Dear Ms Christie

Recipe for Success: Scotland's National Food & Drink Policy. Becoming a Good Food Nation

Thank you for providing the Scottish Environment Protection Agency (SEPA) with the opportunity to comment on the above consultation document.

SEPA welcomes this document which reaffirms the Scottish Government's commitment to promoting the sustainable economic growth of the food and drink industry. We fully support the new aspiration for Scotland to become a Good Food Nation, a Land of Food and Drink. We also strongly support the proposed 2025 vision statement on what Scotland should be aiming to achieve.

The consultation has rightfully a strong focus on social, health and economic issues. However there is very little focus on environmental issues. SEPA considers that sustainability should be at the core of this policy document. Specifically, sustainable environmental, economic and social development goals should act together as the guiding principles for the policy’s development.

The international reputation of Scotland’s high quality food and drink is dependent on our unspoilt landscapes, clear air and good quality waters. The Cabinet Secretary for Rural Affairs and the Environment, Richard Lochhead stated on 1 October 2014 that “Scotland’s magnificent natural environment is essential to food production in this country. The grass on our hills, our pristine waters, clean air and diverse wildlife is vital for the success of Scottish agriculture and our £14 billion food and drink industry”. SEPA therefore recommends that the Food & Drink Policy is better integrated with Scotland’s environmental needs.

SEPA would like to see the Food & Drink Policy identify and encourage ways that food and drink production and consumption can help reduce the impacts of climate change, as well as improve Scotland’s wider environment, including water, air and soil quality. For example, the River Basin Management Planning (RBMP) process confirms that the most challenging and widespread pressures on the water environment are those associated with agricultural land use, namely diffuse pollution and physical degradation. There is significant potential for realising multiple benefits to the environment.
and to Scotland’s food and drink sector through active promotion and implementation of sustainable farming practices. We welcome the provisions in the Scottish Rural Development Programme which support measures to improve water, air and soil quality opportunities.

The Food & Drink Policy should also be tied directly to the Scottish Government’s Climate Change Bill targets of cutting emissions by 80% by 2050. This would mean further encouraging more sustainable farming practices that reduce greenhouse gas emissions. Measures to reduce emissions from food and drink transport should also be considered.

As a nation, we waste one fifth of the food bought every year – which is costly and bad for the environment; 630,000 tonnes of food and drink is thrown away annually – costing the public over £1 billion and creating greenhouse gases.

Food waste (as well as packaging) therefore needs to be better managed. The Food & Drink Policy should be linked to improved recycling targets for both. SEPA notes that Zero Waste Scotland is working closely with Scotland’s Food and Drink sector (as well as and other industry bodies) to design and deliver industry-wide sustainability strategies, encompassing reductions in waste and energy and water use. SEPA would be pleased to engage further on this with all these organisations.

Finally, SEPA considers that this national food and drink policy needs to be accountable to be effective. There are many aspirations contained in the consultation which are very good and needed. However the policy should set targets and ensure that these are linked to a specific timeline. These should be linked to impacts and other progress markers.

As a public body committed to openness and transparency, SEPA feels it is appropriate that this response be placed on the public record. If you require further clarification on any aspect of this correspondence, please contact Mark Aitken, Principal Policy Officer who is based at SEPA Stirling Office, at the address shown.

Yours sincerely

[Redacted]

Janice Milne
Head of National Operations