Preface
At home and abroad, wildlife is under pressure and many species and habitats are declining. Many of these declines are directly linked to how we produce, grow and catch our food – on land and at sea. Over the past fifty years or more, the intensification and specialisation of our food production systems have had significant impacts, not just on wildlife, but on our soil, air and water resources and on our climate. Tackling these problems will require reform in all areas of food policy, aligning towards a common vision for a better food system. The basis of such a system must be production, growing and catching methods that better protect, enhance and help to restore our precious marine and terrestrial wildlife, and the natural environment on which it relies.

RSPB Scotland believes our food system must provide environmentally sustainable, healthy and affordable food for Scottish people and viable and sustainable livelihoods for producers and processors at home and abroad. We want to see a vibrant and thriving food system that puts the natural environment and people at its heart. We believe that environmentally sustainable and socially just food should be the norm for all, rather than the expensive exception, both for domestically produced and imported food. As a nature conservation organisation, our primary objective is for the health of the natural environment, affected by every step of the supply chain from producer to consumer. We understand however that the environmental impacts of food production cannot be seen in isolation. Rather, they are part of a complex and interrelated set of issues that make up our food system, including but not

1 The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654
2RSPB (2012) State of Nature
limited to, public health, animal welfare and social justice. Addressing the big food challenges will, undoubtedly, demand more joined up thinking.

Key failures of the current food system are:

- **Unsustainable production, growing and catching systems** that deplete our natural assets and the ecological services that flow from them. This reduces the intrinsic value of our countryside and seas and compromises our long term ability to produce food for our needs.

- **Disjointed and weak policy approaches and the dominance of ‘sustainable economic growth’ rhetoric** that supports current production systems and fails to ‘join the policy dots’. For example, we are footing an enormous health bill for problems that stem from poor diet and over consumption, whilst concurrently accommodating fast food chains in hospital food halls and providing patients with a poor diet.

- **Perverse pricing** that charges less for more environmentally and socially damaging food and heavily processed food and adds a premium to healthier food produced to a higher environmental, animal welfare and social standard e.g. organic, certified sustainable, and fair-trade. Not only does this leave the environmental and social costs of poor production and harvesting systems to the public to absorb, it also means the poorest in our society can only access the poorest quality food.

- **Excessive waste** throughout the system. For example, a significant level of produce never reaches consumers for reasons ranging from post-harvest spoiling through to retailer ‘quality standards’\(^3\). Furthermore, ‘post plate’ wastage in the UK amounts to almost a quarter of the total food bought\(^4\). This means we are degrading land and seas to produce, grow and catch food that is thrown away or never even reaches the market.

- **Lack of resilience** in our food system caused by unsustainable production, a dominance of big players, often complex and opaque supply chains and focus on mass markets, leaving it increasingly vulnerable to climate change.

- **Lack of leadership** from Governments, who should be demonstrating to the public in their procurement practices that it is not only possible to make environmentally sustainable and socially just food choices, but that it is affordable, can support local economies and provide a more nutritious diet.

RSPB Scotland believes these failures can be addressed but it will take considerable and sustained effort by Government, the private and third sectors, working together. Inevitably, a continued focus on economic growth rather than sustainable development and on industry rather than societal needs will result in a continued “vision” of increased specialisation, increased yields, even bigger ‘big business’ and a bit less environmental damage, which will simply not be good enough and come at considerable cost to Scottish society. Governments currently intervene in the food system in many ways (subsidies, business taxes/rates, trade support etc). All these interventions should be redesigned based on sustainable development principles, for example, enabling thriving and viable businesses delivering healthy food in a manner that conserves and enhances the environment. We therefore welcome this consultation and the ideas in it as the start of a process to turn Scotland into a genuinely ‘Good Food Nation’.

\(^3\) WRAP (2011) Resource Maps (RSC-008)
\(^4\) WRAP (2009) Household Food and Drink Waste in the UK
CONSULTATION QUESTIONS

1. How important do you think it is that we aim to be a Good Food Nation?
We think it is essential that we not only aim to become, but are successful in becoming a Good Food Nation.

The consultation document sets out many reasons, with which we agree, as to why we cannot continue in the current vein and must strive to do better. It is not comprehensive however, and fails to give due attention to the sustainability of production systems, while giving excessive attention to the poorly defined concept of sustainable economic growth.

The way we produce, grow and catch food at home and abroad can be detrimental to our natural environment, causing species and habitat loss, and ultimately undermining our ability to meet our food needs. The effect on biodiversity of food production in the UK is clearly evident in, for example, the catastrophic declines in farmland birds such as corn bunting and corncrake since the 1970s, and continued losses of sharks, skates and rays from Scottish coastal waters due in part to over fishing\textsuperscript{5}. There is also evidence of impacts on water quality, greenhouse gas emissions, flood risk and bio-security to name only a few wider environmental concerns. For example, the best figures available suggest that agriculture and related land use accounts for 21% of Scotland’s total Green House Gas (GHG) emissions, and accounts for the majority of non-carbon dioxide emissions (e.g. nitrous oxide and methane)\textsuperscript{6}. Scottish aquaculture can lead to further overfishing due to unsustainable sourcing of feed, the nutrients, chemicals and antibiotics from poorly sited farms cause eutrophication and pollute protected areas and the wider marine environment, escaped farmed salmon spread sealice to wild fish populations, and predator control around farms can endanger protected or endangered species and other marine life\textsuperscript{7}. This is all without taking into account the environmental impacts of feed imports for example that are required to maintain our current system. The environmental impact of food production globally is almost impossible to measure but is well documented in specific cases, such as palm oil.

Environmental impacts of our food system are not limited to the production stages. The longer and more complicated the supply chain between primary producer and consumer, and the more processes food passes through, the greater the opportunity for environmental impacts. This is particularly the case in relation to water resources and energy use which in turn has impacts on our climate.

In becoming a Good Food Nation, based on sustainable production systems for domestically produced and imported goods, Scotland will be going a long way towards addressing many environmental issues and conserving nature and its services into the future.

2. How would we know when we had got there? What would success look like?
Success would be a vibrant and thriving food system in Scotland that has the natural environment and people at its heart. Environmentally sustainable and socially just food

\textsuperscript{5} RSPB (2012) State of Nature
\textsuperscript{6} http://www.scotland.gov.uk/Resource/0045/00452084.pdf
\textsuperscript{7} Joint NGO paper (2014) Priorities for environmentally responsible aquaculture in the EU
would be the norm for all, rather than the expensive exception, both for domestically produced and imported food.

In terms of sustainable production, we will know we have achieved this when:

- Indicators for soil, air and water quality, biodiversity and GHG emissions (as negatively affected by food production) are on a positive and improving trend

Getting there will mean:

- Improving our technical knowledge of the environmental impacts of food production, growth and catching, developing solutions to address these impacts, and defining what sustainable systems and practices are.
- The widespread adoption of sustainable production systems and practices throughout food supply chains driven by:
  - Appropriate Government policies (regulation, information provision, advice and incentives)
  - Markets (prices and consumer demand)

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

As with the rest of the document, we agree with large parts of the vision but think there is an unresolved tension between the first half – export, tourism, big economic gains, and the second half – environment, health, diet, social justice issues.

We welcome the inclusion of the aspiration for local food to be environmentally sound and for the local and global environmental impact of food consumption to have begun to decline. However, we would like to see the vision (and the rest of the document) being bolder in its aspiration and commitments - by 2025 we believe it is possible to do more than simply aiming for ‘increasingly environmentally sound’ production and environmental impacts that have ‘begun to decline’. For example, Scotland is committed to meeting biodiversity targets by 2020⁸, this commitment should be referenced and any Good Food Nation strategy designed to contribute its part. We want the vision to aim for Scotland being well on course for reducing the environmental impacts of its food system, showing a consistent improvement in environmental indicators. The cost of this might be slightly slower but more sustainable economic growth – the development of export markets based on genuine quality of production methods and product may take longer than the development of export markets based on a good sales pitch and pursued to the exclusion of environmental and social concerns. We believe the vision, and the entire document, need to more explicitly acknowledge this trade-off in order to ensure all parties start with the same understanding of what a ‘Good Food Nation’ is.

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

From the sea bird cities found all around our coastline to the ‘flying barn doors’ that are the sea eagles on Mull, we know people love and value Scotland’s wildlife. Indeed, the net economic impact of wildlife tourism on Scotland’s economy is estimated to be £65 million,
creating the equivalent of 2,760 full time jobs\(^9\), and recent surveying in Europe found an overwhelming 95% of Europeans feel that protecting the environment is important to them personally and 81% support environmentally focussed legislation\(^{10}\). Being a Good Food Nation for RSPB Scotland primarily means securing wildlife into the future, and the enormous pleasure its existence brings our members and the public at large.

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

As per our response to question 3, we think there is a need to better clarify and ensure understanding of what is meant by a Good Food Nation. There must be a commitment to a sustainable food system from all parties – that is one that operates within environmental, social and economic limits and does not prioritise one at the expense of the other two.

Furthermore, Chapter 6 of the Strategy document does not set out the full list of problems to be addressed and therefore we would like to see discussion and agreement on the challenges we face. For example, there is no mention of the species and habitat loss caused by farming, fishing and aquaculture. Without this recognition, and a commitment to address the issue, the strategy is incomplete and will not achieve its own objectives.

Finally, in order to be able to measure success we believe there is a need to establish a full set of indicators which would show whether Scotland has become a Good Food Nation. Targets would also be required with agreed timetables, actions and organisations responsible for meeting targets identified. Monitoring processes must also be put in place. This formal, transparent and accountable structure will ensure there is action and real progress.

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

We welcome the proposal for a Food Commission and RSPB Scotland would be keen to be a member of it. The Commission needs to be made up of stakeholders from a wide cross section of interests applicable to food – this must not simply represent food industry interests. We want to see the Food Commission have significant advisory powers and agreement from Ministers to act upon its recommendations.

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

RSPB Scotland believes that it is essential to have indicators to show whether food produced, grown and caught in Scotland is done so in a sustainable way with minimal impacts on Scotland’s wildlife and environment.

Indicators should include:

- Farmland habitat and species indicators. For example, the farmland bird index
- Marine habitats and species indicators
- Environmental baselines, including climate change indicators, soil and water quality indicators. For example, food production in Scotland must contribute to Scotland

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managing its seas to achieve Good Environmental Status by 2020, as required by the EU Marine Strategy Framework Directive.

The majority of these indicators would be based on information already existent and collected for other purposes – for example, for progress towards the biodiversity strategy, under the Birds and Habitats Directives and Aichi Biodiversity Targets, and progress towards Good Ecological Status under the Water Framework Directive. It should not be an onerous task to establish a set of indicators for sustainable production and we would gladly contribute to this process. Indeed, while Government is already committed to progress in many of these areas, that progress is unnecessarily slow. Underlining the linkage between environmental aims and the Good Food Nation social and economic ambitions, may concentrate minds and aid the achievement of all objectives.

8. What are your views on the different approaches that could be taken to help us become a Good Food Nation?
There are many things that need to happen for Scotland to become a Good Food Nation, key for RSPB Scotland would be:

- **Support for environmental sustainability throughout the supply chain**, including primary production and harvesting – in Scotland this means using existing policy mechanisms to best effect, better incentivising the ‘right’ approaches, better regulating and enforcing this regulation to establish a meaningful environmental baseline, providing advise and demonstrating best practice. Abroad this means using and encouraging others to use purchasing power to support more sustainable production.

- **Strong and joined up policy approaches and clear communications between different arms of Government**. For example, this Good Food Nation document barely makes mention of the CAP, recent decisions on which, signed off by the same Cabinet Secretary promoting this document, could have made a much more significant contribution to the aims of this document than they did. Not least, it could have much better rewarded Scotland’s ‘High Nature Value Farmers’ – those farmers whose farming systems support high levels of biodiversity. Conversely, the document also fails to mention the newly reformed Common Fisheries Policy, which places environmental sustainability at the forefront of its objectives, incentivises using fishing techniques with reduced environmental impacts and aims to reward sustainable fishing businesses with access to fishing opportunities and funding, for example.

- **A move towards true cost pricing for food**, making ‘better’ food more affordable than ‘bad’ food. In the transition to this, promotion of branding schemes that are known to represent healthier, more sustainably produced, or more socially just production such as organic, fair trade and certified sustainable. In addition, not withstanding its limited powers in this field (pending the outcome of the Smith Commission), the Scottish Government and Parliament should consider how it might use fiscal levers – to tax ‘bad’ food more and ‘good’ food less.

- **Tackling of waste throughout the system**, including working with retailers to limit the waste caused by quality standards, and working with consumers to improve planning, purchasing, storage and preparation of food to try and reduce domestic waste. Consideration should also be given to what approaches might limit waste post harvest and pre purchase both at home and abroad – i.e. including imported
goods such as rice, where post-harvest losses are estimated to range between 10-37% through handling, drying and transport\textsuperscript{11}.

- **Increasing resilience in the system**, including reducing reliance on a limited number of producers, processors, distributors and retailers. Support of local and seasonal food initiatives might be one way to do this - improving local economies and diversity by increasing the number of local businesses and shortening supply chains will all reduce the vulnerability of the system to climate change and extreme events.

- **Leading by example.** The Scottish Government needs to be at the forefront of the transition to a Good Food Nation, demonstrating to the public in their procurement practices that it is not only possible to make environmentally sustainable and socially just food choices, but that it is affordable, can support local economies (at home and abroad) and provide a more nutritious diet. A good first step in this would be to increase the amount of organic, certified sustainable, fair-trade and RSPO (palm oil) food it and all public bodies purchase.

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?

We are deeply concerned to see an initial focus on ‘continued economic growth’. RSPB Scotland is opposed in principle to the concept of continued economic growth in isolation. Rather, we advocate sustainable development, whereby economic growth is pursued only within environmental and social limits. Short-term economic growth has often been at the expense of medium to long-term economic development. In principle, the Scottish Government is also committed to the five principles of sustainable development\textsuperscript{12} - we refer you to parliamentary question answers of the 13\textsuperscript{th} July 2009 in which Mr Lochhead confirmed continued commitment to sustainable development as defined by the UK framework\textsuperscript{13}. This commitment appears to have been superseded (without announcement) by the use of the poorly defined term ‘sustainable economic growth’\textsuperscript{14} but we still believe a food strategy should refer to and be built on the five principles, including operating within environmental limits.

It is the underlying focus on economic growth in isolation, rather than sustainable development, that we believe creates the tension within this document referred to previously. There is clear desire within this document to develop a Scottish food system based around the principles of sustainable development, one that can create an economically viable industry based on quality production, produce and imports, equity and environmental improvements. However, the repeated focus in the document on ‘economic growth’ gives the impression that this, in the form of developing export markets, may take precedence over


\textsuperscript{12} http://archive.defra.gov.uk/sustainable/government/publications/uk-strategy/documents/SecFut_complete.pdf

\textsuperscript{13} http://www.theyworkforyou.com/spwrans/?id=2009-07-13.S3W-24913.h#gS3W-24913.q0

\textsuperscript{14} SE LINK (2014) Revising Scotland’s National Performance Framework
the other essential components of sustainable development and generally increasing quality
of life in Scotland, rather than be balanced with these other areas as it should be. We
recognise the importance of export to the Scottish economy, but do not think all export is
automatically ‘good’ because it leads to economic growth, and vice versa. Rather, each
case should be looked at on its own merits and assessment made as to whether there is
sufficient balance between the goal of economic growth and the principles of sustainable
development for developing that particular product and market.

In the context of a Good Food Nation, we suggest it is more appropriate to consider how
sustainable development of the food and drink sector can provide wider benefits for Scottish
citizens. For example, how can more of the jobs and economic benefits of products such as
salmon and whisky remain in Scotland rather than flowing to businesses which operate here
but are overseas companies. We would also focus on aspects such as strengthening the
local food economy and shortening supply chains, thereby capturing economic benefits more
locally and building resilience to climate change. Importantly also, there is opportunity here
to improve environmental and social conditions abroad through proper scrutiny of choice
imports (for consumption and feed) and supporting work overseas that develops sustainable
practices. Work in this area, starting with impeccable Government procurement, would go a
long way to developing the reputation of Scotland as a truly ‘Good Food Nation’ globally as
well as nationally. Although there are many areas where improvements can be made when
it comes to imports, the production of palm oil is currently one of the most urgent. At a
minimum, Scottish Government and all public bodies should ensure all imports of, or
containing palm oil are RSPO certified sustainable.

As per our previous responses, RSPB Scotland strongly supports initial focus on ‘Food in the
public sector’, ‘Local food’ and ‘Good food choices’. However, it is important this focus on
influencing the consumer is coupled with an initial focus on tackling production so that it is
possible for Governments through to the general public to make ‘good’ food choices.

10. Which other areas would you prioritise?
RSPB Scotland recommends that the strategy prioritises work to address a number of
fundamental issues:

**Sustainable production.** This is barely mentioned in the document but if the strategy is to
truly enable Scotland to become a Good Food Nation then it must cover food from soil to
spoon, from fishing net to fork. This includes positively influencing how food can be more
sustainably produced, grown and caught. Without this, any subsequent strategy is “holed
below the waterline”.

**Food Waste.** Waste of food at all levels; producer, processor, distributor, retailer and
consumer, affects Scotland’s people and environment. Food waste impacts supply, and food
affordability in addition to production of greenhouse gases. This could in part be addressed
by ‘good food choices’ if this covers work on enabling better planning, purchasing, storage
and preparation of food to try and reduce domestic waste. But it will also require work with
retailers whose quality standards drive waste at the production end.

**Resilience in food systems.** With a changing climate, how we grow and catch our food and
what food we eat will be different in the future to what it is now. Farming practices will have
to adapt if they are to remain viable and resilient to climate change trends and extreme weather impacts. The same is true for our marine fisheries and the seafood we consume. Increasing resilience and adapting our food systems should be part of the strategy.

**Quality food as a priority.** We believe that the emphasis in Scotland’s food strategy should be on producing, consuming, exporting and importing quality not quantity. This should be for all income groups, i.e. good food should not be the privilege of the rich. To address health issues related to food we should promote quality over quantity. This is especially true for meat consumption. To address this we believe that action should not only be taken to educate the consumer but to implement policies which support producers and processors of quality Scottish food. To this end, we want to see farmers who, for example, produce high quality environmentally friendly beef in High Nature Value areas of Scotland given greater support by the taxpayer than beef producers in other areas which do not provide the same levels of benefits to nature and the Scottish countryside.

**Local and seasonal food.** We recognise that locally produced food and seasonally consumed food can provide health and environmental benefits. Local and seasonal food can also educate consumers about food and how it is produced, benefit the local economy and build resilience into the system. However, local doesn't automatically mean that the food is produced with a low environmental impact or with good food standards. For example, organic food produced in another country without fertiliser can have a lower carbon impact than locally produced non-organic food. Improving the sustainability of production systems would begin to address this sort of issue.

11. **What other steps toward achieving a Good Food Nation would you recommend?** We recommend that the strategy and/or the Food Commission investigates how Scotland can address the need for true cost accounting for food – this is where the true cost of producing food is included in the price paid. A policy of true cost accounting is likely to mean all food would increase in price, however, the public may see reducing costs in other areas such as general taxation or water bills. We recognise that increasing food prices would impact most on those living on low wages or in poverty, who currently can only afford to eat the cheapest food which is often unhealthy and nutritionally poor. The solution here lies in lifting people out of poverty not in keeping food cheap. This requires Government action in areas reaching beyond food policy.

We support the idea put forward by Nourish Scotland for the establishment of a centre of food policy excellence in Scotland, similar to that for carbon.

12. **What else should be considered?** We believe that there was a huge missed opportunity in the recent CAP decisions in Scotland which could have supported the vision for a Good Food Nation. It could have encouraged sustainable food production and reduced the impact of farming on the environment. However, the decisions made have largely not benefited wildlife friendly farming or HNV farmers. This throws into question the ‘join-up’ between two clearly related parts of Government – food and agriculture. Yet for a food strategy to be effective there should be ‘joined up thinking’ across all parts of Government.
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?
RSPB Scotland contains a high level of expertise in marine and land use practice and policy and we continuously seek improvements in these areas. Over the next 12 months we will be seeking, for example, to:

- Ensure implementation of the Scotland Rural Development fund that maximises environmental benefit from this small pot of money and promotes more sustainable farming practices;
- Ensure effective implementation of the reformed CFP, including the Landings Obligation and supporting sustainable fishing businesses;
- Ensure there is improved monitoring of the Farming for a Better Climate Programme so that there can be proper evaluation of uptake of FFBC recommended measures by farmers and attribution of carbon savings where these have been made;
- Get early implementation of the current Government proposal for all farmers to introduce Fertiliser Efficiency Measures – currently a proposal in the RPP2 (Scotland’s climate change action plan);
- Further develop our ideas on sustainable food and farming in Scotland, identifying what changes are needed and share these.

RSPB Scotland will also seek to further develop its partnerships with other organisations with expertise in different areas of the food system, culturing working relationships and sharing expertise. This will build on existing cooperation with for example seafood processors.

14. How did you hear about this Discussion Document?
Number of sources including Scottish Government e-updates.

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RSPB Scotland is part of the Royal Society for the Protection of Birds, the UK-wide charity which speaks out for birds and wildlife, tackling the problems that threaten our environment. Nature is amazing - help us keep it that way