

## Response to Good Food Nation proposals for Legislation by the Scottish Environment LINK Food and Farming Subgroup

Date: 17 April 2019



### Introduction

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 35 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. LINK members welcome the opportunity to comment on this consultation.

Scottish Environment LINK members believe that a healthy environment is fundamental to the realisation of ambitions for a Good Food Nation.

**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.**

Scottish Environment LINK agrees with the framework proposals and welcomes the proposal for framework legislation for a Good Food Nation.

However, it is not clear from the proposal what action will be taken from an environmental point of view. A Good Food Nation is reliant on a healthy environment, and central to the goal of becoming a Good Food Nation is to align the food system with the principles of a circular economy. These can be summarized as follows: 'A circular economy is one that is restorative and regenerative by design...It entails gradually decoupling economic activity from the consumption of finite resources, and designing waste out of the system. Underpinned by a transition to renewable energy sources, the circular model builds economic, natural, and social capital. It is based on three principles:

- 'Design out waste and pollution
- 'Keep products and materials in use
- 'Regenerate natural systems'<sup>1</sup>

As such, the policy statement must reflect the wide range of opportunities and environmental impacts that come from food production and consumption and look at the food through a systemic lens.

As a coalition of environmental NGOs we are focusing on impacts, and support a strong environmental target on the face of any future legislation for a Good Food Nation. We agree with the Scottish Food Coalition's suggested target to 'halve the environmental impact of food'. We expect any policy

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<sup>1</sup> Ellen Macarthur Foundation. Concept: What is a Circular Economy. Online. Available from: <https://www.ellenmacarthurfoundation.org/circular-economy/concept>

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statement to include robust measures to achieve this goal that consider the full food system, from production, to processing, packaging, transport, and waste, with specific targets and a suite of indicators which reflect the polluting and damaging aspects of food on the environment.

### Why is becoming a Good Food Nation important for the environment?

With the food system being one of the biggest ways that humans impact the environment, we stress that addressing this is of critical importance. The impact can be summarised as follows:

- Food production and consumption are key pressures on biodiversity globally. Of all extinct plant, amphibian, reptile, bird, and mammal species since 1500AD 75% were harmed by overexploitation or agricultural activity or both.<sup>2</sup> Globally, the majority of deforestation occurs as a result of conversion to agricultural land.<sup>3</sup> These activities are in turn driven by human consumption.
- In Scotland, agriculture is the predominant land use, accounting for 70% of Scotland's land. In Scottish Government's own review of CAP Greening, on the 35% of Scottish agricultural land used for arable cropping and improved grasslands<sup>4</sup>:
  - 'Lochs and rivers are predominantly in moderate condition with some poor...Agricultural nutrient, livestock and soil management, and the resultant diffuse pollution, is identified as one of the key pressures on water quality'.
  - 'The more intensively managed land has more artificial fertilisers applied, more land is ploughed on an annual basis and livestock production is more intensive; these activities all release GHGs to the atmosphere.'
  - 'Farmland biodiversity has shown serious declines in habitat diversity and species numbers; many of these changes are a result of changes in arable and grassland management including the use of pesticides, change from spring to autumn sown cereals, timing of grass cutting, loss of diversity of crops and the overall frequency of agricultural operations.'
- Inefficient management of nitrogen on farms is a major source of air and water pollution; 48% of nitrogen fertiliser, slurry and manure in Scotland is not taken up by crops or grass. This surplus either runs off into watercourses or is emitted as nitrous oxide, a potent greenhouse gas, or ammonia (NH<sub>3</sub>), which harms public health and wild plants.<sup>5</sup> Excess nitrogen in the air

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<sup>2</sup> WWF. 2018. Living Planet Report - 2018: Aiming Higher. Grooten, M. and Almond, R.E.A.(Eds). WWF, Gland, Switzerland. p.28. 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>3</sup> WWF. 2018. Living Planet Report - 2018: Aiming Higher. Grooten, M. and Almond, R.E.A.(Eds). WWF, Gland, Switzerland. p.37. 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/)

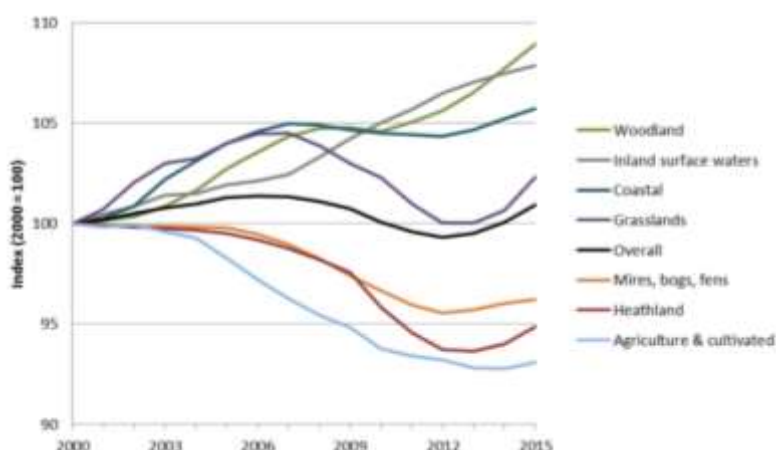
<sup>4</sup> Matthews, K., Miller, D., Towers, W., Squire, G., Hawes, C., Pakeman, R., Brooker, R., Brown, I., Owen, J., Vinten, A., Macleod, K., Wardell-Johnson, D. (2017). CAP Greening Review – Summary. Report by James Hutton Institute. p.2 Available from: <https://www2.gov.scot/Resource/0052/00523863.pdf>

<sup>5</sup> Defra 2017, unpublished statistics for Scotland forming part of Soil Nutrient Balances UK, 2017 <https://www.gov.uk/government/statistics/uk-and-england-soil-nutrient-balances-2017> in <http://www.scotlink.org/wp/files/documents/RSPB-Scotland-Balancing-Act-report.pdf>; <https://www.plantlife.org.uk/uk/our-work/policy/nitrogen>

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and water causes eutrophication and other changes to freshwater and terrestrial ecosystems, with severe impacts on biodiversity and the nitrogen cycle (see below).

- The most recent report by the Intergovernmental Panel on Climate Change (IPCC) warns that in order to limit global warming to 1.5 degrees Celsius significant changes in the way land is used must be made<sup>6</sup>. The report also highlights the importance of reducing more than just carbon dioxide. Limiting global warming will require a 35% reduction in methane by 2050, relative to 2010, and significant reductions in nitrous oxide and black carbon. Agriculture and related land uses account for 68% of methane and 79% of nitrous oxide emissions in Scotland.
- The 2016 interim report<sup>7</sup> on Scotland's progress towards the binding Aichi Biodiversity Targets set by the UN Convention on Biological Diversity outlines that: 'Scotland's biodiversity indicators, the condition of notified habitats and species on protected areas, and progress towards meeting Scotland's biodiversity targets demonstrated that biodiversity loss had not yet been halted and would require renewed and sustained effort over a longer period.' Multiple Aichi Targets are deeply connected to farming and food production (Targets 3, 4, 5, 8, 10, 12, 13, 14, 15, 20). Looking more closely at the analysis of the 2017 report on Scotland's progress<sup>8</sup>, Target 3 is explicitly to eliminate, phase out or reform incentives that harm biodiversity, and the progress report for Scotland recognises that we are failing to meet this target, and that 'positive and direct payment for agri-environment activity is a limited element within overall farm support'<sup>9</sup>. Other targets that we are currently failing to meet where agriculture, fisheries or any other methods of food production are specifically referenced are Targets 4 (Sustainable production and consumption), Target 7 (Sustainable agriculture, aquaculture and forestry), and Target 14 (Ecosystems and Services safeguarded).
- The adjacent table shows a breakdown by ecosystem of Scotland's Natural Capital Index (2017). Overall, Scotland's natural capital stocks have largely stabilised since 2000, but when you break this down by individual habitat types,



<sup>6</sup> Intergovernmental Panel on Climate Change (2018). Global Warming of 1.5°C. Summary for Policy Makers. Available from: [https://report.ipcc.ch/sr15/pdf/sr15\\_spm\\_final.pdf](https://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf)

<sup>7</sup> Scottish Natural Heritage (2016). Scotland's Biodiversity Progress to 2020 Aichi Targets. Interim Report 2016. Available from: <https://www.cbd.int/doc/world/gb/gb-nr-oth-p1-en.pdf>

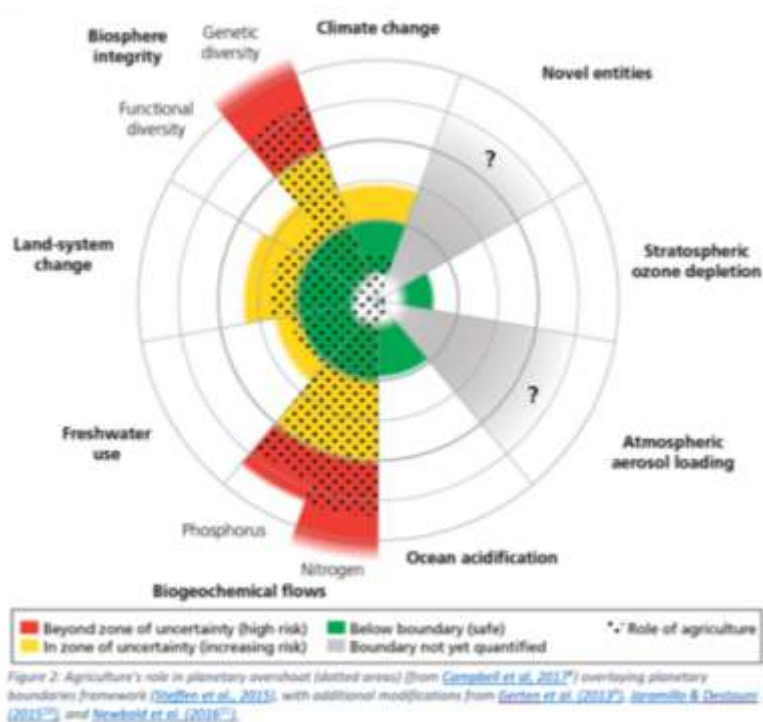
<sup>8</sup> Scottish Natural Heritage (2017). Scotland's Biodiversity Progress to 2020 Aichi Targets. Interim Report 2017. Available from: <https://www.cbd.int/doc/world/gb/gb-nr-oth-p2-en.pdf>

<sup>9</sup> Scottish Natural Heritage (2017). Scotland's Biodiversity Progress to 2020 Aichi Targets. Interim Report 2017. Available from: <https://www.cbd.int/doc/world/gb/gb-nr-oth-p2-en.pdf> p.17

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a much more mixed picture is apparent, with natural capital stocks in mires, bogs, fens, heathland and agriculture and cultivated showing marked declines.<sup>10</sup>

- In Scotland, SEPA estimate that we live as though we had enough resources for three planets.<sup>11</sup> ‘One-planet prosperity’<sup>12</sup> requires an urgent, systemic transition in our food production. This correlates with Scotland’s existing commitments under Sustainable Development Goal 12 to ‘ensure sustainable consumption and production patterns’<sup>13</sup> with ‘developed countries taking the lead’. The RISE Foundation recently concluded in an analysis of all EU member states’ safe operating space for livestock that the UK has no room for further expansion, and that reductions in livestock and intensity are necessary to comply with existing climate targets and remain within planetary boundaries<sup>14</sup>.
- We are currently exceeding multiple planetary boundaries. Agriculture’s role in exceeding these



<sup>10</sup> Scottish Natural Heritage (2017). Scotland’s Biodiversity Progress to 2020 Aichi Targets. Interim Report 2017. Available from: <https://www.cbd.int/doc/world/gb/gb-nr-oth-p2-en.pdf> p.61

<sup>11</sup> Scottish Environment Protection Agency. One Planet Prosperity – Our Regulatory Strategy. Available from: <https://www.sepa.org.uk/media/219427/one-planet-prosperity-our-regulatory-strategy.pdf>

<sup>12</sup> Scottish Environment Protection Agency. One Planet Prosperity – Our Regulatory Strategy. Available from: <https://www.sepa.org.uk/media/219427/one-planet-prosperity-our-regulatory-strategy.pdf>

<sup>13</sup> United Nations. Sustainable Development Goal 12. Online. Available from: <https://sustainabledevelopment.un.org/sdg12>

<sup>14</sup> Buckwell, A., Nadeu, E. (2018). What is the safe operating space for EU livestock? RISE Foundation, Brussels. Available from: [http://www.risefoundation.eu/images/files/2018/2018\\_RISE\\_LIVESTOCK\\_FULL.pdf](http://www.risefoundation.eu/images/files/2018/2018_RISE_LIVESTOCK_FULL.pdf)

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boundaries is explored by Campbell et al. (2017) based on the planetary boundaries framework (Steffen et al., 2015<sup>15</sup>). Fig. 2 above shows the role of agriculture (dotted area) in the overshoot of nitrogen and phosphorus cycles, land-system change, freshwater use, and functional and genetic diversity (what amounts to biodiversity). Two out of the nine planetary boundaries are pushed beyond the zone of uncertainty (indicating high risk) by agricultural practices.

- We also live in a globalised food system, where our food production and consumption choices have a considerable impact on the environments of other countries around the world. More than half of the UK's food and animal feed is imported, and therefore roughly 2/3 of the environmental impact of our diets is located abroad. These impacts in other countries are also largely as a result of intensive agriculture and land use change, such as deforestation.<sup>16</sup>
- Globally we need to make a shift to a circular economy. The Ellen MacArthur Foundation estimates that: 'Overall, for every dollar spent on food, society pays two dollars in health, environmental, and economic costs. Half these costs – totalling USD 5.7 trillion each year globally – are due to the way food is produced and are a direct result of the 'linear' nature of modern food production, which extracts finite resources, is wasteful and polluting, and harms natural systems.'<sup>17</sup>
- The responsibility for change cannot fall entirely on consumers. A recent report<sup>18</sup> has shown that over 40% of insects, which underpin our ecosystems and food system, are threatened with extinction, with habitat loss due to conversion to intensive agriculture, and application of pesticides, cited as the main drivers. The figures indicate the UK is seeing the largest of these declines. The authors of the report highlight that the fix must be found in the way we produce food, not merely in the way it is consumed<sup>19</sup>. We need production side policies not only demand side changes.
- The pollination of crops, fruit and vegetables in the UK by insects is worth approximately £630 million pounds each year (2012 figures<sup>20</sup>); in Scotland the value of pollination services to crop production is about £60 million a year<sup>21</sup>. Although honeybees are important pollinators, it is the diversity of native pollinators that is required for a healthy yield and quality crop to be

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<sup>15</sup> Steffen, W., K. Richardson, J. Rockström, S. E. Cornell, I. Fetzer, E. M. Bennett, R. Biggs, S. R. Carpenter, W. de Vries, C. A. de Wit, C. Folke, et al. 2015. Planetary boundaries: guiding human development on a changing planet. *Science* 347(6223):1259855. <http://dx.doi.org/10.1126/science.1259855>

<sup>16</sup> Nourish Scotland (2018). Food Atlas 2018-2030: Mapping out a sustainable food future.

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<sup>18</sup> Sanchez-Bayo, F., Wyckhuys, K.A.G. (2019). Worldwide decline of the entomofauna: A review of its drivers. *Biological Conservation*. 232. April 2019. P.8-27. Available from: <https://www.sciencedirect.com/science/article/pii/S0006320718313636>

<sup>19</sup> Scottish Wildlife Trust (2019). The Apocalypse of Small Things. Blog Post. Available from: <https://scottishwildlifetrust.org.uk/2019/03/the-apocalypse-of-small-things/>

<sup>20</sup> Garratt, M., Potts, S. and Vanbergen, A. (2015) Crop pollination by wild and managed bees: why diversity matters. Living with Environmental Change. Note number 19- Insect Pollination Initiative.

<sup>21</sup> Breeze, T., Roberts, S and Pott, S. (2012) The decline in England's Bees: Policy review and recommendations. University of reading and Friends of the Earth.

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produced as they are often more effective at pollinating a range of plant species<sup>22</sup>. If bumblebee and other insect pollinator declines continue, the extremely high cost of pollinating these plants by other means could significantly increase the cost of fruit and vegetables (hand-pollinating British crops has been estimated to cost £1.8 billion annually<sup>23</sup>).

- Scottish households waste 630,000 tonnes of food each year,<sup>24</sup> most of which is avoidable.<sup>25</sup>

As such, food production, consumption and our wider food system are deeply intertwined with the environment. The aims of a Good Food Nation can put us on the path to sustainable food production and consumption. The above data show that there are multiple ways that the food system impacts the environment, and as such, a multi-pronged and coordinated approach to halving the environmental impact of food is necessary through the Good Food Nation agenda, directed and overseen by the structures and processes established in framework legislation. The statement of policy and duties on ministers and public authorities are part of this, in addition to an overseeing statutory body, headline targets on the face of the bill, and the right to food for everyone in Scotland.

### Why is the right to food important for the environment?

A Good Food Nation bill would need to incorporate the right to food in Scottish law. This means that everyone has a right to not go hungry, and that everyone has a right to available, accessible, adequate and, crucially, sustainable food, to safeguard the right for ourselves and for future generations. Therefore, the right to food is about food security in the long-term and in the holistic sense.

This is fundamentally linked to environmental quality, including wildlife, habitats and landscapes, and sustainable food production, which hinges on how we protect and manage public goods from land.

The dominant narrative right now is that our need for food security limits what we can do to deliver public goods, and food security is the reason why we continue to underpin our current model of agriculture and land use. In reality, we haven't been directing public money to ensure food security for many years, otherwise we wouldn't be using a large proportion of our cereals for alcohol or animal feed; we wouldn't see such a mismatch between what we produce and what we consume, and we would act on food waste which sees around 1/3 of edible food not eaten globally. The Rise Foundation argues that the true definition of food security 'is, or should be, as much to do with sustainable consumption levels, access to affordable food by the poor, and minimizing waste, as agricultural production per se... Indeed, the most serious threat to EU (and global) food security are potentially unsustainable production systems which undermine biodiversity (for example pollinators), degrade soil

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<sup>22</sup> Breeze, T., Roberts, S and Pott, S. (2012) The decline in England's Bees: Policy review and recommendations. University of Reading and Friends of the Earth. Available from: [http://www.step-project.net/files/DOWNLOAD2/Breeze\\_2012\\_FoE.pdf](http://www.step-project.net/files/DOWNLOAD2/Breeze_2012_FoE.pdf)

<sup>23</sup> Breeze, T., Roberts, S and Pott, S. (2012) The decline in England's Bees: Policy review and recommendations. University of Reading and Friends of the Earth. Available from: [http://www.step-project.net/files/DOWNLOAD2/Breeze\\_2012\\_FoE.pdf](http://www.step-project.net/files/DOWNLOAD2/Breeze_2012_FoE.pdf)

<sup>24</sup> Scottish Government. (2014). Recipe for Success: Scotland's National Food & Drink Policy Becoming a Good Food Nation. Online. Available from: <https://beta.gov.scot/binaries/content/documents/govscot/publications/consultation-paper/2014/06/recipe-success-scotlands-national-food-drink-policy-becoming-good-food/documents/00453219-pdf/00453219-pdf/govscot:document/>

<sup>25</sup> Zero Waste Scotland. Reduce Food Waste. Online. Available from: <https://www.zerowastescotland.org.uk/Looking-For-Ways-To-Reduce-Food-Waste>



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and water quality and emit climate-damaging greenhouse gases from which agriculture is a potentially serious victim.’<sup>26</sup>

When we view land management through a food lens, we can take a much wider perspective, and recognise that sustainable land management and the delivery of public goods contributes to a much broader and more holistic definition of food security, and is central to the right to food, and has much wider links to health, social justice and human welfare more generally.

### What would Scottish Environment LINK like to see from the framework proposals for a Good Food Nation?

- We agree with the Scottish Food Coalition’s proposal for a **headline target** on the face of any new framework legislation to ‘halve the environmental impact of food’.
- We feel that the aims of a Good Food Nation will not be achieved without putting food production in Scotland on a more sustainable footing. As we discuss more below, **reforming our support for agriculture** can put food production on a more sustainable footing, through taking a ‘public money for public goods’ approach, and by **ensuring that regulation and support throughout the food system supports the most nature- and climate-friendly food producers**.
- In addition, a Good Food Nation framework must also address consumption, and include measures and policies that support a transition to sustainable diets. Tim Lang and Pamela Mason outline a definition of the values that make up sustainable diets<sup>27</sup>, which are:
  - Quality: taste, seasonality, authenticity
  - Social values: identity, religion, animal welfare, skills, cultural appropriateness
  - Environmental: safe guarding biodiversity, protecting soils, reducing climate impact of food production
  - Health: including safety, nutrition, social determinants of health (access), education and protection from marketing
  - Economy: resilience and efficiency of supply chains, decent pay and working conditions, fully internalised cost
  - Governance: evidence-based policy, democratic accountability, transparency and trust between actors in the food system and citizens.

These values are all well-aligned with the aims of a Good Food Nation. Helping Scottish people to shift their food consumption in line with these values, and ensuring that Scottish production and the food we import from elsewhere also conforms to these values, will ensure that we meet the aims of a Good Food Nation.

- We feel that **incorporating the right to food** is crucial from both a social and an environmental point of view, alongside the recognition of the right to a healthy environment as proposed by the First Minister’s Advisory Group on Human Rights Leadership, defined as the ‘right of everyone to benefit from healthy ecosystems which sustain human well-being as well the rights

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<sup>26</sup> Buckwell, A. *et al.* (2017). CAP – Thinking Out of the Box: Further Modernisation of the CAP – Why, what and how? RISE Foundation, Brussels. Available from: [www.risefoundation.eu/images/files/2017/2017\\_RISE\\_CAP\\_Full\\_Report.pdf](http://www.risefoundation.eu/images/files/2017/2017_RISE_CAP_Full_Report.pdf)

<sup>27</sup> Mason, P., Lang, T. (2017). *Sustainable Diets*. Abingdon: Routledge.

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of access to information, participation in decision-making and access to justice.’<sup>28</sup> To deliver both the right to food and the right to a healthy environment requires sustainable food production, which will deliver good food, healthy ecosystems, and the landscape quality and recreational benefits for human health and wellbeing.

- We agree that a **statement of policy** or national plan for food is necessary, and that legislation should **place duties on ministers and public bodies**. A statement of policy should be laid before parliament for scrutiny, with Scottish Government required to have regard to the views of parliament rather than for information. To ensure that this the statement has impact, ministers and public bodies should be obliged to **‘act in accordance with’** or **‘ensure the application of’** rather than to ‘have regard to’ the statement of policy. We expect a statement of policy to align with the Scottish Government’s Climate Change Plan, Scotland’s biodiversity targets, environmental principles, the principles of a circular economy, and additional social and environmental objectives.
- We feel that the commitment for ministers and public bodies to ‘have regard to’ international obligations is not strong enough and arguably should already be the case. Ministers and public bodies should be obliged to **‘act in accordance with’** or **‘ensure the application of’** our international obligations. We expect that these international obligations will include our commitments to the Sustainable Development Goals, the UN Convention on Economic, Social and Cultural Rights, the Paris Agreement on Climate Change, the Convention on Biological Diversity and the Aichi Targets, the UN Convention on the Law of the Sea, and any additional environmental agreements to which Scotland is a signatory.
- There is also a lot that we still don’t know about the impact of our highly complex and interconnected food systems in Scotland. **Investing in robust monitoring, data and baselines** is essential to evaluating our progress and confidently continuing to progress towards becoming a Good Food Nation.

### **Q2: To what extent do you agree that Government should encourage and enable businesses in particular to play their part?**

Scottish Environment LINK **strongly agrees** that government should encourage and enable businesses to play their part.

Business practices fit for a Good Food Nation are ones which contribute to a sustainable food system, from production through to waste. As detailed above, while some farmers and crofters truly go above and beyond for nature and the environment, Scottish food production as an industry is part of a short-term, high-externality food system, which is inherently unsustainable.

However, food production is one of the areas where we already have the mechanisms in place to influence its environmental impact. Through changes to agricultural regulations, financial support, and a robust look at the advice that is given, we can make a huge difference to the sustainability of the whole food system, safeguarding our long-term food security and our right to food, while contributing

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<sup>28</sup> First Ministers Advisory Group on Human Rights Leadership (2018). Recommendations for a new human rights framework to improve people’s lives. Report to First Minister. Available from: <https://humanrightsleadership.scot/wp-content/uploads/2018/12/First-Ministers-Advisory-Group-on-Human-Rights-Leadership-Final-report-for-publication.pdf>



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to solving Scotland's most pressing environmental issues, such as addressing wildlife declines and climate change, and restoring our fragmented ecosystems and landscapes.

Scotland has unique opportunities to produce food in a nature- and climate-friendly way. A report by WWF and Vivid Economics<sup>29</sup> showed that agriculture can reduce climate-warming emissions by 35% and still maintain production. In addition, Scotland has substantial natural assets that put us in a good position, having opportunity for carbon sequestration and enhancing biodiversity through peatlands, wetlands, forests, and especially sustainable extensive agriculture on the 40% of Scotland's agricultural land that is classified as 'high nature value'. But virtually all nature- and climate-friendly practices are under-rewarded through the current support system. The current system disproportionately supports the better land, leaving the majority of farmers and crofters on Scotland's less favoured areas (about 85% of Scotland's agricultural land) without adequate livelihoods through profitable food production, but also without support for delivering benefits through their abundant natural assets.

If we instead supported public goods, Scotland would have a competitive advantage, and Scotland's food production system would be contributing to the aims of a Good Food Nation. A truly sustainable farming regime is one which produces good quality food (in terms of nutritional value, wholesomeness, taste, and so on) in a way that also conserves the natural resources on which production is based and delivers a whole range of public benefits (from carbon sequestration to attractive and accessible landscapes and the spiritual uplift that these can provide). Scotland is well-placed to produce food in this way with the right support for farmers and crofters. It is in Scotland's interest to promote a vision of agriculture that combines all these outputs and to adopt a support system which rewards those who conform to this model. In that way Scottish farming can be genuinely "world-leading".

Therefore, through a new Good Food Nation framework, and driven by a new framework law on food, and a statement of policy on food, Scotland should adopt a 'public money for public goods' approach to support for agriculture and wider land uses. This will indeed enable and encourage food production businesses to make the transition to a sustainable food system with nature at its heart. Our current food system's inability to sustain itself in the long-term is a form of market failure, and a public money for public goods approach can help to correct this.

There is also a reputational advantage of being a leader in sustainable food business. Scotland is already associated with quality food and drink, and businesses across the food system should be enabled and encouraged to live up to this accolade. And everyone needs to play a role. Retailers are currently leading the way ahead of Government in reducing packaging, improving carbon footprints of produce and supporting local producers. But these efforts are not systematic enough and Government can play a role in creating a level playing field which can truly make a difference.

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

Scottish Environment LINK **strongly disagrees** with the proposed approach to accountability. From previous experience, standalone strategies without the concrete structures and processes to make them a reality rarely achieve their intended impact. For example, the Scottish Land Use Strategy, which

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<sup>29</sup> WWF Scotland and Vivid Economics (2019). A Climate of Possibility: Harnessing Scotland's natural resources to end our contribution to climate change. Available from: [https://www.wwf.org.uk/sites/default/files/2019-01/WWF\\_Report\\_VIVID\\_Jan\\_2019.pdf](https://www.wwf.org.uk/sites/default/files/2019-01/WWF_Report_VIVID_Jan_2019.pdf)

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contains important and relevant proposals and policies, has largely failed to introduce more integrated and fit for purpose land use, largely because there were no structures or accountability mechanisms to see the strategy through to concrete action.

As such, we acutely need to accompany a new policy with the appropriate structures and processes to ensure that it is implemented, and that is one of the reasons why we need a statutory body, such as a food commission.

The second reason is that this new policy area implies a fundamental shift in how we govern the food system; replacing what is currently a piecemeal, ad hoc approach, with a joined-up, coherent one. To do this, we need a structure that oversees all policy development and delivery in the food system. A food commission could fill this function, ensuring that we avoid contradictory policies. A well-resourced statutory body can commission research, provide recommendations to government and keep an eye on our multiple, interrelated goals. Ultimately, this will allow us to not only meet environmental objectives, but social and economic ones also.

### **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.**

Scottish Environment LINK **strongly disagrees** with the proposal for targeted legislation as an alternative to a single piece of legislation.

Framework legislation is necessary for establishing food as a new policy area, and for ensuring that we take an overarching view of the food system. While targeted legislation may be necessary, we see this as delivering more detailed mechanisms, and should be subordinate to a framework law. We do not think that it will be possible to make fundamental changes to the food system through targeted legislation, as these will always be viewed through a sectoral lens.

In addition, we need a framework law to cohere with other developing legislation and policy areas which underpin environmental interventions and protections. This legislation and policy area is being developed in the context of considerable change, both as a result of Brexit, if and when this happens, and with multiple bills proposed or proceeding through stages. A Good Food Nation Bill must be developed in a way that is complementary to the aims of the Climate Change Bill and should be consistent with the proposals emanating from two key consultations for a Scottish Environment Strategy and on Environmental Principles and Governance in Scotland. Scottish Environment LINK believes that an Environment Bill will be necessary, incorporating key environmental principles into Scots law, setting clear targets for the environment, and an environmental watchdog. The Good Food Nation agenda should be consistent with these principles, and have complementary targets. Other relevant future legislation and policy on Agriculture and Fisheries should demonstrate cross-compliance with a Good Food Nation Bill, and make an explicit contribution from Scotland's food production sectors to meeting the headline targets in the bill.

This response was compiled on behalf of LINK's Food and Farming Subgroup and is supported by the following members:

Amphibian and Reptile Conservation  
Badenoch & Strathspey Conservation Group  
Bumblebee Conservation Trust

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Buglife Scotland  
Butterfly Conservation  
Cairngorms Campaign  
Friends of the Earth Scotland  
Froglife  
National Trust for Scotland  
North East Mountain Trust  
Nourish Scotland  
Plantlife Scotland  
RSPB Scotland  
Scottish Allotments and Gardens Association  
Scottish Badgers  
Scottish Wild Beavers Group  
Scottish Wild Land Group  
Scottish Wildlife Trust  
Soil Association Scotland  
Woodland Trust Scotland  
WWF Scotland

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