

Response to the national Good Food Nation Plan consultation

The national Good Food Nation Plan demonstrates the wide range of excising policy areas that relate to Scotland's food system. Achieving policy coherence at such scale is an ambitious endeavour, however the Plan does not set out concrete proposals for how that may be approached. The omission of specific to the Plan targets and milestones is a missed opportunity to set out what success would look like, making it difficult for relevant authorities to create impactful policy. The lack of clarity regarding potential investment for the implementation of the national and local Good Food Nation Plans creates further uncertainty in the level of commitment from Scottish Government to achieving the proposed Outcomes in the Plan.

The Plan calls for embarking on a process of food system transformation; however, it does not provide a national overview of the current key challenges that lie in the way of that process, how these are distributed geographically nor make recommendations of how these challenges may be tackled. This makes it very difficult for stakeholders and delivery partners such as relevant authorities to identify key priorities for action and target limited resources accordingly. The Plan could be strengthened by highlighting priority areas for action and clarifying where immediate, medium term or long-term attention is required.

Outcomes 1, 2 and 4 suggest that food consumed in Scotland should be accessible and affordable, healthy/nutritious, is produced in a way that does not harm the environment, that improves biodiversity outcomes, and that supports the country's Net Zero emissions. In addition, food choices by individuals and organisations tasked with public procurement should also support the local food economy that is underpinned by fair work principles.

This signals a priority to ensure food in a Good Food Nation Scotland does "all of the above". However, this is not stated clearly and there is little recognition of current baselines to allow the measuring of progress. Much needed proposals for how to approach such a huge challenge that intersects climate, economic and social policy are also missing from the proposed Plan.

According to this [National Good Food Plan document](#) relevant authorities must have regard to the content of the national Good Food Nation Plan and it can provide direction and guidance to relevant authorities in creating their own Plans while also having regard for their local contexts.

Although the Good Food Nation (Scotland) Act 2022 places a new statutory duty on relevant authorities to produce, deliver, monitor, and review their own Plans on a regular basis there has not been a commitment to further investment to support authorities to take the systems approach to food-related issues implicit in the draft national Good Food Nation Plan. We trust that providing good quality advice, expertise and support would be considered in the process of setting the remit for the new Scottish Food Commission. It is important to ensure the Commission is in place in time to assist relevant authorities in the creation of SMART local Good Food Nation Plans.

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Beyond the scope of this public consultation, further discussions with Government would be welcome to explore co-delivering the change. Multiple issues relating to the interaction of national and local policy and context in relation to the food remain to be resolved. For example, what would be the interaction between local Good Food Nation and existing policies directly relating to the food system such as Food Growing Strategies; or between the local Good Food Nation Plan and other existing non statutory food plans, such as the Glasgow City Food Plan which was co-created by a range of stakeholders over a long period of time and has gathered momentum and engagement. The impact on existing efforts to tackle food-related issues has to be taken into consideration in the preparation of Good Food Plans locally but also nationally.