eating good food - whether in terms of quality, health or safety, for example - but price has become a very dominant factor in recent years. A survey as part of our Future of Food research, for example, found that the most important factors for Scottish consumers when buying food (in order of importance) were: price, quality, taste, ingredients, health/nutritional content, food safety, animal welfare, convenience, whether locally produced, buying in season, fairtrade and finally, environmental impact.

The deliberative research that we conducted showed that many people were unaware of the issues facing the food supply chain, particularly in relation to environmental impacts and food

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4 Populus, on behalf of Which?, surveyed 2008 UK adults grocery shoppers, of which 147 were residents of Scotland, online between 28th and 30th June 2013. Data were weighted to be representative of the UK population,
security. However, once the issues were explained, people became engaged and wanted to know more. They also said that it would influence their choices, or at least they aimed to shop differently as a result of the discussion as these comments from the citizens’ panel held in Glasgow help to illustrate:

“A lot of the kind of information people got [about environmental impact of food], they felt they hadn’t heard before, it was news to them. We thought it should be more in the public domain, that kind of information.”

“I will buy less. I don’t need half of what I buy but because it’s on special I do…and waste it.”

Education, information and maintaining the food conversation, as is suggested, will therefore be important. But it is crucial that attention is focused on the environment in which people make their choices. Even if people want to make healthy and more sustainable choices, a range of factors including what’s available, convenient, cheaper and looks tastier may mean that they struggle to put it into practice.

Counteracting misleading information, such as marketing campaigns designed to increase consumption of foods that it is advised people eat less of also have to become more responsible – and people need to have confidence that they can trust claims made on food.

It is also important that there is greater clarity around the advice about what is ‘sustainable’, as well as what is healthy in order to ensure consistent messages and determine which types of foods should be developed and promoted.

5. Continued economic growth

We agree that there should be a virtuous cycle so that the more progress is made with domestic food culture, the more Scotland’s reputation will be enhanced, benefiting the sector’s economic performance.

A clearer plan should be developed in order to more clearly define the opportunities for growth that will also align with wider objectives around health, sustainability and longer-term food security, as well as how the local food economy can be strengthened and supply chains shortened. This should consider what can be promoted and grown in Scotland and what makes more sense to import.

The industry promotion strategy work should also be more linked in to work to understand consumer attitudes towards food production - so that it can be clear what types of production methods are appropriate to use or not.

10. What other areas would you prioritise?

There are three areas that we particularly wanted to highlight:

- Accessibility and affordability of healthier choices
The vision for Scotland as a good food nation should reflect our biggest ambitions as well as our immediate sector goals. The strategy identifies many of the individual issues impacting on price and access but falls short of making it an explicit overarching aim to tackle both.

- **A wider food debate:**

The strategy emphasises behavioural change, but as mentioned above, we consider that there also needs to be a more fundamental debate about the type of food production and food system Scotland needs and Scottish consumers want. There are many challenges facing the food supply chain - health, environmental, social and economic - and it is important that they are openly considered, along with potential solutions.

As already described, the debates that Which? will shortly be conducting with the Government Office of Science will aim to do this, helping to ensure that consumer perspectives can help shape government and industry approaches, as well as priorities for research funding. We would welcome the opportunity to work with the Scottish Government on this.

- **Compliance with food hygiene and standards:**

It is essential that consumers can have greater confidence that their food is safe and what they expect it to be. Ensuring a high standard of hygiene, wider safety (eg. chemical contaminants, safety of new technologies) and standards also needs to be an important part of the strategy. The horsemeat contamination incident, as well as several subsequent findings of fraud by Which?5 and others, has shown that the food supply chain can be vulnerable. It has also shown that there can also be problems closer to home as our research finding fish substitution in Glasgow fish and chip shops demonstrated.

A Which? survey conducted in September6 found that half (51%) of people residing in Scotland are worried that a food fraud incident will happen again. 3 in ten (31%) aren’t confident that the food they buy contains exactly what is stated on the ingredients list. This increases to half (49%) in the case of food bought from take-aways. A fifth (20%) say that in the last 12 months they have changed the type of meat products they buy because they are worried about food fraud.

Which?’s analysis of Food Standards Agency data on levels of compliance with hygiene rules7 has also shown a great deal of variability across Scottish local authorities. Effective industry checks are essential. But consumers also need to have confidence that there is an effective system of enforcement in place that focuses on the highest risk premises and shows that crime or sloppy practices won’t be tolerated.

The new Food Standards Scotland will have an important role in making this happen. It will also need to work closely with local authorities where resources for food law enforcement are under pressure. A more strategic approach that makes most effective use of skills and

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6 Populus, on behalf of Which?, interviewed 2106 UK adults, of which 200 were residents of Scotland, online between 5th and 7th September 2014. Data were weighted to be demographically representative of UK adults.

resources across the local authorities needs to be put in place. Ensuring that consumers can have confidence in what they eat must be at the heart of the strategy. This will benefit consumers as well as responsible businesses.

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

A key challenge will be to ensure the wider engagement of the Scottish public and not make this a ‘behind the scenes’ debate among the usual suspects and interest groups. As already referred to above, the Scottish Government will also need to find a mechanism to engage the many elements of the food chain both within Scotland as well as those outside the country that have a huge influence on what is produced and how it is marketed.

12. What else should be considered?

Food production methods can be controversial as we have seen with issues such as genetically modified (GM foods), animal cloning, ‘mega’ dairies and use of hormones in meat production. It is therefore important that in considering how to become a Good Food Nation, there is a full discussion and understanding of what is and isn’t acceptable to consumers and under what circumstances. Our future of food research, for example, found that the acceptability of new technologies depends on several conditions:
- that risks are fully and independently researched and understood
- that the potential to enhance more traditional approaches is fully explored as the first option, for example, in order to address yield gaps
- there is much greater transparency about the potential risks as well as about regulatory oversight
- a clearer understanding of the relative risks and benefits - some highlighted the need to balance short term risks with longer-term issues of availability
- there is not over-reliance on one particular approach or solution - a range of solutions are needed
- the commercial interests of large multi-nationals should not be the main driver of innovation and developments need to be controlled by government to ensure they are focused on the public interest
- avoiding false promises - new technologies proposed need to be realistic and offer real benefits for UK consumers.

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 the next 12 months.

Which? will play an important role representing consumer interests through our policy and campaigns work. This currently includes inputting into the proposals for Food Standards Scotland to ensure that it delivers for consumers.

Our food fraud and food enforcement campaigns and research have received a strong response from our on-line supporters and are helping to promote the need for improvements to the system so that consumers are adequately protected. Our food prices campaign is achieving change in terms of simpler and more transparent supermarket pricing. Our magazine reports are also helping to promote these issues, along with research to help consumers compare products based on their health credentials for example.
We will also be promoting a wider debate around the future of food and how it is produced through the deliberative workshops we will be organising in the coming months with the Government of Science and would welcome the involvement of the Scottish Government in this project.

Which?
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