

Good Food Nation Consultation response

Response from Friends of the Earth Scotland – March 2019



About Friends of the Earth Scotland

Friends of the Earth Scotland exists to campaign, with partners here and across the globe, for a just transition to a sustainable society. We work in Scotland for socially just solutions to environmental problems and to create a green economy; we campaign to end the degradation of our environment and to create a society which cherishes and protects the natural world on which we depend; we think globally and act locally, enabling people to take individual and collective action. We are part of Friends of the Earth International - the world's largest grassroots environmental network, uniting 75 national member groups, over 2 million members and 5,000 local activist groups around the world. We are an independent Scottish charity with a network of thousands of supporters, and 10 active local groups across Scotland. Friends of the Earth Scotland's vision is of a world where everyone can enjoy a healthy environment without exceeding their fair share of the planet's resources, now and in the future.

Answers to consultation questions

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 – it is important for Ministers and the public sector to have strong policies on food, combined with good delivery mechanisms and reporting duties that monitor and improve progress. A particular aim should be for a food system which minimises the contribution to climate change and reduces dependence on artificial chemical inputs. The statements of policy should make clear how they are contributing to the public sector duty to help deliver Scotland's climate targets contained in the Climate Change (Scotland) Act 2009. The statements of policy should include or be accompanied by a detailed plan which includes time-bound targets.

The process of developing policy should be inclusive of a wide range of stakeholders, since the food system affects everyone.

We support the introduction of a stronger legal footing for the right to food however there is currently no commitment to or timescale to progress the possible Scottish Human Rights Bill, so the right to food should be enacted in this Good Food Nation legislation.

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 – food-related businesses are obviously key in changing our food system to create a Good Food Nation. Businesses can be the source of much of the innovation that transforms our food system. This needs a carrot and stick approach, incentivising positive change and progressively closing off business practices which are negative.

However, we do not agree that these kind of duties to produce statements of policies should not apply to private food-related businesses. Alongside information, incentives and encouragement, strong policies and enforcement are needed to ensure the private sector is also moving in the right direction.

The Scottish Government needs to properly fund our research institutes, which are the other vital source of innovation in the food system.

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

Disagree – reporting by public bodies under the Climate Change (Scotland) Act 2009, which has now become mandatory, has made very little difference to the actual performance of the public sector on climate emissions. We therefore do not think that public bodies simply reporting to Ministers will be sufficient. Ministers could be required to report on public bodies' action to Parliament but on balance we think an independent, statutory scrutiny body would be the best way to ensure that the relevant range of expertise is focused on progress both by Ministers and public bodies.

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?

Neither agree nor disagree - the distinction between a framework Act and one which delivers directly is rather artificial. As with most primary legislation, this Act should set the framework, including setting overall targets, enable future follow-up primary and secondary legislation but also include specific provisions for actions which need to be taken soon and for which the implementation route is clear, for instance on reducing the climate change impact of the food system by setting and enforcing nitrogen use efficiency targets.

As we state in the answer to question 1, the right to food should be included in this legislation, after all this right sets the framework under which this and future legislation should deliver.

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