Scottish Environment LINK
2 Grosvenor House
Shore Road
Perth
PH2 8BD

Tel 01738 630804
Fax 01738 643290

enquiries@scotlink.org
www.scotlink.org

Alistair Prior
Scottish Government
Room 256
Pentland House
Robb's Loan
Edinburgh EH14 1TY

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"Choosing the Right Ingredients: The future of food in Scotland"
A Scottish Environment LINK response to the Discussion Paper

Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations. LINK consists of 34 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. We strongly support the idea of a joined up policy looking at all aspects of food production, processing, manufacturing and consumption although we would suggest that a "sustainable food policy" would be a more appropriate title. Our response will concentrate on the environmental aspects of such a food policy.

Introduction

LINK welcomes the launch of a national discussion on food policy. With recent unprecedented increases in grain prices; increased reliance on food imports; interest in biofuels and genetically modified crops; rising levels of obesity and simultaneously greater consumer demand for healthier food and local, sustainable production methods, such a discussion is well timed. The additional pressures on land, both nationally and globally, demonstrate the need to take biodiversity, the landscape and the wider environment into account at an early stage of such a policy. The discussion document contains many positive environmental aspirations such as reducing transportation distances of food, producing more organic food, reducing energy use and waste in processing and promoting consumption of local foods. This has the potential to improve the link between agriculture and fisheries and consumers, increase public knowledge of

where food comes from and how it is produced and provide a boost for Scottish agriculture and the food industry. LINK would like to see this opportunity to develop a truly sustainable food policy for Scotland fully realised. For this to happen, the stated aim of the document to take all sectors and all stages of food production, processing and distribution into account, must be achieved. As it stands, there are a number of areas that require further attention if this policy is to really represent a joined up approach to food production. The following represents LINK's initial thoughts on areas where attention should be directed as the policy develops.

International Impacts

Whilst we welcome a focus on local food and food miles as one element of sustainability of the food industry, it should not be considered in isolation. Looking specifically at climate emissions, the way that our food is farmed is far more important than how it is transported. Farming and the food industry account for 25% of Scotland's CO2 equivalent emissions[1] – as much as the country's whole transport emissions. Meat and dairy production globally account for 18% of climate emissions.

If we consider the wider environmental implications, food production and consumption accounts for between a quarter and a third of our ecological footprint – the measure of our impact on the world. Agriculture globally accounts for 70% of the world's use of freshwater. The recent increase in consumption of out-of season fruit and vegetables is putting increasing pressure on fragile water resources in water scare areas like the Mediterranean. Farming is the main driver of habitat loss in tropical forests and grasslands. Today habitats are being lost to commodities like palm oil, which is found in a large number of processed foods, and soy from Latin America, which is used as animal feed in the UK and Europe. More than half of the world's fisheries are already fully exploited and a quarter are over fished.

Since more than 40% of the food we eat is imported, Scotland is as much a part of the global food crisis as anywhere else. We are all responsible for these global impacts, not just the food industry and Governments but each of us as individual consumers.

A food policy cannot ignore the increasing use of agricultural land to produce energy crops. Recent evidence suggests that current biofuel targets are not sustainable and some first generation biofuels may not reduce greenhouse gas emissions[2]. We particularly note the recent International Assessment of Agricultural Science and Technology for Development (IAASTD) report, backed

[1] GHG Inventory 1990-2005 AEA 2006: http://www.airquality.co.uk/archive/reports/cat07/0709180907_DA_GHGI_report_2005.pdf

[2] e.g. conversion of Indonesian swamp forest to grow oil palm may take 420 years for production of biodiesel to "pay back" the carbon debt created by destruction of the forest. Ethanol production from maize may produce net emissions because of fertiliser use and the energy intensive production process (RSPB, 2008, A Cool Approach to Biofuels)

by the UN and World Bank, which further highlighted the pressure on environmental resources (soils, water and forests) arising from agricultural activity including feedstocks for biofuels.

Minimum standards

Different methods of producing food have the potential to have very different impacts on the environment. Minimum standards for agriculture and fisheries should ensure that no food production, wherever in the world it happens, cause damage to the environment. In Europe, cross compliance currently provides a baseline standard for agriculture but it is not well enforced in Scotland, partly because some of the conditions within GAEC (Good Agricultural and Environmental Condition) are ambiguous . Rules should be clear and easy to measure to ensure that they are implemented equally across the country. They should ensure that agricultural practices do not damage biodiversity, water quality, the landscape and historic environment or cause significant greenhouse gas emissions. **Scottish Government should review cross-compliance requirements in order to ensure they provide clear and enforceable baseline conditions attached to the payment of annual public funding of £450 million.**

Scottish Government should also work with the food retail sector to develop meaningful production standards on issues like biodiversity impacts and climate emissions to sit alongside their current standards on animal welfare and food safety in sectors like horticulture and pork production which are only partially covered by cross-compliance regulations. **The encouragement of transparent and accountable environmental criteria within quality assurance schemes for farmed produce should also be explored**, particularly as membership of some of these schemes is currently subsidised by the public purse through Rural Development Contracts. Planning rules should also be properly enforced to ensure environmental damage from changes to the use of agricultural land is minimised. **Agricultural EIAs, in particular, would benefit from a review of their current role in preventing such damage, and we would like to see a review of their current use and scope initiated by Scottish Government**.

The recent loss of the majority of set-aside in Scotland, has shown the need to ensure safeguards are in place to protect water quality and wildlife on our farmed land, as voluntary approaches are inadequate, especially in the face of buoyant market conditions for arable crops. Scotland's wildlife, landscape, and wider environment are currently facing multiple threats through intensified arable farming and conversely, abandonment in the uplands and north and west. **Minimum standards, including cross-compliance, should ensure that space is left for habitats for wildlife to feed, breed and migrate,** particularly in the context of climate change, or Scotland will fail to meet its international commitments on biodiversity.

Minimum standards outside the EU can sometimes be weaker but there should be a collective drive to raise them rather than enter a race to the bottom, not least because consumers should expect standards comparable to those from domestically sourced produce. **The Scottish**

Government should help the food industry to apply the same sorts of standards to imported commodities that it sources internationally as it does to domestically sourced produce. Areas of particular concern include the import of soy for animal feed for the Scottish meat and dairy sector which contributes to habitat loss in the Amazon and the South American Cerrado savannah. Equally important is the amount of fruit, vegetable and olive oil sourced from the Mediterranean Basin. The vertically integrated UK retail sector is in a prime position to push up standards globally and the Scottish Government has a part to play in making sure that it does.

The majority of Scotland's commercial fish stocks are not exploited in ways that could be considered sustainable; this is reflected plainly in the ICES stock assessment advice for 2007. However, recent moves towards accrediting individual Scottish fisheries through Marine Stewardship Council certification are to be welcomed in terms of management and transparency for consumers. Despite some shortcomings, the MSC Standard is the only internationally recognised set of environmental principles for measuring fisheries to assess if they are well managed and sustainable. These are based on the condition of the fish stocks, the impact of the fishery on the marine environment and the fishery management systems that are in place. **MSC should provide the minimum benchmark for all Scottish fisheries to move towards and food policies dealing with marketing, supply chain development and public procurement should focus on supporting MSC accredited fisheries**.

We welcome the current administration's precautionary approach to the use of biotechnology and note the recent conclusions of the IAASTD report that GM technologies in their current form are unlikely to play a large part in addressing the food crises facing the world's poor. While uncertainties remain over the potential impacts of GM crops on the surrounding environment, as well as on human health and the wider equity effects, such an approach should be maintained. We would also note the importance of consistency in this approach and the need to ensure that similar checks are carried out on imported GM products, including those entering the livestock feed-supply chain. It would be counter productive to seek to reduce costs in the livestock sector by permitting such GM feed and as a result, not only reduce returns, but also damage the image of Scotland's quality livestock product as a result.

Public funding to producers

Different farming methods have the potential to have very different impacts on Scotland's biodiversity, landscape, water quality and climate. A truly joined-up strategy should consider these in greater detail and signpost ways to promote win-win situations i.e. production of good quality Scottish food integrated with the delivery of public benefits. **A national discussion of the objectives of public subsidies to agricultural producers should be a central part of developing a national food policy**. Farming subsidies represent a very large amount of Scottish taxpayers' money. In 2006 alone, £600 million was spent on agricultural subsidies in Scotland, with Single Farm Payments (SFP) making up 75% of this. The SFP is directed according to historic

productivity and the largest payments are directed towards a small number of land managers, often practicing the most environmentally damaging forms of agriculture. This can disadvantage smaller, less commodity-productive farmers and crofters, whose low-input, low-output farming practices can be much more environmentally friendly. In addition, we must not ignore the implications of production subsidies on poor farmers and producers in developing countries. In our implementation of European policy, and in our influence on it, we should seek to ensure that support is given where it genuinely aids sustainability, and minimised where it harms the interest of poorer farmers, whether here or overseas.

Reducing payments based on historic production whilst increasing spending on rural development would help to maintain positive agricultural activity while ensuring funding is firmly linked to public benefits. Scotland's landscape and biodiversity are acknowledged as being of enormous importance not only to peoples' quality of life and sense of national identity, but also, economically, to Scotland's tourism and food and drink industries. Views of Scotland's hills or iconic native species are used to promote many Scottish products to consumers in Scotland and abroad. LINK would expect to see consideration of how High Nature Value farming systems[3] can be protected and promoted within the framework of a national food policy. Sheep and cattle grazing systems are in decline across many parts of Scotland. Crofting also faces an uncertain future in many areas. HNV systems should receive special support and recognition for the additional expense involved in producing quality food products while protecting Scotland's natural heritage. Measures could include providing infrastructure for local processing and financial support where wildlife, the landscape and wider environment is protected. **Scottish Government should examine ways, including those available through the toolkit provided by the Common Agricultural Policy, to support HNV systems.**

Marketing and branding opportunities

In order for consumers to make educated choices about the food they eat and the effects it is likely to have on the environment, clear consistent labelling must be developed. The success of organic labelling in Scotland shows how this can be achieved. Organic farming, should not, however be regarded merely as a marketing scheme. Farming using organic principles benefits water and soil quality and most organic farms are more biologically diverse than those using more intensive production methods. The additional public benefits produced through such farming methods should also be recognised and land managers should continue to receive support for organic conversion and maintenance. The IAASTD report made a call for wider use of agricultural practices that favour use of local resources, and use natural processes such as crop rotation and organic fertilisers.

[3] HNV farming systems are, typically, "low intensity, low input systems, frequently with high structural diversity"IEEP, 2007. HNV Indicators for Evaluation, Final report for DG Agriculture. Contract notice 2006-G4-04

Labelling may also be developed to add a price premium to other products with particular environmental benefits. Where land management is providing public benefits such as protecting biodiversity, this should be recognised and producers should be assisted with setting up clear labelling schemes which take not only the area of origin into account but also the benefits particular production techniques may have on the environment. The suggestion of a labelling scheme for products from crofts is a case in point. Such labelling schemes should also be tied to the management practices that produce additional public goods and should be properly accountable and appropriately verified so that the consumer knows that they are contributing to maintaining biodiversity, the landscape and a way of life.

Future seafood branding opportunities that reflect locality should be supported only if coupled with environmental accreditation criteria such as those adopted by MSC. Local branding initiatives could for example be developed in conjunction with future Coastal and Marine National Parks to provide consumers with a standard of local provenance and sustainability.

Likewise, in aquaculture the adoption of more robust forms of certification should be widely adopted by the industry and supported by government. While currently in development, organic aquaculture standards represent an opportunity to move the industry towards sustainability. Further development must be supported as a central element of the forthcoming review of the aquaculture strategy. The current review of the EU regulations for organic aquaculture must provide a level playing field across Europe, with that playing field being levelled up rather than down to ensure higher standards, building trust with consumers about product integrity and environmental performance.

All policies that seek to increase the consumption of Scottish wild captured finfish, shellfish and aquaculture products must only be considered once the full environmental sustainability implications of an enlarged market and/or increased Scottish supply within the market are fully understood. This means for example robustly assessing the carrying capacity for aquaculture in Scottish waters and resolving outstanding issues such as feed sustainability, farm siting and escapes. It also means that the ecosystem approach needs to be the basis of the work of the Scottish Fisheries Council when it considers market and supply chain development through its sectoral working groups.

Participation of the wider public

A stated aim of the food policy is to change individual behaviour and attitudes about diet and food choices. Personal dietary choice is the biggest single influencer of the environmental impact of our food just as it has the single biggest impact on our health. Following the national

guidelines on eating a healthy diet could reduce our national food footprint by about 15% but doing more to follow a sustainable diet can reduce it by as much as 40%[4].

Eating more fresh and seasonal fruit and vegetables and less processed and packaged food as well as less meat and dairy produce is as good for the environment as it is for our health. For these reasons, the Scottish Government needs to put much more effort into achieving national healthy eating targets. Most targets are not being met – but those that are, such as school meals, result from the introduction of legislative change rather than reliance on advice and awareness raising. A similar level of effort needs to be focussed on two areas of the highest health and environmental impacts – the low level of fresh and seasonal fruit and vegetable consumption and conversely the high level of meat and dairy consumption in Scotland.

One obvious way to do this is by encouraging people to grow their own food. This has the potential to play a much greater role in food production in Scotland and can meet many of the objectives of the strategy. As well as reconnecting people with where their food comes from, it should also reduce packaging and transportation and thus help mitigate climate change as well as having positive benefits on overall health and well-being. There are currently more than 6000 allotments in Scotland and over 3000 people on waiting lists. It has been calculated that 20 people may benefit from the produce from one allotment. The number of allotments has declined from a high of 90,000 at the time of the Second World War. However, interest in growing your own food is again rising as demonstrated by increase in seed, herb and fruit tree sales. **A national food policy should therefore set targets to increase the number of allotments available in Scotland and in educating people about how they can grow their own food**.

<u>Local supply chain development and public procurement</u>

As the discussion document points out, much of our food and in particular, a large proportion of our seafood is exported through well developed supply chains to destinations such as France and Spain, however few local supply chains exist to link public sector caterers, the private sector and individual consumers to locally grown, caught and reared produce. Attention needs to be given to developing local supply chains through rural development funding and public procurement. Government needs to improve its guidance on procurement for all foods, wherever they are produced to make sure that they are sustainable, it needs to do more to help public bodies change and it needs to set high standards for food such as only using MSC fish. Artisanal inshore fisheries and small-scale farming and crofting systems have the most to gain from local supply chain development. They are also economically important to particular rural and coastal communities in Scotland and are iconic elements of Scottish food culture.

[4] WWF Scotland, The Footprint of Scotland's Diet.: The environmental burden of what we eat. http://www.wwf.org.uk/filelibrary/pdf/the_footprint_of_scotlands_diet.pdf

What do we all need to do?

We appreciate that the purpose of "Choosing the Right Ingredients" is to stimulate discussion. However, as the national food policy develops, Scottish Environment LINK would expect to see **targets developed for the aspirations laid out in the document**. We would also like to see the following added to the section "What do we all need to do?"

European Commission

- Strike the right balance between free trade, biosecurity, environmental protection, food safety and consumer choice.
- Provide land managers with funding for provision of public goods such as biodiversity and a quality environment.

Scottish Government and associated agencies

- Ensure that public support to agriculture, aquiculture and fisheries is directed to maximise the public benefits provided such as ecosystem services or biodiversity and not just support food production or historic activity.
- Have a national discussion on the objectives of public subsidies to agricultural producers.
- Review cross-compliance requirements in order to ensure they provide clear and enforceable baseline conditions.
- Help the food industry to apply the same sorts of standards to imported commodities that it sources internationally as it does to domestically sourced produce
- Examine ways, including those available through the toolkit provided by the Common Agricultural Policy, to support High Nature Value systems
- Invest more in fresh, seasonal fruit and vegetable production and processing and less in intensive meat and dairy production.
- Invest much more in the full range of tools aimed at changing the Scottish diet.
- Set targets to increase the number of allotments available in Scotland and in educating people about how they can grow their own food.
- Encourage environmentally friendly farming including organic farming.
- Help land managers to adapt to climate change including providing space for wildlife to adapt.
- Maintain the precautionary approach to biotechnology in Scotland.

Local government

- Help to develop local supply chains and put in place standards encouraging sustainable production methods e.g. MSC for fish.

Producers

- Ensure production methods do not damage Scotland's natural and cultural heritage

- Provide space for wildlife and maintain and enhance the landscape and historic environment.

Industry bodies

- Introduce minimum standards to ensure that production, processing and manufacturing methods are of the highest environmental standards and do not cause damage to the environment in Scotland or in other countries.
- Encourage transparent and accountable brand labelling of produce where production methods are of high environmental standards and help to protect Scotland's natural and cultural heritage.

Academia

- Research links between different methods of food production and their environmental effects.
- Talk to farmers and crofters who use traditional, sustainable techniques so these can be adapted for use on modern farms.
- Research the greenhouse gas emissions caused by land use change, and how these can be mitigated so these can be fed into policy discussions.

Conclusions

With the adjustments suggested above, Scottish Environment LINK believes that a sustainable food policy for Scotland could help introduce beneficial changes to the way food is produced, processed and consumed in Scotland. We believe that the environmental aspects of the policy have been underplayed. For such a policy to be successful, land and water use, climate change and energy use must all be considered as priorities. We would suggest that SEPA and SNH as well as the relevant Scottish Government departments should be involved in further development of the policy. Scottish Environment LINK would also be keen to be involved in further stakeholder input into the policy.

The following organisations have signed up to this response:

Archaeology Scotland
Butterfly Conservation Scotland
Friends of the Earth Scotland
Marine Conservation Society
RSPB Scotland
Scottish Allotments and Gardens Society
Scottish Wildlife Trust
Soil Association Scotland
WWF Scotland