

Consultation:

Scottish Government – Good Food Nation Proposals for Legislation

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Summary

- We strongly support the placing of a requirement on Scottish Ministers to publish a statement of policy on food, along with indicators of success. These statements should help to ensure that policy is aligned and focused on the same priorities across different government portfolios. The indicators to measure success should be developed transparently and reflect consumers' priorities.
- Rather than reporting on progress every two years, there should instead be a requirement for annual reporting of progress against the policy statement.
- We agree that this approach should also apply to relevant public bodies and that there should be a legal requirement for public bodies to co-operate in the delivery of the food policy, taking into account the agreed indicators.
- While a new statutory body should not be necessary to over-see the Good Food Nation policy, further consideration should be given to the institutional mechanisms needed to ensure effective co-ordination across government, public bodies and wider stakeholders.

Introduction

Which? welcomes this opportunity to comment on the Scottish Government's proposals for legislation, as part of its wider commitment to becoming a Good Food Nation. We recognise that delivering on the Good Food Nation commitments will require a broad range of actions that go beyond legislation by a wide range of actors, including government and public bodies, but also the food industry and civil society groups.

It is important that there is an aligned approach with clarity and commitment to delivering against the same priorities across government and public bodies. Different parts of

government can have potentially conflicting short and long-term interests in relation to food but it is essential that they are aligned on tackling the key challenges that underpin the policy.

A published national food policy alone is not enough. The National Food and Drink Policy, *Becoming a Good Food Nation* was, for example, published in 2014. Food policy requires a long-term commitment and therefore we agree that key elements need to be enshrined in legislation in order to give the policy the prominence and cross-government buy-in that is needed to ensure that it will be delivered. Transparent and regular reporting against its delivery is also essential.

Consultation questions

Framework Legislation:

1. 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?

Agree

We support the overall approach proposed, which would place requirements on Ministers, as well as public bodies, to publish a policy statement on food, have regard to this in the way they exercise their functions and report on how this is delivered, as well as international commitments (eg. the International Covenant on Economic, Social and Cultural Rights).

This should help to ensure that there is agreement across government on the priorities that all policies should be working towards – and that there is clarity among Ministers as to how their portfolio needs to be focused in order to deliver a Good Food Nation.

The statements should include food production and consumption issues relating to, for example “the growing, harvesting, processing, marketing, sale, preparation and consumption of food, and disposal of waste arising from this; and access to affordable, local, nutritious and culturally appropriate food, and food in the public sector.” As stated in the consultation, particular account would need to be taken of the implications of Brexit, including in relation to the rights, well-being and food security of the general public. Crucially, the statements need to be complimentary and focused on the same over-arching goals.

The indicators will need to enable progress against the key challenges of ensuring a food system that delivers healthy, sustainable and affordable choices to be measured, as well as consumers’ wider priorities. The consultation process for the development of these indicators will be very important and is an opportunity for wider engagement of consumers across Scotland.

It is proposed that Ministers report on progress every two years. However, we think that annual reporting is more appropriate and will give a stronger sense of the priority that the Scottish Government places on this policy and a joined up approach.

2: Whilst we do not plan to require all sectors to prepare statements of policy on food, they do all have a role to play in achieving our Good Food Nation ambition. To what extent do you agree that Government should encourage and enable businesses in particular to play their part?

Agree

It is important that all stakeholders are engaged in delivering the Good Food Nation policy and businesses are a key part of this. The monitoring framework therefore needs to be able to reflect the extent to which they are engaged and helping to deliver on the indicators that will be developed. Mechanisms for co-ordination and engagement of all stakeholders also need to be in place.

Oversight of the Good Food Nation Policy Area

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

Agree

Specified public bodies, as well as Ministers, should be required to publish a statement of policy. As with Ministers, annual reporting is more appropriate than every two years.

We agree that the legislation should include specific requirements for Ministers and public bodies to collaborate in order to ensure a joined up approach to the delivery of the Good Food Nation proposals.

Although it may not be necessary to establish a statutory new body, formalised institutional and co-ordination arrangements will need to be in place to ensure that there is cross-government and cross-stakeholder collaboration and monitoring of progress against the indicators.

Other provisions

4: 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?

Agree

Targeted legislation is likely to be more appropriate alongside these general requirements to ensure that the government and Ministers are clear about priorities and that there is a framework for monitoring progress and ensuring collaboration. This should however be kept under review.

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