

## Response ID ANON-6CG5-A5ZY-X

Submitted to Good Food Nation Proposed National Plan  
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### About you

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I would like my response to be published in its entirety

3 What is your name?

Name:  
Simon Kenton-Lake

4 What is your email address?

Email:  
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5 Are you responding as an individual or on behalf of an organisation?

Organisation

### Organisation details

1 Name of organisation

Name of organisation:  
Scottish Food Coalition

2 Information about your organisation

Please add information about your organisation in the box below:

The Scottish Food Coalition is a diverse alliance of more than 60 organisations concerned with poverty, health, environment and animal welfare, as well as trade unions, small producer organisations, international development organisations and faith groups. We have been together since 2016 working for a just transition to a fair, healthy, sustainable food system, and were heavily involved in securing the passage of the Good Food Nation Act (Scotland) 2022.

### Questions

1 Thinking about those aspects of the Proposed National Good Food Nation Plan related to public health, health services and social care, what, if any, specific changes would you like to see reflected in the finalised national plan?

Please provide your response in the box provided.:

We welcome areas of the newly proposed Plan relating to public health and social care which we feel are particularly strong and will be one of the most important intersections between local authority and health board Local Good Food Nation Plans. We welcome focus on health inequalities, and a wide range of indicators related to food consumption and the dietary health outcomes. We also note the alignment with the broader human rights approach and welcome the clear language in the Plan around the recognition of food as a human right. We hope this will be further realised in a future Scottish Human Rights Bill to ensure universal access to high quality and appropriate nutritious food, produced in a way that is equitable for people, animals and the planet.

Given the cross-cutting nature of the Plan we feel it would be strengthened by taking a more explicit 'One Health' approach that acknowledges the intrinsic links between human, animal, and the environmental health. This recognises the intersections between public health, veterinary medicine, agriculture, environmental science, and social care to address shared health challenges - such as zoonotic diseases, antimicrobial resistance, and the health impacts of climate change. In addition, by addressing health risks holistically, it supports better health outcomes overall, for example for workers in industries such as agriculture, aquaculture and animal husbandry. This integrated approach aligns well with Scotland's Good Food Nation ambitions for sustainable public health, social well-being, animal welfare, fair work and environmental stewardship, ensuring that policies and services work together to protect and improve the health of current and future generations. Given this alignment in systemic perspectives, and the fact that poor diets are one of the main causes of preventable ill health and death in Scotland, we believe the Population Health Directorate is best placed to lead the Good Food Nation work.

In terms of more detailed aspects of the Plan, we would like to highlight a number of specific areas for further consideration.

As noted in the Plan, the Scottish Dietary Goals (SDG) are long overdue a review and we feel the Plan currently misses an opportunity to recognise the impact of diets high in Ultra Processed Foods (UPFs), particularly those associated with high fat, salt and sugar. UPFs currently make up more than half the average shopping basket, and two thirds of children's daily energy intake (UK). The SDGs should reflect this with a focus on 're-balancing' diets with increased consumption of plants, less and better meats and minimally processed foods. Additionally, we would like the Plan to show a commitment to early years nutrition, including increased support and initiatives to keep raising breastfeeding rates, where appropriate and desirable, which would provide both nutritional and developmental benefits for infants and lower risks of cancers and chronic diseases in mothers.

Aligned to this we support the call by colleagues at ASSIST FM, amongst others, for Universal Free School Meals (UFSM) to be extending to all Primary and Secondary pupils, especially given the strong evidence that this supports public health, reducing poverty and equality. We welcome the mention of improving nutritional care in all care settings including hospitals and care homes but would like to see more recognition of the reality of food insecurity for many vulnerable groups, including older people and social care staff, and the systemic issues that affect adequate food access.

Finally, we see a clear link between our food environment and our ability to make healthy, affordable and sustainable food choices. There is no clear mention in the Plan of the role of food businesses, especially local independent retailers, in improving Scotland's food environment nor how planning - for example through National Planning Framework 4 - might be well used to discourage the proliferation of 'fast food' outlets and advertising for unhealthier food choices. Given the need for 'inclusive consultation including with children and young people' on all Plans, mention must be made on the need to proactively engage communities in important decisions that impact their ability to access 'good food' in the food environment, such as with retail and take-away outlets available on local high streets.

2 Thinking about the role of local government in delivering the Plan, particularly through procurement, what, if any, specific changes would you like to see reflected in the finalised national plan?

Please provide your response in the box provided.:

Given the hugely important role that public procurement plays in the Scottish food system, we are pleased that the Local Government, Housing and Planning Committee has been given the opportunity to scrutinise the Plan. As you will agree, public food is an investment not a cost: in health and wellbeing, in local economies, natural environments and people, and in staff and fair work standards.

We are surprised by the lack of cooperation between the government, local authorities and health boards in developing the Plan. Food systems transformation is a complex challenge, requiring close collaboration and dialogue between governments and agencies operating at different levels, with those agencies supporting and reinforcing each other's actions. It also requires close alignment of outcomes and appropriate delegation of responsibilities and budgets. We have seen this approach effectively implemented in the 2025-35 Population Health Framework. We believe this is one of many reasons why Population Health Directorate is best placed to lead on the Good Food Nation work going forward.

We would like the final Plan to outline clear mechanisms for ongoing cooperation between the national government and relevant authorities – one which allows for dialogue and collaboration, not presumption of national policies simply cascading down to local level.

The cross-cutting nature of the Plans, both National and Local, means there must be stronger emphasis on the need for effective partnerships between government, relevant authorities and with those other organisations best placed to support delivery of the Plans at a systems level. It's not clear from the current Plan how this will happen and we feel that good practice should be taken from existing food partnership models such as Sustainable Food Places which supports nearly 140 UK partnerships and already works across half of all Scottish local authorities. Food partnerships bring together key stakeholders to facilitate collaboration and communication across local, regional and national food systems: from local authorities, health boards, public sector and civil society organisations, to food growers, retailers and the hospitality sector. We believe that only by taking such an approach can we achieve our Good Food Nation ambitions.

We welcome the Plan's commitment to invest in initiatives such as 'Food For Life Served Here' that facilitate positive food system change in public settings. In addition the Plan should set targets for procurement of sustainably sourced food, e.g. seasonal, 'local' and organic food, with a preference for sourcing ethical Fair Trade when not otherwise available. There are examples elsewhere in Europe where public procurement has driven demand and growth in organic, delivering socio-economic and environmental benefits. It is disappointing that Scottish Government's key guidance document for supporting sustainable procurement 'Catering for Change' has still not been updated.

We need more processing infrastructure that can enable more localised, sustainable supply chains to bring more Scottish food onto the public plate. E.g. abattoirs for organic / non-organic meat, processing facilities for pulses (e.g. cleaning and dehulling), 'dirty kitchens' for preparing vegetables. We would like to see the Plan outline a clear direction of travel towards this which also aligns with the ambitions of the Community Wealth Building Bill.

Food in public settings is often crucial to the health and wellbeing of those receiving it, for example in schools where lunch may be the only balanced meal a child gets that day. We support the call by colleagues at ASSIST FM, amongst others, for the expansion of Universal Free School Meals (UFSM) to be included in the Plan, extending to all Primary and Secondary pupils.

Procurement has wide-reaching impacts across the food system beyond the food on the plate, and we feel the Plan also does not currently include any meaningful indicators regarding worker's rights or animal protection that can be used when procuring food.

On worker's rights, procurement decisions must be weighted to ensure fair work standards, including payment of the real living wage, respect for workers, and workers' voice, expanded trade union recognition, collective bargaining across the sector.

On animal protection, procurement should only include animal products from higher welfare systems. Examples of UK farming practices that should not be supported by public procurement include caging hens and pigs, zero-grazing of dairy cows, and numerous aspects of the intensive systems in which chicken, pigs and salmon are raised. Public procurement should at least avoid these and ideally work towards supporting higher welfare practices such as

'cow-with-calf' farming.

Finally, there is no clear mention in the Plan of the role of planning, e.g. through NPF4, to discourage the proliferation of 'fast food' outlets and advertising for unhealthier food choices.

3 Thinking about the aspects of the Plan on allotments and community growing, what, if any, specific changes would you like to see reflected in the finalised National Plan?

Please provide your response in the box provided.:

We welcome the inclusion and recognition of the value of community growing and allotments, both of which should be encouraged and supported, although we note there is no reference in the plan to market gardens. In recent years markets gardens have been a fast-growing sector, in rural, urban and peri-urban areas. These are highly productive small farm enterprises, often achieving greater levels of production per acre than the average arable farm. Supporting such initiatives would also align with the aspiration of the Community Wealth Building and Wellbeing and Sustainable Development Bills. There is also nothing in the Plan referencing the contribution of allotments and community growing to biodiversity and health outcomes as highlighted in Scottish Government's 2022 'Local Food for Everyone' Plan.

Much more could be done to support community growers to become more commercially viable, including financial investment in the infrastructure needed for upscaling. However, most of these producers, including most of the market gardening sector, fall below the 3ha threshold for receiving Basic Payment Scheme support payments. We join the many organisations calling for a dedicated Market Garden Support Scheme in recognition of the benefits delivered including local food production, food security, short supply chains, community wealth building, gainful employment and environmentally friendly growing practices. This would also align with the aspirations of the Community Wealth Building Bill.

The Plan should reflect the need to build edible horticulture into communities, connecting people and place to the food system and helping to (re)build a vibrant Scottish food culture. To do this the Plan should be vehicle to create and maintain secure access to land for communities in line with the Land Reform Act, the Crofters Act, and National Performance Framework 4, and with planning powers used to deliver on the promises of the Community Empowerment Act.

'Education' is one of the 7 key scopes of the Good Food Nation Act but there seems to be a lack of indicators around how this relates to community growing, for example the number of schools who have or are linked to growing spaces and where does it sit in the curriculum and number of community hubs/anchor organisations supporting and enabling growing.

4 Thinking about other aspects of the Proposed National Good Food Nation Plan (not covered above), what, if any, specific changes would you like to see reflected in the finalised National Plan?

Please provide your response in the box provided.:

As previously states, the cross-cutting nature of the Plans, both National and Local, means there must be much stronger emphasis on the need for effective partnerships between Scottish Government, relevant authorities and with those other organisations best placed to support delivery of the Plans at a food systems level. It's not clear from the current Plan how this will happen but we feel that good practice should be taken from existing food partnership models such as Sustainable Food Places which support nearly 140 partnerships across the UK and is already working across more than half of the 32 LA areas in Scotland. Food partnerships bring together key stakeholders to facilitate collaboration and communication across local, regional and national food systems: from local authorities, health boards, public sector and civil society organisations, to food growers, retailers and the hospitality sector. The Scottish Food Coalition believe that only by taking such a partnerships approach will Scotland be able to achieve its Good Food Nation ambitions.

We want to note our disappointment with the distinctive lack of progress on the Good Food Nation agenda. The Plan does not propose any new actions and targets, neither does it commit to new indicators or areas of policy development. As such, while it is a comprehensive audit of existing policies, it fails to drive action towards a food system transformation we badly need.

Food system transformation has been identified as one of only 6 key levers for achieving Sustainable Development Goals. The first Good Food Nation Plan is a key opportunity to create a whole government approach and deliver not just better food system outcomes, but broader societal changes. At this time, the government has not yet taken this opportunity up.

The lack of progress is particularly concerning in the context of climate change. Emissions from agriculture alone represent around 20% of Scotland's GHG emissions. More concerning, they are not keeping pace with overall emissions reductions, having reduced by mere 12% since 1990. Our net zero targets are mere 20 years – or 4 Plans – away. Given the substantial impact of the food system on climate change, biodiversity and net zero targets we would like to see further scrutiny of these aspects of the Plan by relevant committees.

It is important to ensure that the indicators in the Plan are meaningful, clear and will help to deliver on the Good Food Nation ambition. There are missing opportunities to create indicators using existing data, whilst at the same time others are confusing. For example, is the indicator on Atlantic salmon suggesting production from farming salmon should increase and if so, how does this relate to becoming a Good Food Nation? Or does it suggest, as might be read given it's placing in the Plan, that increasing production is a good thing for wider biodiversity which of course we know it isn't? Focusing only on Atlantic salmon production volumes - without considering the number of fish or the well-documented animal welfare and environmental impacts, including pressure on wild fish populations for feed, falls short of a comprehensive or robust Good Food Nation indicator for aquaculture farmed fish seafood. Additionally, the Sustainable Fishing Indicator (SFI), currently the only metric for wild-caught fish and shellfish, is overly high-level and focused solely on stock status. It fails to distinguish the varying impacts of different fishing methods on marine habitats, making it inadequate for assessing progress toward the prioritization of low impact and sustainable fishing practices over time.

Wherever possible local authorities and health boards should be strongly encouraged to use same metrics in their Local Good Food Nation Plans as in the

National Plan - this will help facilitate learning across Scotland and allow for the most effective tracking of progress towards becoming a Good Food Nation.

Finally, we strongly call for the indicators relating to the environmental impact of food production to extend beyond the use of nitrogen fertilisers to other artificial inputs such as chemical pesticides, which are one of the key drivers of biodiversity loss and are detrimental to human health. The addition of an indicator on reducing the use of harmful pesticides would be in line with the Scottish Government's ambition to increase the amount of land farmed organically, and to address biodiversity loss and restore nature. Additionally, whilst 'sustainability' is often talked about in the Plan there is no specific mention of circular and zero waste and wellbeing approaches within the food system.