

## Good Food Nation: Proposals for Legislation consultation

### Introduction

Scottish Crofting Federation (SCF) is pleased to see a consultation on proposed legislation for a Good Food Nation and welcomes the opportunity to contribute to this.

SCF is the only organisation dedicated to campaigning for crofters and fighting for the future of crofting. SCF is the largest association of small-scale food producers in the UK. Its mission is to safeguard and promote the rights, livelihoods and culture of crofters and their communities. Working through its membership structure it can respond authoritatively to agencies and government officials at local, national and international levels on the many issues affecting crofting and crofting communities.

SCF is a member of the Scottish Food Coalition and supports the response submitted by the coalition to this consultation. We have therefore adapted this as our template.

We are keen to see fundamental change to secure a socially and environmentally just food system in Scotland. We have for a long time been very supportive of framework legislation to help us achieve the Good Food Nation vision.

SCF's priorities for a new law on food are:

1. Full incorporation of the **right to food** in Scots law;
2. A requirement for a comprehensive **National Food Plan**, which covers the full spectrum of issues related to food, from croft and farm to consumer to waste;
3. Robust **targets** on the face of the bill, including:
  - a. A new agricultural support system by 2024 that is based on increasing sustainable Scottish food production for Scottish consumption and paying public money to support the provision of public goods;
  - b. All workers in the food sector paid at least the living wage and included in collective bargaining agreements by 2025
  - c. Halving of moderate to severe household food insecurity by 2030;
  - d. Halving the environmental impact of the food system, including halving food waste by 2030.
4. **Duties** on public bodies; and,
5. Legislating for an **independent food commission**, with the power and resources to commission research, and oversee policy coherence and progress towards food system goals.

We are encouraged to see some of these reflected in the consultation proposals, but consider it imperative that Scottish Government takes a stronger leadership role, with a much more ambitious approach to this agenda. In this response, we will offer a more general view of the consultation before answering the questions set out in the consultation document.

### Background

SCF has for over 30 years campaigned for a better food system (production to consumption) in Scotland because what we have is not sustainable. This is evidenced by:

- **Rural communities.** Many crofters and smaller-scale farmers across Scotland struggle to make a living. 45% of crofters or farmers in 2017 didn't make enough to pay themselves

minimum agricultural wage, and average farm business income without subsidies is a loss of nearly £15,000<sup>1</sup>.

- **Food sector jobs.** These are often some of the most insecure and poorly paid<sup>2</sup>.
- **Connection to food.** Our ability to grow our own food and buy local food is limited. Local food and growing opportunities need to be better integrated into rural and urban planning to foster better connection to food and shorter supply chains. The food we proudly export around the world is often not available locally in mainstream shops, restaurants and public kitchens. We need to ensure food served in schools, hospitals and other public service catering is fresh, healthy and sustainable.
- **Animal welfare.** The welfare of animals needs to be recognised as part of food quality. An estimated 45% of the antibiotics used in the UK are given to livestock, mainly to those farmed intensively<sup>3</sup>. Intensively farmed animals are often kept in systems that are harmful to their well-being and many are pushed to very fast growth rates or high yields that have a detrimental impact on their health and welfare.
- **Wildlife.** Intensive global food production has been identified as one of the key drivers of habitat loss and wildlife decline<sup>4</sup>. In Scotland, there are continuing declines in farmland birds and in insect populations. Intensification of food production<sup>5</sup> is part of this problem.
- **Climate change.** Around a quarter of Scotland's greenhouse gas emissions come from agriculture, mostly from intensive 'industrialised' agriculture<sup>6</sup>. Further emissions arise from the food sector as a whole, in the processing, sale and waste of food most of which is avoidable<sup>7</sup>. Without both mitigation and resilience measures, this leaves Scotland's food production vulnerable to a changing climate.
- **Food poverty and Public health.** Many households in Scotland cannot afford to eat according to recommended guidelines<sup>8</sup>. 8% of Scottish people are food insecure<sup>9</sup>, and this figure rises within certain groups. Two-thirds of Scottish adults are overweight or obese, one-third being obese (this has not changed substantively in the last 10 years despite SG policy), whilst 1 in 10 people in the UK over the age of 65 are malnourished or at risk of malnutrition<sup>10</sup>.

These multiple related crises point to a failure of the food system. However, the solution to many of these problems is also food: if we can produce, process, market, sell and encourage consumption of food in the right way, with minimal waste, we have the key to solving many of our society's trickiest issues. Indeed, Scottish Government is already committed to solving some of these problems.

---

<sup>1</sup> Scottish Government (2017). Estimates of average Farm Business Income (FBI) 2016-17. Online, Available from: <https://www.gov.scot/Topics/Statistics/Browse/Agriculture-Fisheries/Publications/FBI>

<sup>2</sup> ONS (2013), Annual Survey of Hours and Earnings, available at: <http://www.ons.gov.uk/ons/publications/reference-tables.html?edition=tcm%3A77-328216>

<sup>3</sup> Alliance to save our antibiotics (2015). Antimicrobial resistance - why the irresponsible use of antibiotics in agriculture must stop. Online. Available from: <https://www.ciwf.org.uk/media/7247793/antibiotics-alliance-40pp-report-2015.pdf>

<sup>4</sup> WWF (2018). Living Planet Report 2018. Online. Available from: [https://wwf.panda.org/knowledge\\_hub/all\\_publications/living\\_planet\\_report\\_2018/](https://wwf.panda.org/knowledge_hub/all_publications/living_planet_report_2018/)

<sup>5</sup> 'Intensification' refers to farming methods such as increasing use of pesticides, herbicides and fertilisers which can directly affect wildlife or impact their ability to find food, often leading to declines. More intensive farming methods also refers to the loss of wildlife habitat such as field margins, hedgerows, and overwinter stubble.

<sup>6</sup> Scottish Government (2016). Scottish Greenhouse Gas Emissions 2016. Online. Available from: <https://www.gov.scot/Resource/0053/00536542.pdf>

<sup>7</sup> Zero Waste Scotland. Reduce Food Waste. Online. Available from: <https://www.zerowastescotland.org.uk/Looking-For-Ways-To-Reduce-Food-Waste>

<sup>8</sup> Children and Young Peoples' Commissioner Scotland (2018). Healthy diets "increasingly unaffordable" for 220,000 of Scotland's children, says new research. News article. Available from: <https://www.cypcs.org.uk/news/in-the-news/healthy-diets-increasingly-unaffordable-for-220000-of-scotlands-children-says-new-research-published-today>

<sup>9</sup> Scottish Government (2018). Scottish health survey 2017: volume one - main report. Online. Available from: <https://www.gov.scot/publications/scottish-health-survey-2017-volume-1-main-report/>

<sup>10</sup> Malnutrition Task force (2017). State of the Nation Report: Older people and malnutrition in the UK today. Online. Available from: [http://www.malnutritiontaskforce.org.uk/wp-content/uploads/2017/10/AW-5625-Age-UK-MTF\\_Report.pdf](http://www.malnutritiontaskforce.org.uk/wp-content/uploads/2017/10/AW-5625-Age-UK-MTF_Report.pdf)

## **A Good Food Nation Bill**

We need a Good Food Nation bill to set a holistic framework for a socially and environmentally just food system fit to address 21<sup>st</sup> century challenges. We support the proposal for framework legislation to create necessary new powers, duties and structures to achieve true policy coherence in this area, and believe that secondary legislation will also be needed to focus on particular issues.

Key to the success of this process is:

- **To incorporate the right to food in Scots law.** This is not only one of the most important changes that needs to be made to the Scottish food system, but also an important legislative tool to give weight to the ambition to become a healthy, sustainable food nation. The need to guarantee access to sustainable food for current and future generations adds weight to the intergenerational requirement to look after our food system. There is no question in the consultation about the proposals on the right to food, but we suggest that this should be central to future legislation. The First Minister's Advisory Group on Human Rights Leadership concluded that a bill should include Economic, Social and Cultural Rights, including the right to adequate food. The right to food is a matter of urgency in this parliament, and while the current government is laudably committed to the human rights agenda, there is no guarantee that future governments will be equally supportive.
- **A well-resourced Good Food Nation Team embedded throughout Scottish Government.** This issue is such that it should not be dealt with by one team working in isolation from other overlapping portfolios but rather with them (including agriculture, fisheries, environment, health, business and trade).
- **A clear timeframe for the bill.** There is a lack of clarity in the timetable for the Good Food Nation bill. A bill will need to be tabled by Autumn 2019 at the latest so that there is a full and considered hearing in Parliament as we approach elections in 2021.
- **Clarity of purpose.** The Land Reform (Scotland) Act 2016 is an exemplar of legislation with clarity of purpose, particularly expressed in the preamble. We would strongly favour a bill which is explicit and purposeful in its design to solve interrelated food system problems. For the same reason we believe it is crucial to have **headline targets on the face of the bill.** These guide the policies and proposals put forward in future Statements of Policy, and drive the development of, and give purpose to, secondary legislation.
- **A clear timeframe for duties and powers within the bill.** Like in many recent bills, it is vital to be clear about the timeframe for creating new structures, and for new duties and powers to come into effect. We feel that a 12-month timeframe after the Act is passed would be appropriate.
- **Ambitious public and stakeholder engagement.** There has been limited outreach initiated by Scottish Government to either the public or stakeholders on the potential of a Good Food Nation bill, despite the subject necessitating broad input. Feedback from SCF's network has been that the consultation itself is difficult to understand and engage with. The 'Citizen Space' format doesn't offer the opportunity to add any other thoughts, suggest appropriate additional questions, or approach consultations in a more open-ended way to facilitate true participation. Scottish Government's 'Open Government's Action Plan' was published in January 2019.<sup>11</sup> Commitment 2 in the Action Plan was made in response to feedback that:
  - '[The government] rely too much on formal consultation, and too often at a point where the options have been narrowed or all but fixed.
  - 'Consultation documents are often complicated and long. They are unsuitable for anyone who is not familiar with the arguments, the type of language or the actions involved, and so make many people feel excluded...
  - 'There is not enough support available to make sure a wide range of people can fully take part in things like consultation events and online discussions and that we value their time properly.' (p.15)

It is clear that the Scottish Government's consultation process continues to have some of these pitfalls.

---

<sup>11</sup> Scottish Government (2018). Scotland's Open Government Action Plan: 2018-2020. Online. Available from: <https://www.gov.scot/publications/scotlands-open-government-action-plan-2018-20/>

**Q1 - To what extent do you agree with the framework proposals for Ministers and public authorities to prepare statements of policy, have regard to them in the exercise of relevant functions, and report on implementation, with regard to international obligations and guidance?**

SCF **agrees** with the proposal for Ministers and public authorities to prepare statements of policy, and report on implementation.

**On the statement and the duties on Scottish Ministers:**

We welcome the duty to produce a statement of food policy, but emphasise that this should take the form of a plan with policies and practices, measurable indicators, monitoring in place to facilitate progress reporting, and which identifies resources needed to deliver.

Any enabling legislation for the statement/plan should include a clear timeline for when the statement/plan should be brought forward. We suggest a 6 or 12 month timeframe would be reasonable, and that indicators and measures of success, as proposed in the consultation document, would also need to be identified within the same timeframe.

We agree that a reporting cycle of 2 years and a revision cycle of 5 years is reasonable, and that reports should be produced with regard to progress against the targets set out in the bill and the statement/plan, in addition to our international obligations and guidance. However, we strongly feel that each new revision must be laid before Parliament for scrutiny and approval, rather than simply for information. Being that the statement/plan must be cross-cutting, has cross-party backing, and is part of a shift in governance and policy making to prioritise policy coherence, we believe that this level of scrutiny is crucial.

Any enabling legislation should set out what the statement/plan must include. We strongly feel that the statement/plan should:

- address issues in each of the outcome categories of the National Performance Framework. We are pleased to see a well-rounded list of issues to cover suggested in the consultation document, but feel that it would be helpful and contribute to policy coherence to align with the NPF framework. Within this framework, we would like to see issues related to production (environmental impact, animal welfare, fairness for crofters, farmers and fishermen, parity for women, our global food footprint, access to growing space etc.), processing (short supply chains and supporting local and rural economies, workers' rights, animal welfare, environmental impacts, etc.), sale (promoting healthy food environments, workers' rights, sustainability etc.), consumption (healthy and sustainable choices, food insecurity and accessibility of food, etc.) and waste;
- have clear targets on the face of the bill, as outlined above;
- outline clear steps for how we address each of the targets on the face of the bill, identify what secondary legislation or regulatory requirements are needed to deliver on the targets, and metrics for measuring progress towards the targets;
- indicate how an impact assessment will be carried out, with the aim of assessing how policies and proposals impact the goals of the bill and the targets set out. In addition, an impact assessment should take a global perspective, assessing the ramifications on Scottish policies of any trade deals that the UK Government proposes, and our position in a globalised food system;
- seek continual enhancement and progress in all areas of the food system.

Ministers and local authorities, in exercising any functions relating to Good Food Nation Policy or the food system and its impacts, must do so in a manner that 'achieves the objectives' set out in the Good Food Nation bill, the statement/plan and the NPF. We feel that in order for framework legislation to be effective, ministers and public authorities must be required to do more than 'have regard to' the statement/plan.

The government should consult on the content of the statement/plan. We are pleased to see this provision already in the consultation proposals.

We agree that the plan/statement should cohere with international obligations and guidance, but feel that clarity and commitment needs to be strengthened. Both the framework legislation, and the statement/plan should:

- outline how it contributes to delivery of international commitments<sup>12</sup>, including the Sustainable Development Goals (of which a number refer to the food system, including production, consumption, health, food access and so on) which many sectors can contribute to achieving. The statement/plan should also be developed in line with the EU Environmental Principles of precaution, prevention, rectification at source and polluter pays, which Scottish Government reaffirmed its commitment to maintaining in the concurrent Principles and Governance consultation;
- require ministers and public authorities to *comply* with international obligations and domestic commitments. To 'have regard to relevant international obligations and guidance' alone is not strong enough and is already a requirement of signing up to the international commitment. We ask that this is strengthened such that Ministers must comply with their established food commitment. We appreciate that this may take time to build up to, and would therefore favour the 'sunrise clause' proposed in the report from the First Ministers Advisory Group on Human Rights Leadership that ministers must 'have regard to' such requirements for e.g. the first five years, after which time there is a requirement 'to comply with' them<sup>13</sup>.

### **On the duties for specified public authorities:**

We agree that it would be helpful for public authorities to produce their own food plans, with the aim of outlining their contribution to the aims and ambitions of the Good Food Nation legislation and the national statement/plan. However, we would like to see greater clarity on the resources available to them to take on this additional piece of work.

The consultation document states reasonable points which public authorities' plans must include. We also suggest that these should cohere with and cover the same topics that a statement of policy or national plan must cover. Recent experiences with e.g. Local Authority Food Growing Strategies has shown that there is little coordination and sharing experiences. We would like to see guidance included in the legislation, ensuring that each public authority plan takes a comprehensive view of the food system, and providing clarity on the purpose of the food plans.

Public procurement should be included as a specific duty on ministers and public bodies. The way that public kitchens serve food should set an example for others to follow, serving food that is healthy, sustainable and delicious. Public kitchens should look to serve menus that reflect sustainable and healthy dietary guidelines and support local food economies, with little processed food, less but better meat and dairy, more vegetables and whole grains, seasonal, locally sourced produce, and so on. Other countries, for example Denmark, have successfully done this, and this can be done in a cost neutral way that supports environmental and social objectives. Several councils across Scotland have been trialling better procurement policies. In addition, specifically emphasising short supply chains can have a beneficial impact on the local economy<sup>14</sup>.

---

<sup>12</sup> UN Convention on Economic, Social and Cultural Rights and in particular on the right to food; the Paris Agreement on climate change; the Convention on Biological Diversity and its Aichi Targets; Article 55 of the UN Convention on the Law of the Sea; international animal welfare standards such as the standards of the World Organisation for Animal Health; Article 13 of the Treaty for the EU (which should be maintained in full should Scotland leave the EU) and the UN Decade of Action on Nutrition 2016-2025, among others.

<sup>13</sup> First Minister's Advisory Group on Human Rights Leadership (2018). Recommendations for a new human rights framework to improve people's lives. Report to the First Minister. December 10, 2018. Available from: <http://humanrightsleadership.scot/wp-content/uploads/2018/12/First-Ministers-Advisory-Group-on-Human-Rights-Leadership-Final-report-for-publication.pdf>

<sup>14</sup> A recent EU-funded research project showed that from a set of case studies in the UK, Croatia, Italy, Serbia, and Greece, where public procurement contracts have criteria related to local sourcing placing a greater emphasis on retaining as much of the school food budget within their local region (including staff costs), the local economic multiplier can be much higher; in the most beneficial case study, for every €1.00 spent from a school meals budget, an additional €1.46 was generated for the local economy. This is compared to a ratio of 1:0.59 for the case study with the greatest focus on lowest cost procurement where no local sourcing was specified.

**On the duties on Scottish Ministers and public authorities:**

We will elaborate more on this in question 2, but do not think it realistic to simply ask Scottish Ministers and public bodies to collaborate to ensure a joined-up approach, without setting up structures and processes which allow them to do this, and place a statutory requirement on how this will function.

The plan should specify how ministers and public authorities will collaborate on the development of policies that touch on the food system. This should be done with the help of an independent food commission.

***Q2 -Whilst we do not plan to require all sectors to prepare statements of policy on food, they do all have a role to play in achieving our Good Food Nation ambition. To what extent do you agree that Government should encourage and enable businesses in particular to play their part?***

SCF **agrees** that Government should encourage and enable businesses to play their part, including the whole spectrum of private enterprises involved in the food system, from crofts, farms and fisheries, to processors, retailers, social enterprises, hospitality, catering and waste management.

The Good Food Nation bill and subsequent targeted legislation should drive changes to incentives, regulation and other government-controlled mechanisms to allow businesses to play their part in achieving the four headline targets identified above and the wider Good Food Nation vision. For example, a Good Food Nation bill should drive changes to rural policy and funding to ensure that support for food production and related land use and agricultural activities enable the transition to a Good Food Nation. Any public incentives should reward actions above and beyond regulatory baselines and support continual progress towards the headline targets. A subsidy system which supports the best practices in fair, green and healthy food production & processing is good for the environment, health, animal welfare and rural communities. This is one of many examples, and any other incentives paid to businesses involved in the production, processing, sale or waste of food should not be directly or indirectly subsidising movement away from the goals of a Good Food Nation.

In a Good Food Nation, short supply chains should be a priority, to give the best chance for social, environmental and local economic benefits to be delivered. The proposed Scottish National Investment Bank should have in its remit a requirement to support those businesses which contribute most to becoming a Good Food Nation, and which have the most positive impact on communities across Scotland and on the environment.

In particular, Scotland has the opportunity to harness the innovation and development potential of becoming a Good Food Nation. At a time when food and food issues are increasingly in the spotlight, the Good Food Nation bill and agenda has the potential for Scottish Government to create the conditions for, and invest proactively in, Scotland being at the forefront of innovation to solve food system problems.

In general, Government business and trade policy must be aligned with the Good Food Nation objectives. In addition to incentives and advice, this may also require progressive moves toward regulation in the future. For example, it may be necessary to have secondary legislation requiring businesses to pay a living wage, or create a level playing field in procurement in promoting health or environmental outcomes, or the highest standards of animal welfare. This would not be unlike the existing regulations on businesses, for example the continually enhancing food waste regulations.

Scotland is a country rich in natural resources and with a strong food tradition, but there remains substantial scope for increasing the economic impact of the food system; this will have a disproportionately beneficial impact on parts of Scotland such as rural and remote rural areas.

**Q3 - To what extent do you agree with the proposed approach to accountability of Scottish Ministers and specified public authorities?**

SCF **disagrees** with the proposed approach to accountability of Scottish Ministers and specified public authorities, and therefore remain of the view that an independent Food Commission must be established.

We feel that transparency, accountability, and compliance can only be achieved with the oversight of an independent, statutory body. While the consultation document suggests that this is not a situation that warrants establishing such a body, we disagree. The complexity, need for cross-government approach and the cross-societal implications are unprecedented, as are the number of interrelated crises that food system change will tackle.

Successive global reports are underscoring the environmental and public health crisis and the central role that the food system plays. The IPCC report in 2018 argued that any transition pathway to limit global warming to 1.5 degrees Celsius would include changes in land use<sup>15</sup>; with food production being our greatest land use, this will undoubtedly have an impact on food systems. Moreover, successive reports detailing the scale of insect declines report strong links to the food system<sup>16</sup>. Those repercussions will be most apparent in the food system itself and in global food security.

At the same time, the UK is facing ongoing animal welfare issues, rising food insecurity and use of food banks, high inequality in the food system and diet-related ill-health, with many unable to earn a decent living, from crofters and farmers to workers in the food system.

***This is an exceptional situation that requires exceptional solutions.***

The most recent report from the International Panel of Experts on Sustainable Food Systems advocates for a common good food policy for the European Union, which gives considerable support to the cross-cutting approach we are aiming for in Scotland with the Good Food Nation agenda. In shifting focus from agriculture, to food, the report argues:

*"it will pave the way for powerful alliances to be built between all of those with an interest in moving away from the current low-cost, high-externality model, and making it pay to produce healthy, sustainable food. This includes farmers, sustainable food businesses, consumer and health groups, development and anti-poverty campaigners, environmental agencies, school officials, locally-based civil society movements, and policymakers seeking to resolve complex and costly problems at various levels of governance."*<sup>17</sup>

Such cross-cutting collaboration, oversight and coordination can only be delivered with a body that is able to work above and across existing organisations and structures. The success of the Good Food Nation agenda hinges on achieving policy coherence.

We have not been encouraged by the level of cross-portfolio engagement or awareness of this cross-cutting agenda in different sectors, nor with the engagement with civil society, or the transparency of the development of the Good Food Nation consultation and wider agenda. To enable Parliament to scrutinise future statements/plans and progress effectively, and to carry

---

<sup>15</sup> Intergovernmental Panel on Climate Change (2018). Global Warming of 1.5°C. Summary for Policymakers. Online. Available from: [https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15\\_SPM\\_version\\_stand\\_alone\\_LR.pdf](https://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15_SPM_version_stand_alone_LR.pdf)

<sup>16</sup> "The conclusion is clear: unless we change our ways of producing food, insects as a whole will go down the path of extinction in a few decades" (Dudley et al., 2017; Fischer et al., 2008; Gomiero et al., 2011). "The repercussions this will have for the planet's ecosystems are catastrophic to say the least" Sanchez-Bayo, F. Wyckhuys, K.A.G. (2019). Worldwide decline of the entomofauna: A review of its drivers. 232: April 2019. P.22 Available from: <https://reader.elsevier.com/reader/sd/pii/S0006320718313636?token=3F66107701B6031622ACC0032A4EA60AB0801C57D51B6C98ADE97A18B423FCDF83E78E281DA5316CA1AF58DC95D9B370>

<sup>17</sup> De Schutter, O., et al. (2019). Towards a Common Food Policy for the European Union: The Policy Reform and Realignment that is Required to Build Sustainable Food Systems in Europe. IPES-Food. Available from: [http://www.ipes-food.org/\\_img/upload/files/CFP\\_FullReport.pdf](http://www.ipes-food.org/_img/upload/files/CFP_FullReport.pdf)

out democratic, participatory functions, we need a body to collate information in a systematic way and provide clear, evidence-based recommendations. A statutory food commission can perform these functions with a secretariat, staff and financial resources.

**What should a statutory food commission look like?**

A Food Commission should include a number of commissioners with experience across the sectors, taking into account the perspectives of businesses (from production to consumption), workers, citizens, the environment, livestock, etc. The process for appointing commissioners should be transparent.

A Food Commission would have the power to commission research and make recommendations based on evidence and current progress towards targets. Framework legislation should grant these powers and also place a duty on ministers to motivate why they have or have not taken on board the Commission's recommendations.

A statutory food commission should have a clear and transparent process for engaging with civil society networks. A good example is the Agriculture and Rural Development stakeholder group, which provides a communications route between stakeholders and Scottish Government.

The Land Commission is a useful model for a Food Commission which has taken a very active role in pushing forward a progressive agenda, commissioning research, engaging with stakeholders, hosting public meetings and roadshows. This is an excellent example of positive action from Scottish Government to create a cross-cutting, participatory governance body.

**Q4 - To what extent do you agree with the proposal for targeted legislation relevant to specific policy areas as an alternative to a single piece of legislation?**

SCF **disagrees** with the proposal for targeted legislation as an alternative to a single piece of legislation.

We believe a cross-cutting framework bill is essential and the most effective and coherent way of delivering a Good Food Nation. Part of the reason we have failed to realise best outcomes for many parts of our food system is that they are currently working in competition and not in unison. We see this as a massive opportunity to resolve this. We acknowledge that framework legislation may not deliver everything, but we need to use it to recognise and create the conditions necessary to deliver change across the whole food system<sup>18</sup>.

We do agree that secondary or targeted legislation will be necessary, but they will be driven by the overall ambition and headline targets set by a Good Food Nation bill. It is not clear from the consultation document which policy areas Scottish Government think that we need targeted legislation for, so current proposals do not contain enough detail to reach a conclusion. We feel that this needs to be subject to an assessment across the food system and to be driven by the overall goals of a Good Food Nation bill. Part of the role of the Food Commission would be to support alignment of targeted legislation with a framework bill.

---

<sup>18</sup> "Food systems could combine the goals related to diet-related health, environment and economy if they involved farmers, entrepreneurs, small- and medium-sized enterprises and big businesses generating jobs and creating equitably-shared wealth for themselves and local and national economies by producing, distributing, trading, processing, marketing and selling nutritious foods aligned with dietary guidelines to European citizens at affordable prices, using a skilled and decently paid workforce and environmentally-sustainable methods and processes that protect biodiversity, water, soils and air and minimize environmental health risks, food waste and greenhouse gas emissions, with high standards of animal welfare." Hawkes, C. and Parsons, K. (2019) Policy Brief 31. Connecting food systems for co-benefits: How can food systems combine diet-related health with environmental and economic policy goals? World Health Organization Regional Office for Europe, Geneva. Available at: [http://www.euro.who.int/data/assets/pdf\\_file/0007/387070/policy-brief-31-austria-eng.pdf?ua=1](http://www.euro.who.int/data/assets/pdf_file/0007/387070/policy-brief-31-austria-eng.pdf?ua=1)