

# Glasgow Centre for Population Health

## Response to the Good Food Nation Bill Consultation 2019

March 2019

### Introduction

The Glasgow Centre for Population Health (GCPH) was established in 2004 to generate insights and evidence, support new approaches and inform and influence action to improve health and tackle inequality. ‘Sustainable, inclusive places’ – one of the Centre’s four work programmes – aims to support processes of change to help Glasgow become a more inclusive, resilient and sustainable city.

The GCPH’s work is focused on Glasgow, with wider relevance across Scotland, and has a particular focus on poverty as a key determinant of a range of health and social outcomes (including poor diet and obesity). Since its inception, the GCPH has recognised the importance of food, food poverty and the food environment in looking at wider population health and has undertaken a range of related research and learning projects. We recognise that our food system needs to become fairer, healthier and more sustainable if we are to tackle some of today’s social, economic, environmental and public health problems, including diet-related ill health, obesity and inequalities in such diseases. We also recognise the related public health challenge of food insecurity, which is growing for vulnerable individuals and families as a result of increasing levels of economic hardship. This area of work is reflected in the new Scottish Public Health Priority 6: A Scotland where we eat well, have a healthy weight and are physically active<sup>1</sup>.

The GCPH hosts and supports the Glasgow Food Policy Partnership (GFPP) which is a group of public, private and voluntary sector organisations who share an ambition to make the food system in Glasgow fairer, healthier, more sustainable and resilient. The partnership seeks to share information across sectors, inform policy and strategy, promote collaboration and stimulate action towards this vision.

The GFPP defines ‘good food’ as food that is:

*“vital to the quality of people’s lives in Glasgow. As well as being tasty, healthy, accessible and affordable, our food should be good for the planet, good for workers, good for local businesses and good for animal welfare.”*

The GFPP, which represents Glasgow in the [Sustainable Food Cities Network](#), is working at a strategic level with local partners to help strengthen and bring coherence to our work to make good, nutritious food more available and accessible

to everyone. This includes joining up and improving our approaches to food poverty and insecurity; health and wellbeing; the local food economy; food growing; reducing waste; and food procurement. We also support Glasgow City Council with its work, outlined in its current Council Plan, to become a sustainable food city<sup>2</sup>.

We welcome this consultation and would very much like to see a national legal framework that supports and enables an holistic approach to food in Scotland that recognises the importance of food for health, for the economy and for the environment. However, we would have liked to have seen more detail and ambition in the consultation document. In particular, we believe that the following will be needed in a Good Food Bill:

- A more specific definition of 'good food' and the targets that we could and should be working towards.
- A commitment to the right to food being enshrined in Scots law.
- A clear recognition of the central importance of our food system to protecting and improving our environment, our food security and our health, and the responsibilities of the Government and others to ensuring the right to food is respected, protected and fulfilled.

Our answers to the four specific questions in the consultation are below.

**1. 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 that exercise of relevant functions, and report on implementation, with regard to international obligations and guidance?**

We strongly agree.

We would like to see a commitment from the Government to a new Bill on food policy which informs and shapes the relevant policy areas across the Government, that recognises and enshrines the right to food in law, that lays out the duties of public bodies and the role of business, and that declares a clear process for monitoring and accountability. This food policy should cover the whole food system, including land use, growing, harvesting, animal welfare, processing, procurement, marketing, selling, preparing, cooking, and eating food, and reducing and disposing of food-related waste (including food packaging) and should be coherent with the environmental and social justice agendas that are vital for future wellbeing. It must also include a commitment to increasing access to good, high quality, nutritious food, particularly for those on low incomes, and to increasing the focus on health, sustainability and the local economy in the way that food is procured, prepared, and served by the public sector. It should also consider the related issues of worker's rights, environmental impacts and land use within the food sector.

As an overarching policy, it should be simple: enabling and facilitating rather than being prescriptive and restrictive. It should go beyond a single issue plan, but should provide a framework that enables a coherent, consistent and strategic cross-governmental approach to policy and practice on all aspects of the food system. More specific policies on specific issues or in related fields, which are informed and shaped by this overarching framework, should follow, adding detail about what should be done and by whom. All policies must clearly lay out how progress will be monitored and reported on, and should build in regular review to allow new evidence to be assimilated. Further, it should be clear how the public can contribute to the development and revision of the policy.

We also feel that Local Authorities have an important role to play and that they should be required and enabled to have their own policies on food. Some Councils in Scotland already have formal food policies, and others, like Glasgow City Council, are working towards this.

**2. While we do not plan to require all sectors to prepare statements or 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?**

We strongly agree. However, we would like to see this going beyond voluntary codes. It should build in incentives or support for those businesses that engage with the vision and work towards the GFN priorities, and rules that discourage business decisions that do not work towards the GFN goals. We would also like to see greater support to enable locally produced food to be procured by the public sector in order to maximise the benefit of the investment in food for the local economy.

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

We strongly disagree.

The Good Food Nation addresses hugely important issues for our future in terms of our health, our environment, and our food security: it is vital that we make progress on the numerous policy agendas relating to food, including food poverty and the right to food, sustainable food production, and healthy and sustainable diets in a coherent way. The food system is complex and cuts across many parts of Government and many different organisations have vested interests which means there is a risk of real or perceived influence or corruption in the political system. As a result we believe that it is vital that a robust system for monitoring progress is put in place that provides independent scrutiny and transparency.

We therefore believe that an independent statutory body is required to which the Government and other public agencies should report on their progress in delivering their food plans. This should be made up of experts and representatives from across the food system who understand the rationale for, and the evidence supporting, the environmental, health and economic priorities laid out in the Good Food Plan.

Other important laws have included setting up independent statutory bodies to monitor progress on commitments and we believe that food policy requires the same approach.

#### **4. 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?**

We strongly disagree.

We believe that **both** framework legislation and targeted legislation are required.

Framework legislation should provide an umbrella that brings different aspects of the food system together. Going forward it should ensure that our national approach to food is coherent and that we move forward on all issues that influence the food system working towards the same priorities. Framework legislation cannot go into the detail required for each aspect of the food system and so targeted legislation, when it is developed or revised, should reflect the framework but provide further detail and clarity on how the priorities will be realised for that particular part of the food system.

#### **Final comments**

Despite investment over many years in action to address our stubbornly poor diet-related health trends, there has been little progress in the proportion of Scots who are able to maintain a healthy weight or who can afford an adequate and nutritious diet for their families. At the same time, as a nation, we continue to see huge amounts of surplus food being discarded. Direct greenhouse gas emissions from the UK food system make up about 20% of the currently estimated consumption emissions<sup>3</sup> which accelerate the climate change that will threaten our future food security. Public and media concern is growing about the impact of our food production and consumption patterns on food safety, for example microplastic and pesticide contamination in the food chain, and on the environment more widely. At the same we spend public money on food which could be procured locally and sustainably to the benefit of the local economy and the environment. We believe that our food system needs to change urgently to improve public health, the environment and the economy and that the Good Food Nation Bill is a vital step towards this.

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<sup>1</sup> Scottish Government. *Public Health Priorities*. Available at: <https://publichealthreform.scot/the-reform-programme/scotlands-public-health-priorities>. Accessed: 7/1/18.

<sup>2</sup> Glasgow City Council. *Strategic Plan 2017-2022*. Glasgow: Glasgow City Council; 2017. Available at: <https://www.glasgow.gov.uk/CHttpHandler.ashx?id=40052&p=0> (commitment number 72). Accessed: 7/1/19.

<sup>3</sup> Audsley E, Brander M, Chatterton J, Murphy-Bokern D, Webster C, Williams A. (2009). *How low can we go? An assessment of greenhouse gas emissions from the UK food system and the scope to reduce them by 2050*. FCRN-WWF-UK. Available at: [http://assets.wwf.org.uk/downloads/how\\_low\\_report\\_1.pdf](http://assets.wwf.org.uk/downloads/how_low_report_1.pdf). Accessed: 18/3/19