

City of Edinburgh Council's response to the Good Food Nation National Plan Consultation – Spring 2024

[Link to the online overview of the consultation](#)

Question 1: Does each individual Good Food Nation Outcome describe the kind of Scottish food system you would like to see?

Outcome 1 Everyone in Scotland eats well with reliable access to safe, nutritious, affordable, sustainable, and age and culturally appropriate food.

Response: Strongly agree

Outcome 2 Scotland's food system is sustainable and contributes to a flourishing natural environment. It supports our net zero ambitions, and plays an important role in maintaining and improving animal welfare and in restoring and regenerating biodiversity.

Response: Strongly agree

Outcome 3 Scotland's food system encourages a physically and mentally healthy population, leading to a reduction in diet-related conditions.

Response: Strongly Agree

Outcome 4 Our food and drink sector is prosperous, diverse, innovative, and vital to national and local economic and social wellbeing. It is key to making Scotland food secure and food resilient, and creates and sustains jobs and businesses underpinned by fair work standards.

Response: Strongly Agree

Outcome 5 Scotland has a thriving food culture with a population who are interested in and educated about good and sustainable food.

Response: Strongly Agree

Outcome 6 Scotland has a global reputation for high-quality food that we want to continue to grow. Decisions we make in Scotland contribute

positively to local and global food systems transformation. We share and learn from best practice internationally.

Response: Mostly agree

Question 2: What, if anything, would you change about the Good Food Nation Outcomes and why?

Outcome 1 should make explicit reference to ease of access to food, as well as the reliability of access e.g. “Everyone in Scotland eats well with easy and reliable access to...”. This would better reflect the plan’s recognition that time is a factor in people’s ability to access food. Shops in the local area with good quality, nutritious, affordable food are critical to delivering a good food nation and supporting wider health benefits by enabling people to easily walk, wheel or cycle to access healthy, nutritious food.

The FAO definition of a sustainable food system used within Outcome 2 is very human-centric. Arguably under this definition a future in which all foodstuffs are artificially pollinated (due to the loss of natural pollinators) could still be considered sustainable as long as the human population could be fed. The definition should reflect the inherent value of biodiversity beyond its role in feeding humans. The definition of a sustainable food system should therefore be clarified to make it explicit that the food system actively enhances rather than diminishes Scotland’s biodiversity.

There is a definite interrelationship between animal welfare, a flourishing natural environment and emissions from food production and this should not be overlooked. However, animal welfare merits an outcome of its own. This should include the welfare of creatures raised through aquaculture, as well as land-based farming practices. Additionally, climate change is likely to result in an increased risk from pests to crops and livestock. Any measures implemented to deal with this increased risk must be sensitive to the ongoing nature emergency and not undermine efforts at nature recovery.

The plan makes no mention of the emissions produced from food consumed in Scotland. The focus is very strongly on the emissions from

food production. Production emissions are significant, but a notable proportion of the food consumed in Scotland is not produced here. Food consumption emissions are relevant to both outcome 2 and 6. Further work is likely to need to be undertaken to develop datasets and indicators on Scotland's food consumption emissions. However, as the Good Food Nation National Plan acknowledges, it will take longer than one cycle of the plan to deliver on the outcomes. Therefore, a lack of available data at this stage should not preclude reducing emissions from food consumed in Scotland being reflected in the plan's outcomes,. Furthermore, while the plan refers to the Scottish Dietary Goals, the plan should be more explicit that changes to the typical Scottish diet, including reducing the overall levels of meat consumed, are required to reduce the emissions impact of food consumed in Scotland.

Question 3: Do you think that these targets will contribute to achieving the overall Good Food Nation Outcomes? ([National Good Food Nation Plan Targets, Indicators and Measures](#))

Response: Mostly Agree

Question 4: Would achieving these targets contribute to making the kind of Scottish food system you would like to see?

Response: Mostly Agree

Question 5: If you have other comments on the suggested Good Food Nation targets, please comment:

It is positive that the plan sets out what the Scottish Government would like to achieve and how progress will be tracked. However, what is set out appears to be a mixture of statements, commitments, funding and measures with specific targets. The vagueness of the targets means it will be less clear as to when they have been achieved and therefore to meaningfully assess the impact of the targets against the outcomes. While the directional targets are helpful, timebound targets (phased as

required) would help to give a sense of priority and milestones for the plan to be working towards.

Question 6a: Do you think these indicators will be useful for measuring progress towards the Good Food Nation Outcomes?

Response: Mostly Agree

Question 6b: Why or why not?

Response:

It is helpful that the plan sets out the difference between goals, targets and indicators. However, few of the targets or commitments that follow are particularly specific. For example, with regards to the childhood obesity target, diet related inequalities need to be clearly defined. Without knowing the definition Scottish Government is considering, it is not possible to comment on whether these diet-related inequalities can be clearly distinguished from wider inequalities.

Local authorities should be directly involved in the setting of any public procurement targets if they will be applicable to us.

Question 7: What other indicators, if any, would you like to see included?

Response: For the first iteration of the national plan, the City of Edinburgh Council would broadly favour not adding any additional indicators to those already listed. This will enable all parties to establish consistent approaches to data collection and ensure there are clear, shared definitions which result in consistent data across Scotland. Any lessons learned could then be applied to an expanded future list of indicators. Resource will be required for all partners to manage data collection on an ongoing basis.

There are two exceptions to this:

- Number of households in unsuitable temporary accommodation where cooking facilities might be limited. As this data already exists, this should be deliverable.
- Dental health is crucial to a good food nation but is not included in the plan. In discussion with NHS colleagues and their ability to provide the necessary data to report on this indicator, an indicator on levels of access to NHS dental care OR an indicator of dental health should be included within the plan.

At the next iteration of the plan, it would be worth exploring the possibility of qualitative indicators to support tracking progress on Outcome 1 for example. Further thought and discussion would be required on what the indicator could be and how it could be effectively tracked.

Dependent on the lessons learned during the first iteration of the plan, further indicators that could be considered in due course are:

- The uptake of free school meals, as the current indicator covers paid AND free school meals
- An indicator such as referral for Scottish Welfare Fund. It is important to track need/demand for emergency food. The proposed indicator for tracking this (the reported number of households accessing emergency food) could be artificially reduced if access to emergency provisions declines. For example, this might happen as a result of funding pressures leading to the closure of emergency food provision services.
- An indicator that tracks food consumption emissions in Scotland, as well as food production emissions.

Question 8: If you have other comments on the suggested Good Food Nation indicators, please comment:

There are a notable number of measures per outcome. It would be helpful if tables 2.1-2.6 included two additional columns that clearly indicated if this is a new or existing indicator, where this data is already gathered and how it will be collated centrally. This would help public

bodies to be clear if any additional asks are being made of them to fulfil the reporting on indicators and targets and understand any resource implications. Additionally, this could improve data consistency across local authority Good Food Nation Plans. In general, clear definitions will be required to ensure consistency of data across Scotland.

Audit Scotland's recent report recommended mandatory scope 3 CO₂e emissions reporting for Scottish Government and public bodies within Scotland. Food would form part of these emissions. If the Scottish Government accepts this recommendation, there is a need for an agreed, standardised methodology to cover this aspect of reporting. This is an area that Good Food Nation Living Lab or the Climate Intelligence Service could be well placed to support public bodies with. More broadly, the living lab represents a real opportunity to develop effective indicators as part of an overall approach to systems learning.

Monitoring the numbers of people accessing emergency food provision is also a challenge as provision is wide and varied.

Question 9a: [Snapshot Box: As a child in a Good Food Nation](#) - Does this reflect what you think life should look like for a child in Scotland as a Good Food Nation?

Response: Mostly Agree

Question 9b: What changes, if any, would you make?

Response: Add a statement to the list that covers knowledge and choice. For example, "I know what's good for me and I regularly choose these options". Additionally, the list of educational learning opportunities could be expanded to include food waste reprocessing plants alongside farms.

Question 10a: [Snapshot Box: As a parent/carer in a Good Food Nation](#) - Does this reflect what you would like your life to look like, as a parent/carer in a Good Food Nation?

Response: Mostly Agree

Question 10b: What changes, if any, would you make?

Response: There may be several barriers to overcome for parents to access healthy and sustainable food. These include time and the need to fit shopping and cooking around working hours, as well as exhaustion and stress arising from delivering informal care. The statement should therefore reflect ability, for example “I am empowered and able to...”.

The statement “I know where to go for support should I experience difficulties that prevent me from purchasing food or preparing hot food at home” is a bit oblique with regards to the challenges unpaid carers might face and the support they may need in that role to access hot food. It is important that this statement therefore reflects a wider range of individual’s experiences and isn’t read to mean financial difficulties alone.

Question 11a: [Snapshot Box: As an adult in a Good Food Nation](#) - Does this reflect what you would like your life to look like, as an adult in a Good Food Nation?

Response: Mostly Agree

Question 11b: What changes, if any, would you make?

Response: As per Question 9, add a statement about knowledge and choice (“I know what’s good for me and I regularly choose these options”)

Question 12a: [Snapshot Box: As a public caterer in a Good Food Nation](#) - Does this reflect what you would like your life to look like, as a public caterer in a Good Food Nation?

Response: Strongly Agree

Question 12b: What changes, if any, would you make?

Response: No changes

Question 13a: [Snapshot Box: As a retailer in a Good Food Nation](#) - Does this reflect what you would like your life to look like, as a retailer in a Good Food Nation?

Response: Mostly Agree

Question 13b: What changes, if any, would you make?

Response: Minimising food waste is a good thing, though unlikely to be eliminated completely. As part of a circular and sustainable economy it is vital to look at what can happen to whatever level of waste remains to ensure it does not just go to landfill.

We are not a retail business but from our continuous engagement with retail businesses, our understanding is that support mechanisms should be put in place to ensure and enable any food waste to be diverted e.g. to those in food poverty where possible, composting, etc. That point could read:

Decisions I make in store and through procurement help Scotland to achieve its net zero ambitions, for example by minimising food waste *and enabling support for remaining waste to enter the circular economy; and in ensuring minimal food packaging is used and that any packaging is fully recyclable.*

There is a lot of responsibility and assumed knowledge being placed on the retailer in delivering the ‘snapshot’. It is vital to understand the business and financial support required to encourage and support retailers in working towards this. Where necessary adequate and funded support should be available to offer programmes for retailers and their staff to increase knowledge of nutritional quality, and what the healthy options are that they would be expected to share with customers.

Additionally, from our engagement with existing retailers who are transitioning to net zero and providing more sustainable and healthy food options, they are finding current trading challenging as consumers go back to less sustainable but cheaper options from larger retailers such as supermarket and discount chains. Such retailers have fed back that they should receive adequate support to ensure their efforts towards net zero and sustainability are supported and rewarded.

Other questions in the consultation (fisher/crofters) snapshots specifically refer to the support available to them, or that they can access. This should be reflected consistently across all the snapshots across different business areas and so there should be an additional point added to ensure that retailers are also supported, which aligns with our ongoing engagement with these businesses:

- *I have access to a business support network that provides me with the advice, guidance, and financial support I need to be an effective Good Food Nation retailer and I am supported in the decisions I make towards achieving this.*

Question 14a: [Snapshot Box: As a restaurant owner in a Good Food Nation](#) - Does this reflect what you would like your life to look like, as a restaurant owner in a Good Food Nation?

Response: Mostly Agree

Question 14b: What changes, if any, would you make?

Response:

We are not a restaurant business but from our continuous engagement with restaurant businesses our understanding is that, to ensure fresh, seasonal produce can be sourced, delivered, and supplied consistently, restaurants say that more support is required towards developing more suppliers from the local food economy. This would substitute for and counteract the increasing time it takes for imported goods to reach wholesalers and restaurants or are no longer available, or in having to source alternative, more expensive options.

Other questions in the consultation (fisher/crofters) snapshots specifically refer to the support available, or that they can access. This should be reflected consistently across all the snapshots across different business areas and so there should be an additional point added, which aligns with our ongoing engagement with these businesses:

I have access to a business support network that provides me with the advice, guidance and financial support I need to be an effective Good Food Nation retailer and I am supported in the decisions I make towards achieving this.

Minimising food waste is a good thing, though unlikely to be eliminated completely. As part of a circular and sustainable economy it is vital to look at what can happen to whatever level of waste remains to ensure it does not just go to landfill. Support mechanisms should be put in place to ensure and enable any food waste to be diverted e.g. to those in food poverty where possible, composting, etc. Our engagement with these businesses shows that they would like to dispose of their waste in innovative ways but mechanisms to support this are not always there, and previous funding and support that was available has ended.

Question 15a: [Snapshot Box: As a farmer/crofter in a Good Food Nation](#) - Does this reflect what you would like your life to look like, as a farmer/crofter in a Good Food Nation?

Response: N/A

Question 15b: What changes, if any, would you make?

Response: As we are not farmers/crofters we have not responded to the first part of this question, however we strongly support the inclusion of Fair Work principles.

Question 16a: Snapshot Box: As a fisher in a Good Food Nation - Does this reflect what you would like your life to look like, as a farmer/crofter in a Good Food Nation?

Response: N/A

Question 16b: What changes, if any, would you make?

Response: As we are not fishers we have not responded to the first part of this question, however we strongly support the inclusion of Fair Work principles.

Question 17a: [Snapshot Box: As a food processor in a Good Food Nation](#) - Does this reflect what you would like your life to look like, as a food processor in a Good Food Nation?

Response: Mostly Agree

Question 17b: What changes, if any, would you make?

Response: We are not a food processing business but from our continuous engagement with food processing businesses our understanding is that minimising waste is a good thing, though unlikely to be eliminated completely. As part of a circular and sustainable economy it is vital to look at what can happen to whatever level of waste remains to ensure it does not just go to landfill. Support mechanisms should be put in place to ensure and enable any food waste to be

diverted e.g. to those in food poverty where possible, composting, etc. and that support is offered in helping make food and transport packaging be fully recyclable.

There is no mention of Fair Work here, only on 'investing and developing my workforce' so would query why this has been missed out here. Fair Work is still important and that point should read:

As an employer, I meet Fair Work First criteria. I invest in and develop my workforce, ensuring they can enjoy opportunities to enhance their skills whilst benefitting from a safe working environment.

Other questions (fisher/crofters) snapshots specifically refer to the support available, or that they can access. This should be reflected consistently in the snapshots across all different business areas. This support also translates into developing the workforce and includes links to schools and FE/HE institutions to recruit from and to develop their workforce and so final point should be adapted, which aligns with our engagement with such businesses:

I contribute to the important role that the food and drink sector has in Scotland's economy and can access a business support network that offers advice, guidance and financial support to help me be more effective in that role.

Question 18: If you have any further comments on the national Good Food Nation Plan, please comment here:

Policies and Delivery Mechanisms for the Good Food Nation national plan – further action required

The consultation focuses very strongly on the plan's outcomes, indicators, and targets, with little asked on the delivery mechanisms proposed to support the plan. While the plan explicitly acknowledges that the outcomes are ambitious and will take longer than one plan cycle to deliver, the plan does not include any new policies or programmes to drive this agenda forward. Nor does the plan provide an indication of

how far the existing policies and programmes listed within it will take Scotland towards the outcomes. To drive forward delivery on the outcomes in the plan the following additional policies and programmes should be considered:

Address wider barriers to food poverty

The Council supports the Scottish Government's human rights-based approach to food insecurity. Alongside progressing the cash first approach, wider consideration needs to be given to the barriers to accessing food. This includes aspects such as ability to store food if you don't have access to a fridge, freezer or a suitable kitchen for cooking. A lack of accessible language and knowing where to look for support are also barriers to accessing help. The national plan should link to the national digital inclusion strategy and more generally encourage and support public sector partners to consider wider accessibility practices.

The Good Food Nation national plan should establish best practice nationally to support destigmatised access to food for whole families.

Cooking skills for adults

The plan recognises the importance of teaching children to cook, along with the need to upskill the workforce across the food sectors. However, the plan's policies and programmes do not seem to recognise that a lack of cooking skills and confidence is a barrier for some to produce affordable and healthy home-cooked meals. This includes knowledge and in some cases ability, to store cooked food safely. Policies and programmes to support a national dietary shift towards the Eatwell Guidance need to address these wider barriers.

Implementing a national approach to carbon labelling for food

Carbon labelling tools for menus already exist and are being used in different public and private sector settings in Scotland. Carbon labelling has also been introduced in various settings abroad. Drawing on evidence on the effectiveness of this approach, the plan should explore a national rollout of carbon labelling on meals served across the public and private sector in Scotland.

National communications to encourage a shift to healthier, more sustainable diets that are accessible to all

The plan only mentions a comms campaign, led by Scotland Food and Drink, to boost Scottish food exports. A wider educational campaign should be considered, that covers:

- providing communities with resources on how to reduce meat consumption healthily and affordably. Messaging could be tailored appropriately to Scotland's different communities so all proposals are inclusive.
- National comms should also consider how best to destigmatise access to food
- Buying local

Extending the 'Food for Thought Education Fund' to expand food growing opportunities in schools

The plan rightly recognises the role that education and the Curriculum for Excellence has in supporting and influencing how Scotland's next generation engage with the food system, both as consumers and potential producers. As part of this education, the plan could explore making further resources available so that outdoor food-growing becomes widely available within schools and does not have to be traded off against wider food-related educational activities.

Enabling Compulsory Purchase Orders (CPOs) to be used to open up land for food growing projects

The national policy environment should encourage innovative ways to increase access to growing. This could include making clear that the use of CPOs by local authorities to open up land for community food growing is a legitimate use of this legal power.

Deliverability of existing Scottish Government policy, as it relates to local authorities

National Planning Framework 4

The plan states that NPF4 enables proposals for hot food takeaways and permanently sited vans to be refused should provision undermine the health and wellbeing of communities. At present the Council enacts

restrictions on Hot Food takeaways in areas with an essentially residential character, where there are already a high concentration of hot food takeaways, public houses and entertainment venues. These restrictions are set out in the Council's [Guidance for Businesses](#). At this time it is unclear what data is available to the Council as Planning Authority to make a judgement on the overall health and wellbeing of communities and **enact a restriction on this basis.**

Forthcoming regulations on promoting high salt, fat and sugar foods

The Council welcomes the parallel consultation on the Scottish Government's potential plans to regulate the promotion of foods that are high in salt, sugar and fat. There is currently a national shortage in environmental health officers and any increases to workload for these departments needs to be supported by national investment in training to fill the existing workforce gap.

Relatedly, a national conversation needs to be had on a minimum price for sugar to support population health outcomes. This needs to also take into account any unintended impacts of food price increases to ensure those already at a disadvantage are not further impacted.

Climate adaptation and the Good Food Nation National Plan

Whilst the plan mentions climate adaptation, the focus appears to be on supporting producers adapt. This is critically important, however, the Good Food Nation Plan and the Scottish Climate Change Adaptation Programme should also consider the resilience of the food system in the face of climate change related extreme weather events. Adaptation is required not just by producers, but also for food processors. **For example, if peas produced in Scotland have to be transported to England for processing prior to sale to consumers back in Scotland, this reduces the resilience in this supply chain. This makes it more vulnerable to disruption from extreme weather events.**

Thought should also be given on how communities can be supported to equitably access food during extreme weather events. Professor Tim Lang's (Professor Emeritus of Food Policy at City, University of London's Centre for Food Policy) forthcoming report on civil food resilience in the face of collective shocks could provide some interesting learnings.

Lessons from other countries could be incorporated into the GFN national plan on increasing community resilience in the face of disruption to the food system. Relatedly, whilst Scotland does not control trade agreements, consideration should be given to how dependent Scotland's food supply is on climate vulnerable countries. This includes a notable proportion of fruit and vegetables, which the plan acknowledges we need to boost consumption of in the plan (Scottish Dietary Goals). Consideration should be given to not just helping producers adapt their existing produce, but also consider how additional or different produce may both be possible and required in future in Scotland.

There are implications and risks from climate change for parts of the food system that rely on Scotland's sea and coastal environments. Future heavy rainfall on land needs to be sufficiently planned for and accommodated so as to avoid an increase in emergency releases of raw sewage into Scotland's coastal waters. Any increase in coastal water pollution threatens to undermine the health and safety of coastal food production. Given the plan's cross-legislative nature, it should recognise these complex interlinkages and risks.

Similarly, the plan highlights interlinkages with Scotland's Vision for Aquaculture. The latter should take account the role of Scotland's seas in mitigating and adapting to climate change, as well as producing food and fostering biodiversity within them. For example, seagrass has incredible potential for capturing carbon. Seagrass forests also reduce the power of waves and therefore help to limit coastal erosion. Any plans for fishing and seafood production also need to consider the wider potential of the sea and support all these functions.

Food Waste

The Council has also responded to the Scottish Government's consultation on the Circular Economy Bill. Depending on timings, the actions and programmes on food waste as part of the circular economy bill should be clearly articulated in the Good Food Nation Plan. More emphasis is needed on supporting households to prevent avoidable household food waste.

National legislation should also look at best practice from other Countries to tackle business food waste. For example, in France unsold food has to be donated rather than thrown out.

Fair work and Fair trade

The plan rightly focuses strongly on fair work conditions within the food production, processing and retailing sectors in Scotland. As a Fairtrade city, Edinburgh would also encourage the plan to recognise the importance of fairtrade or similar status products to ensure fair work conditions globally.

Resourcing and delivering Local Authority Good Food Nation Plans

The Good Food Nation Act makes clear that, following the finalisation of the national plan, Local Authorities will have a duty to produce their own plan within 12 months. As yet, it is unclear what level of funding from Scottish Government will accompany this additional duty on local authorities. This funding is critical for local authorities to have the capacity to produce a plan that is truly meaningful and impactful.

The timing of this funding is also important – 12 months is already a tight timeframe to draft, publicly consult on a plan and achieve local political sign-off, without losing potentially 3 months' to the recruitment process to bring in the necessary resource to deliver this work.

Whilst the duty to have a plan falls on local authorities and health boards, many of the required programmes of work to deliver on the outcomes will require effective partnership working at the local level. Building effective relationships will therefore be essential to deliver the most impactful plan. Once again, the Council is unable to invest significant resources into meaningfully building these partnerships until Scottish Government funding to accompany this duty is made available.

Interrelationship between duties on Local Authorities

As iterated in the City of Edinburgh Council's response to Scottish Government's consultation on the Human Rights Bill, the Council supports the inclusion of the Right to Sustainable Food and a right to a healthy environment. The Council however seeks clarity on the interaction between the duties placed on local authorities for Community Wealth Building, producing a Good Food Nation Plan and

how the rights proposed under the recent Human Rights Bills are likely to impact on the work that is undertaken by local authorities in practice.

Question 19: Please let us know if we have missed any function falling within a specified description or relevant specified functions in the list.

Response: The Waste (Scotland) Regulations 2012 should be added to the list of existing specified functions

Question 20: Why do you think this specified function/function falling within a specified description should be added?

Response: Changes to these regulations will likely be required under the Circular Economy Bill and in doing so, should support the following Good Food Nation function: “The consideration of the environmental impact (including mitigation of, and adaptation to, climate change and the halting and reversing of biodiversity loss) in the management of food waste”.
