CONSULTATION QUESTIONS

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

There are clear benefits to placing food at the centre of a range of complementary public policies, and the aspiration set out in the Executive Summary.

However, there is an apparent mismatch between what is viewed as becoming a Good Food Nation and what is planned in the discussion document. The former encompasses the full supply and utilization chain from production, processing, procurement and consumer consumption, whilst large aspects of the document for discussion are focussed on delivering on the aspirations of public health policy. In updating Scotland’s Food and Drink to cover a broader range of public benefits, there is a loss of focus about food and drink per se. This risks conveying a mixed message regarding purpose in light of the establishment of a new public body, Food Standards Scotland, which will have a remit for food and health in line with that of the legacy body, Food Standards Agency in Scotland.

The aim of being a Good Food Nation is welcomed but the changes in emphasis should more explicitly encourage innovation, production and supply chains. There is very little in terms of innovation as a way of delivering the many aspirations for nutritional sustainability. For example, ‘reformulation’ is a way of enhancing poor raw materials into new products. Innovation of the raw materials (crops, livestock etc.) will deliver sustainable “Good Food” that requires significantly less process chain enhancement, and so leading to the optimization of supply chains (i.e. costs/energy savings and reduced waste), whilst ensuring that the finished product has an enhanced quality (nutrition, taste, supply chain resilience etc.).

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

Under the remit of this refreshed policy, the primary success would be the reduction of degenerative diseases. A public policy on food and drink should go significantly beyond this to encompass innovation in food and drink, economic development, and sustainability. Metrics to be assessed could be as follows:

- company expansion/tturnover and, importantly, profit
- product range expansion
- new and expanded markets
- increased utilization and diversification of home grown resources (crops, livestock etc.)
- increased national consumption compared to exports (in nutrition and non-nutrition targeted products), but increased absolute levels of both
- a healthier population (although it may be hard to prove successful delivery by the 2025 time horizon, independent of other health initiatives [smoking, exercise etc.]).
Success would be a food and drink industry that has increased consumption in Scotland, and a sustainable increase in export markets, using a greater proportion of nationally-sourced raw materials and with a vibrant innovation pathway to ensure product evolution.

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

The significant swing towards public health through food and drink is understandable and valuable. However, whilst there are already very prominent and active players in this area (e.g. the new Scotland food body, NHS Health Scotland et al.), this shift in emphasis risks creating some confusion to the sector, and slowing delivery of activities set in motion by the first food and drink policy, namely sustainable economic development of the food and drink industry. Some issues associated with Scottish public health, and poor or skewed food consumption can benefit by upgrading the raw materials at source, e.g. more nutritious crops, livestock, shellfish etc. An across-the-board sustainable upgrading of raw material quality would mean that even formerly low-grade food can be improved in terms of its nutrition. Allied with the new/refreshed policy, the new Food Standards Scotland, together with other organisations (e.g. NHS Health Scotland and local authorities) should be able to deliver to national health and economic aspirations.

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

N/A

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

There should be a broader consultation with industry (channelled through Scotland Food and Drink) and with innovation providers (i.e. industry, research institutes and HEIs) to enable an aspirational food and drink policy that can be delivered. This would not just be to focus on the end points (here, predominantly national health), but also to involve those who will be required to facilitate delivery.

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

It is unclear where a Food Commission will sit in relation to other groups which advise on “the importance of food and drink to Scotland’s health, environment, economy and quality of life”. For example, the proposed new Food Standards Scotland, Scotland Food and Drink Ltd., NHS Health Scotland food and health initiatives all (or will) operate in this area.

The remit of a Food Commission is proposed to include advising on broad spending priorities, including the Scottish Government Strategic Research Programme (SRP). The SRP currently underpins, via funding leverage, significant long-term ongoing initiatives with national and international food and drink industries, and Scotland’s innovation pipeline in the food and drink...
sector. However, no reference is made as to how the Food Commission would relate to other groups which advice on the SRP, notably CAMERAS.

It would be desirable to have its roles clarified, and whether it is an overarching body, and how its role in championing measures complements that of Food and Drink Scotland.

The greatest impact of a Food Commission could be to focus on issues poorly fleshed out under the previous food and drink policy. For example, the role of maintaining and deploying a network of local food champions is significant and will require considerable effort, potentially occupying the commission completely.

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

This has largely been addressed in response to Question 2, but reiterated here. Importantly, the goals set as part of the initial National Food and Drink Policy (sustainable economic development and expansion of the food and drink industry) have largely disappeared. A danger is that without a strong and innovative national food and drink industry, it may be harder to achieve goals relating to human health.

We suggest the following would be robust indicators of a revised food and drink policy:

- company expansion/tturnover and importantly profit
- product range expansion
- new and expanded markets
- increased utilisation and diversification of home grown resources (crops, livestock etc.)
- increased national consumption compared to exports (in nutrition and non-nutrition targeted products), but increased absolute levels of both
- a healthier population (although it may be hard to prove successful delivery by the 2025 time horizon, independent of other health initiatives [smoking, exercise etc.]).

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

This refreshed policy represents a significant change from the original Food and Drink Policy, and been a major focus of attention within the industry. The concept of the Good Food National encompasses “health and wellbeing, environmental sustainability, local economic prosperity, resilient communities, and fairness in the food chain”, and aspects which have been poorly delivered through diet and nutrition policies (e.g. Eating for Health: A Diet Action Plan for Scotland, 1996, Towards a healthier Scotland 1999 etc.).

The new policy is aspirational but is not clear about the measures through which its aims will be achieved. We have concerns about the relatively limited consideration of the food and drink production and innovation bases
in the discussion document, as these will be key players in delivering the vision described.

Extensive reference is made throughout the document to environmental factors (e.g. environmental sustainability). For the food and drink sector, economic aspects of sustainability (which encompass environmental impact and cost) would merit greater relative prominence to reflect the importance of its economic viability in supporting the delivery of the vision of a Good Food Nation. This is an important consideration in the development of approaches to a Good Food Nation since the general improvement of people’s diet may come with associated costs (and potential savings, see 1) across the supply chain. For example, local procurement may be cost effective but may also deliver a nutritionally diminished product. Conversely, investment in innovation to upgrade the basic food and drink feedstock could lead to a broad-scale uplift of nutritional content, quality and supply chain resilience that would benefit local consumers as well as consumers of exports.

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?

In the previous answers we note that the significant shift in this policy away from the food and drink industry per se and towards public diet and nutrition confuses an already busy policy area, and poorly serves all of the aspirations of industries. This represents a significant change in direction from the original policy and fails to recognise and continue to support the industry’s successes and potential to progress and to deliver on the original and new aims.

10. Which other areas would you prioritise?

The policy makes only two references to innovation. Reports from across industry sectors have shown that progress only comes from innovation. Here, innovation can aid at each and every level. This can start at the Scottish Government Strategic Research Programme, in aiding the creation of a modern, sustainable and resilient food and drink feedstock for Scotland’s changing future environment, through to innovation in the supply chain and procurement. Supporting developments in other areas (e.g. environment impact, economic stability and financial innovation), and support for the industry from local government through to national and international levels, allied to existing and new diet and nutrition policies, would also help achieve the desired effects.

11. What other steps toward achieving a Good Food Nation would you recommend?
Organise a workshop comprising representatives from amongst the consultation respondents to provide more specific advice on the refreshed National Food and Drink policy. It is likely that such a workshop would be cross-sectoral, and enable key messages to be identified ahead of final drafting of the policy document.

12. What else should be considered?

There should be some consideration of the means and responsibilities for monitoring measures of success suggested for the policy delivery.

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?

Much of this is covered in the previous answers. The James Hutton Institute, as a Main Research Provider to Scottish Government, delivers on innovation via co-construction with the national (and international) food and drink industries. Consequently, we are very willing to be more involved in the development of the final policy document, and its implementation over the coming year.

14. How did you hear about this Discussion Document?

Refreshing of the previous policy document (National Food and Drink Policy) has been discussed in advance with Food, Drink and Rural Communities in Scottish Government, Scotland Food and Drink Ltd., and actors within the industry sector.