



What is your view about the scope of the Bill? What else, if anything, would you have liked to see included in the Bill? Please explain your reasons.

The scope of the bill needs to be broadened to allow it to address a wider range of issues in the food system, including biodiversity loss and environmental degradation as well as reducing food insecurity and paying a living wage to all workers.

Food production and consumption are key drivers of wildlife declines and environmental degradation globally, and here in Scotland. Food production is dependent on a healthy environment, including nutrient-rich biodiverse soils, clean water, pollinators and plant diversity. This Bill should provide an opportunity to identify and address the multiple environmental challenges and opportunities with our food system and lay the foundation for integrated policy which delivers Scotland's Good Food Nation ambitions.

However, this Bill as drafted is significantly lacking, particularly from an environmental perspective, and it is worrying that the draft legislation makes no mention of the importance of our food system to efforts to address the nature and climate emergency. This Bill should link with proposals for forthcoming legislation in this area, including the Circular Economy and Agriculture Bills. The Bill must also include a 'purpose clause' which must expand on what we mean by a Good Food Nation and should relate to the production as well as consumption of food. As such, the Good Food Nation Bill should make it clear that its purpose is to:

- Realise the right to nutritious, sustainable and safe food for people in Scotland.
- Ensure that we produce food in a way that is socially just and contributes to the outcomes of Scotland's Environment Strategy, forthcoming Biodiversity Strategy and Climate Change Plan.

There should also be targets on the face of the Bill so that the Plans drive change in the following areas:

- Public procurement of food – place duties on Scottish Ministers and public authorities for the procurement of locally produced, sustainable food.
- Food waste reduction – achieving a reduction of 33% by 2025 and 50% by 2030 from a 2013 baseline.
- Food footprint reduction - establish a baseline and introduce reduction targets.
- Impact of supply chains – end deforestation within Scottish food supply chains by 2030; phase out wild fish content in feed for Scottish fish farms by 2025, to be replaced with local sustainable protein sources.



- Synthetic fertilisers and pesticide use reduction – adopt the EU’s Farm to Fork strategy targets of 20% reduction in fertiliser use by 2030 and 50% reduction in the use of chemical pesticides by 2050.

What is your view of the decision not to incorporate the ‘right to food’ into Scots law through the Good Food Nation Bill? Please explain your reasons.

As above, we feel that the ‘right to food’ should be central to the purpose of the Bill. How can we be a truly Good Food Nation if the state does not take responsibility for ensuring that people in Scotland have access to nutritious, affordable and sustainable food?

We agree with the Scottish Food Coalition that the Bill is weak in making links with existing human rights law, requiring Ministers to only ‘have regard to’ particular parts of international instruments. We agree with the Scottish Food Coalition’s suggestions for strengthening the legislation at Stage 2 by including a definition of the ‘right to food’, including duties on Ministers to further the Right to Food and to report to parliament, and to recommend the Equality and Human Rights Committee examine this aspect of the Bill to provide fuller scrutiny.

How should the Bill and/or the Good Food Nation plans link to other food policy initiatives, for example the current process of producing a [Local Food Strategy](#), and addressing global impacts of food and drink supply chains – for example taking up any of the [Global Resource Initiative recommendations](#)?

The Bill should include the obligation for the Good Food Nation Plans to consider, align with and demonstrate how they are contributing to Local Food Strategies and UK initiatives to reduce global impacts of food and drink supply chains as well as, the Methane pledge, the Nitrogen pledge and the Nitrogen balance sheet.

It is also critical that the future agricultural bill is aligned with the GFN Plans such that it provides support to farmers, fishers and crofters for good, climate and nature-friendly food production.

What outcomes, indicators and policies should Scottish Ministers and ‘relevant authorities’ include in their Good Food Nation plans? Please explain your reasons.

Plans should contribute to the overall purpose and targets above and the additional policy documents mentioned. They should include milestones and specific outcomes which must be reported on.

Scottish Ministers should make connections with other government strategies and plans in their GFN plans, including the Environmental Strategy, Land Use Strategy and forthcoming Biodiversity Strategy. The outcomes and indicators identified by the Environment Strategy will be particularly important for ensuring the impacts of food production on the natural environment are taken into account and we urge the committee to consider what links the government should make with this



work. The newly published Nitrogen Balance Sheet shows the huge role the food system plays in nitrogen flows, and crucially as a source of excess nitrogen. Nitrogen Use Efficiency is a useful metric to include in indicators. On-farm metrics should be developed and reported on to assess levels of sustainable production.

The Bill requires that Scottish Ministers and ‘relevant authorities’ must, when exercising a specific function or a function falling within a specific description, have regard to the national good food nation plan. Those “specified functions” will be set out in secondary legislation. In your view, what should those functions be? Please explain your reasons.

- Setting annual budgets – this would allow ministers to assess the impact of funding allocations on the ability to meet the requirements of the GFN legislation. It would allow relevant authorities to assess whether their own budget allocations, including procurement decisions, meet GFN requirements.
- In individual procurement decisions and in any updates to procurement policy – by taking GFN goals into account early in the procurement process we can ensure that action is taken to meet the goals set by the legislation.
- Funding and enterprise support
- Contracts and agreements
- Planning – by taking GFN requirements into consideration in the production of Local Development Plans we can help to ensure that space is given to local food systems and outlets where healthy, local and affordable food can be purchased. Integrating GFN ambitions with Scottish planning policy can help to ensure ‘food deserts’ in deprived communities can be avoided in future.

The Bill does not provide for a body to oversee how the Scottish Government and ‘relevant authorities’ are implementing the Bill; what is your view on this? Please explain your reasons.

This omission means that a vital piece of the jigsaw is missing and risks the effectiveness of this legislation in driving the changes that are urgently needed. Good Food Nation policy spans a number of Government portfolios, and without a dedicated body to oversee it, there is a real danger that it will fall through the gaps. We agree with the Scottish Food Coalition’s calls for a new standalone body to oversee the implementation and report to parliament. One particular role they could play is assessing the environmental footprint of Scotland’s food system, including global footprint, to inform a target for its significant reduction.

What impact will the Bill have for local authorities and health boards?

Local authorities should take account of their purchasing and use of food as part of their wider biodiversity duty. LINK will be pushing hard for this to be strengthened during future consultation on nature targets.

This response represents the collective view of LINK’s Food & Farming Group. Members may also respond individually in order to raise more detailed issues that are important to their particular organisation.



Scottish Environment LINK is the forum for Scotland's voluntary environment community, with 42 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

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