

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

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.

Strongly agree

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

Mostly agree

Outcome 4: Our food and drink system 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

Mostly agree

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

Mostly disagree

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.

Mostly agree

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

We broadly welcome the Outcomes in the Plan and the topics and issues they address. We'll address each of the Outcomes we wish to comment on in turn below.

Outcome 1

It is welcome that Outcome 1 includes nutritious and sustainable food. This is important as it moves commitments beyond simply 'adequate food' which is what has been committed to in previous policies.

In addition to reliable, we would also like to see some reference to affordability within the Outcome as a recognition that cost is one of the main barriers reported to accessing healthy and nutritious food.

Outcome 2

We support this Outcome and welcome its inclusion within the Plan. Achieving net zero is an important ambition for Scotland's food system and our National Good Food Nation Plan should support this.

Outcome 3

It is welcome that Outcome 3 is included, in particular the inclusion of both physical and mental health, and the recognition of the importance of diet in influencing these. However, we feel there are several areas where the Outcome could be improved.

We disagree with use of the word 'encourage' in the Outcome. The food system must do more than simply encourage a physically and mentally healthy population. Additionally, encourage continues to place the onus on individuals and individual-level actions, by suggesting it the responsibility of individuals to make the right decisions, without accounting for the wider context in which those decisions are being made. If we are to achieve the necessary changes we need to see to achieve this Outcome, the food system must as a minimum facilitate or enable a physically and mentally healthy population, through policies which make accessing healthy and sustainable food easy and affordable for everyone. We would therefore like to see the Outcome updated to say enable or facilitate, rather than encourage.

The Outcome could be improved by adding specific mention of weight. For example, there is scope in this Outcome to make an explicit connection between diet-related outcomes (currently mentioned in the Outcome) and weight (not currently mentioned). It's important that weight outcomes, such as obesity, are recognised here, given the clear link between diet, health, and weight.

There is also no mention of prevention within the Outcome. This is a significant omission. Prevention is critical to improve population health and wellbeing, and evidence shows the most effective policy actions that can be taken in relation to the food system to improve the food environment are those focused on prevention¹. When discussing prevention, there is a need to ensure the focus is not on policies and programmes which centre on the individual/individual agency but instead is on those which are focused on addressing the systemic issues and wider determinants of health, including social, economic, environmental, and commercial determinants which we know from evidence are among the main drivers of these poor health outcomes. The need for a whole systems approach to food and health should be recognised in the Outcome.

Outcome 4

We acknowledge that the food and drink system, its businesses and workforce underpinned by fair work standards, should be prosperous, diverse, innovative, but with the proviso that innovation and incentives are orientated toward healthy, nutritious, and reasonably priced food. Rebalancing of the food industry in this way would then contribute maximally to national and local economic and social wellbeing. There is a risk that maximising the production and availability of foods that are high in fat, sugar and salt would have the opposite effect.

Outcome 5

We mostly disagree with this Outcome, due to its focus on education.

We feel the Outcome is framed to suggest that the sections of the population who are not educated about food simply need to be better educated on making healthier food choices. We strongly contest the basis of this underlying assumption, as evidence shows that education campaigns and initiatives alone do little to improve population health outcomes and improve diets, as they do not address the underlying causes and determinants of diet, health, and weight outcomes.

¹ Pineda, E et al (2022) Policy implementation and priorities to create healthy food environments using the Healthy Food Environment Policy Index (Food-EPI): A pooled level analysis across eleven European countries. The Lancet, vol 23: 100522, <https://doi.org/10.1016/j.lanepe.2022.100522>

Evidence shows there are high levels of knowledge and understanding with regards to healthy eating among the population, but it is wider factors, principally the high cost and lack of access to healthier food, that prevents people from eating a healthy diet. For example, if we look at the 5-a-day campaign, data suggests that whilst as many as 85% of adults are aware of the messaging that they should be eating at least 5 portions of fruit and vegetables per day, only around a third of adults actually achieve 5 a day. The primary reasons identified for this were availability and accessibility of healthy food, principally physical availability, and price². Continuing to focus on education campaigns will not achieve the level of change required to improve population health and shouldn't be a focus of the National Good Food Nation Plan. The primary focus must be on action to address the wider structural determinants of health and improving the food environment, with education campaigns being a secondary focus (only after the former has been delivered).

In terms of the focus on education, it is unclear from the document whether this means a need for more education overall, or whether as an individual you need to be more educated. It should be clarified within the Plan which one it is, as this will influence the approach taken.

This Outcome should be amended to acknowledge that education should only be delivered as part of a wider programme of interventions that address the wider structural factors influencing health and weight outcomes. It shouldn't be the sole focus of interventions and policies.

Outcome 6:

High-quality food is a fundamental element of good nutrition, but it must be nutritious and contribute to overall improvement in physical and mental wellbeing. Enabling a thriving food system that produces more highly processed food that is high in fat, sugar and salt may be of high quality, but it does not contribute to better population health. We agree with this outcome to the extent that Scotland should engage fully in efforts to develop food systems that ensure high quality, reasonably priced and widely available, healthy, and nutritious food for the whole population. Other countries will have made strides to achieve this objective. In that sense, Scotland must learn from best practice internationally.

General comments

It is positive that the Outcomes in the Plan are linked to the human rights agenda in Scotland and the Human Rights Bill. However, the Bill outlines a requirement *to have regard to* the right to food, for example. We do not believe that the expression is strong enough to deliver on this right. Related to this, page 10 of the Plan outlines that relevant authorities are required *to have regard to* the content of the Plan in relation to food policy decisions. As with the Human Rights Bill, we do not feel *have regard to* is strong enough to ensure that the content of the Plan will be properly considered or form the basis of decisions. The language needs to be strengthened to ensure this happens.

We acknowledge and welcome the reference to the UN Convention on the Rights of the Child (UNCRC) in the National Good Food Nation Plan. It is vital that children and young people's rights and wellbeing is at the forefront of any measures being taken by the Scottish Government. We would like to see a specific reference to children and young people within the outcomes that recognises the unique challenges they face in accessing healthy and nutritious food. In order to achieve this, the Scottish Government must consult with children and young people and ask what they want from a National Good Food and the National Plan.

² Food Foundation (2023) Education and Information. How important are educational interventions as a tool for improving healthy diets? https://foodfoundation.org.uk/sites/default/files/2023-09/TFF_Education_briefing.pdf

Question 3 – Do you think that these targets will contribute to achieving the overall Good Food Nation Outcomes?

Mostly agree

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

Mostly agree

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

Our comments relate to the following targets in the Plan:

- halve childhood obesity by 2030 and significantly reduce associated diet-related inequalities
- increase levels of adult healthy weight
- reduce adult diet-related health inequalities
- reduce the number of households facing moderate to severe food insecurity

These targets feature under Outcomes 1 and 3. It's welcome that explicit targets on diet and healthy weight have been included within the Plan, and points to a recognition of the central role that our food system plays in determining population diet and healthy weight outcomes. We particularly welcome that the Scottish Government ambition to halve childhood obesity by 2030, first outlined in the 2018 Diet and Healthy Weight Delivery Plan³, has now been formally recognised as a target, and further extended to include significantly reducing diet-related inequalities.

However, the Plan fails to provide any detail or background on the context of the targets. For example, in relation to the target of halving childhood obesity by 2030, it does not explain what halving childhood obesity means in practice i.e., what level of child obesity we would need to see to achieve this. This should be made clearer within the Plan to ensure this is both properly understood and able to be measured.

The plan should also link in with existing healthy weight strategies (e.g., 2018 Diet and Healthy Weight Delivery Plan) and have a clear process of how it will make additional/ considered steps to meet the childhood obesity target.

Outcome 1 in the Plan outlines that food should be age and culturally appropriate. However, this raises the question of how this will be determined. This is not made clear in the Plan and needs to be clarified.

Additional targets

We would like to see a number of additional targets in the Plan, covering areas we feel are missing from the proposed targets.

- There is currently nothing within the Plan on specifically engaging children in the Good Food Nation. It is often much harder to engage with children, particularly when they are teenagers, in relation to diet and health, and the Plan doesn't address this.

³ Scottish Government (2018) A Healthier Future – Scotland's Diet and Healthy Weight Delivery Plan
<https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2018/07/healthier-future-scotlands-diet-healthy-weight-delivery-plan/documents/00537708-pdf/00537708-pdf/govscot%3Adocument/00537708.pdf>

- There is currently little in the Plan on the role of public procurement and how this can support achievement of Good Food Nation aims and objectives. We would like to see a target related to public procurement.
- In relation to Outcome 3, there is currently nothing within the targets on mental health and wellbeing. This is significant omission as it is a core focus of Outcome 3 and as such there should be a target within the Plan explicitly addressing it. Diet and weight are known to have profound mental health impacts for both adults and children and should be recognised within the Plan.
- In relation to Outcome 3, there is no mention within the Plan of diet-related conditions/non-communicable diseases (NCDs), such as type 2 diabetes and cancer. Measuring and monitoring these over time could provide a helpful indication of the short and long-term impacts of diet and weight on specific health and disease outcomes. We would like to see a target added to the Plan to reflect this.
- In relation to Outcome 1, there is no mention of food safety within the Plan. Food Standards Scotland has several mechanisms already in place for monitoring and reporting food safety, which could easily be built on and incorporated into the Plan.
- Outcome 1 also states that age and culturally appropriate food will be delivered, however there is no detail in the targets outlining how these characteristics will be determined or measured. This should be clarified.

Additionally, we would like to see a target within the Plan on the Scottish Dietary Goals. The Scottish Dietary Goals are featured in the list of indicators listed under Outcomes 1 and 3 but says nothing about what the measurement of success will be in relation to these. The target we propose for inclusion is ***Achieve the Scottish Dietary Goals by 2035***. We would like to see this target considered for inclusion in future versions of the Plan.

Finally, in the tables listed under each of the Outcomes in the Plan in relation to the targets, no detail is provided on the data sources that will be used to monitor, measure and record progress towards achieving the targets. This is a significant omission and should be rectified. We will discuss this further in our response to question six in the indicators.

Question 6 – Do you think these indicators will be useful for measuring progress towards the Good Food National Outcomes?

Mostly disagree

Please comment, why or why not?

Whilst we welcome the range and breadth of indicators identified in the Plan, we feel the indicators are not specific enough in many areas. We don't feel the indicators in their current form are sufficient to deliver and enable monitoring of progress towards the Outcomes and targets.

Additionally, no data sources for the indicators are provided, and neither is the timescale over which they will be measured. The indicators as outlined in the tables under each Outcome do not provide any detail on how they will be measured, with no information on what data sets/sources of data will be used to measure and monitor progress towards the indicators, which in turn makes it very challenging to monitor and measure progress.

In relation to this, it's important to stress that for many of the indicators (and targets) in the Plan, the data which could be used to monitor and measure progress against is already recorded, via surveys and other mechanisms, and so wouldn't require additional or new data collection for the most part.

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

There are a number of additional/other indicators we would like to see included.

In Outcome 3, we would like to see an indicator on children's weight, recording the proportion of children that fall into each weight category – underweight, healthy weight, at risk of overweight, and at risk of obesity. Currently, the indicators in the Plan only outline the percentage of children at risk of overweight and the percentage of adults and children who are a healthy weight. Including each weight grouping/category as indicators would be helpful to monitor and assess changes across the weight spectrum and to get a better understanding of changes in each category.

We note there are no indicators in relation to deprivation and weight in the Plan as it currently stands. Given the focus in the targets on reducing diet-related inequalities, this is an obvious gap that needs to be addressed – we cannot work towards targets on reducing diet-related inequalities if we don't have indicators which map out and measure weight outcomes in relation to deprivation. We would also like to see similar indicators for sex and age, to further contribute towards measuring diet-related inequalities.

Other indicators we would like to see include:

- Rates of dental decay in children – as an indicator of diet and weight. Evidence shows that dental decay can be a consequence of poor diet in children, and is often patterned by deprivation, with children from more deprived backgrounds more likely to present with signs of tooth decay than their less deprived peers⁴.
- Pre-natal weight measurement. The weight of women prior to pregnancy and in the early stages of pregnancy matters for both the health of the mother and their child. Babies born from mothers with overweight and obesity are two to three times more likely to be of a high birth weight (categorised as being 9lb or over) and maternal obesity is also associated with a greater risk of miscarriage, death during labour, and stillbirth⁵. The weight of expectant mothers is captured in the early stages of pregnancy and reported annually by Public Health Scotland in the *Births in Scotland* report. This data set should be incorporated into the Plan as an indicator.
- Exposure to unhealthy food marketing and promotions. An indicator on this would draw out important linkages between the food environment and health and weight outcomes, and could track how an increase or decrease in exposure to marketing and promotions influences weight outcomes. Tools such as the Food Environment Assessment Tool (FEAT)⁶ could be used support this.
- Contribution of healthy food provision via public procurement. An indicator to reflect how well public institutions facilitate and support healthy diets is important for measuring positive changes to the food environment. There is already a precedent for this in the form of the Healthcare Retail Standard which covers the entirety of Scotland, with monitoring and evaluation in place. Expansion of similar programmes to other public organisations and spaces is therefore possible and should be progressed.

We note the current process for collating and reporting data on children does not reflect the full spectrum of childhood and isn't aligned with the age range determined in the UNCRC, which Scotland has signed up to. Currently, the Scottish Health Survey collates data on children from age 2-

⁴ Food Foundation (2023) The Broken Plate: 2023. The State of the Nation's Food System
https://foodfoundation.org.uk/sites/default/files/2023-10/TFF_The%20Broken%20Plate%202023_Digital_FINAL..pdf

⁵ Maternity and Early Years (2013). *Obesity in pregnancy - Maternal and Early Years*

⁶ <https://www.cedar.iph.cam.ac.uk/feat/>

15, but the UNCRC defines children as being from ages 0-18. This needs to be considered if we want to have a full measure of health and weight for children.

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

The indicators currently included in the Plan are broadly welcome, but they are not specific enough in many areas. For example, under both Outcomes 1 and 3, there is an indicator on the Scottish Dietary Goals. The Goals have simply been listed as an indicator, with no detail about what the measurement of success will be in relation to these i.e. is the indicator measuring if they have been achieved, compliance with them or how relevant they are in relation to the Scottish diet? This is not explained/outlined. The indicator needs to be made more specific, so it is clear what is being measured and monitored in relation to the Scottish Dietary Goals.

Outcome 1

Outcome 1 includes the Eating Out Eating Well Framework (EOEW) and other voluntary measures as an indicator. As voluntary measures such as these are known to be much less effective and impactful than mandatory measures for improving population diets and weight outcomes, we don't feel they should be included within the indicators, as they won't provide an overall picture as they will only have limited reach and impact.

Outcome 3

Outcome 3 has the number of companies investing in reformulation listed as an indicator. However, simply measuring the number in this way is arbitrary and implies little about the impact on the healthiness of the food. Simply measuring or counting the number of companies who have invested in reformulation doesn't contribute towards meeting the objective and so should be removed as an indicator, and instead be replaced with one which records the nutritional changes/improvements of the food being reformulated, such as sugar and/or calorie reduction.

Outcome 5

Outcome 5 outlines an indicator on funding committed to food education. We feel this is problematic for a number of reasons. First, the amount of money allocated tells us nothing about how effective something is or will be. Secondly, we don't believe that food education should be included as a core indicator. Evidence shows that food education initiatives have limited effectiveness in terms of improving healthy weight and can actually widen inequality. The example of the 5-a-day campaign outlined in our response to question 2 is a good example of this.

Question 9 – 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?

Mostly agree

What changes, if any, would you make?

We broadly welcome this vision for children in a Good Food Nation. However, there are a number of changes we would like to see.

There is no acknowledgement of inequality and poverty in the snapshot nor mention of addressing these issues. Given that addressing inequality is a strong focus of the targets and indicators in relation to children within the Plan, this is a significant omission and something that needs to be

addressed. We would like to an addition to this snapshot that outlines a commitment to reducing inequalities in a Good Food Nation for children.

Bullet point 1 in the snapshot states that a child should have access to food that is healthy and nutritious that is “appropriate for my age”. We feel it would be more appropriate for this to be replaced with “appropriate for me”, as what is appropriate, healthy, and nutritious for one child of a particular age can vary from another child of the same age. We would also suggest changing the wording to include ‘access to *and benefit from* food that is healthy...’ to reaffirm the desired positive impact this access would have.

There is also no mention of exposure to unhealthy food, which we feel is a significant omission. Evidence shows that children and young people are heavily exposed to unhealthy food and unhealthy food marketing in their daily environments⁷, and that this shapes their food norms and preferences⁸, which in turn impacts on diet and weight outcomes. We propose the inclusion of the following statement, or similar, in the snapshot box to account for this – “*I live, play and go to school in an environment where I’m not exposed to unhealthy food and the marketing of it*”. This links closely with and is in line with the commitment of the UN Convention on the Rights of the Child (UNCRC), which Scotland has recently incorporated into law, to protect children from harm by reducing their exposure to aggressive unhealthy food marketing.

We note the snapshot mentions food education as a core focus. We have concerns about this and would like to see less focus on food education, recognising both the limited effectiveness and impact that food education on its own has.

We would also support expansion of bullet point 4 to include children never being exposed to *household or parental hunger*. Any experience of food insecurity in a child’s life, directly or indirectly, should be mitigated in order to protect them and provide the best possible environment to thrive while growing up.

Question 10 – 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?

Mostly disagree

What changes, if any, would you make?

We mostly disagree.

Most, if not all, of the points in the snapshot box have a strong focus on food education and rely heavily on personal responsibility, and education focused actions. This comes across most strongly on page 30 of the National Plan document where it discusses the wide, encompassing role of food education in schools and other settings for children. We recognise there is and should be a role for food education, but this shouldn’t be the only focus for addressing population diet and improving weight outcomes. Continuing to focus on food education in this way will do very little to improve the overall diets and weights of our children and could contribute to further widening inequality. We would like the snapshot to have less focus on education and actions which require a high degree of

⁷ Scottish Obesity Alliance (2024) Adverts, adverts everywhere. Young people’s perceptions of and exposure to unhealthy food marketing in Scotland <https://www.scottishobesityalliance.org/media/utujojqq/adverts-adverts-everywhere-report-final-version.pdf>

⁸ Boyland et al (2022) Association of Food and Non-alcoholic Beverage Marketing With Children and Adolescents’ Eating Behaviors and Health A Systematic Review and Meta-analysis. JAMA Paediatrics 2022;176(7):e221037. doi:10.1001/jamapediatrics.2022.1037

individual agency, and shift towards a greater focus on and recognition of the impact of the food environment and wider structural factors.

In relation to bullet point four in the snapshot box on pregnancy and infant feeding, there is again a strong focus on individual agency, by suggesting that women can make fully informed choices about feeding their baby. Whilst we agree that women are likely to be fully informed about feeding themselves and their baby. i.e. they know what is healthy and nutritious, many women are simply not able to access the food they need for themselves and their baby, as a result of a broad range of structural factors and the food environment they experience on a daily basis, which mean they are not able to access healthy options. This needs to be recognised within the snapshot box and we would like to see bullet point four updated/amended accordingly to reflect this.

We note that there is no mention of never experiencing hunger within the snapshot box for parents and carers. This appears in the snapshot box for children, and we believe this should also be an aim for other population groups, in particular parents and carers. Evidence shows that parents/carers will often absorb or shield children from food insecurity issues and will often go without to ensure their children have enough to eat⁹. This indicates that including a focus on never experiencing hunger for parents and carers is also crucially important. Ensuring everyone has ready access to the food they need to keep them healthy and nourished should be a fundamental principle of a Good Food Nation.

Each of the statements in the snapshot are based on a presumption that they are true for all parents/carers, but in reality, this is unlikely to be the case. Individuals don't know what they don't know and this needs to be better accounted for in the snapshot. We live in a landscape that can be challenging to navigate, in relation to benefits, healthcare and other entitlements, all of which can impact on diet and weight outcomes and further widen inequality if they are accessed by some but not others who are as equally entitled/eligible. We feel the snapshot doesn't sufficiently take this context into account.

Question 11 – 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?

Mostly agree

What changes, if any, would you make?

Some of the statements in the snapshot box address access and a lack of money, but there is no mention of affordability of food within the snapshot which is a concern. A lack of affordability of healthy food has been identified as one of the main barriers which prevents people from eating a healthy, sustainable diet¹⁰. We would therefore like to see something added on affordability to reflect this.

Further, there is no mention of inequality within the snapshot. Like with the snapshot box on children, this is a significant omission, particularly given that many of the targets and indicators on adult diet and weight within the Plan have a focus on reducing inequality.

⁹ Poverty Alliance and Scottish Women's Budget Group (2022) "It's hard work being poor" Women's Experiences of the Cost-of-Living Crisis in Scotland https://www.abrdn.com/docs?editionId=97ceb173-265d-4b8d-87dd-b349509ed24b&_gl=1*oxg3fh*_gcl_au*MTc2Mjg5NDZlE3MTE0NTQ2ODE.

¹⁰ Food Standards Scotland (2024) Food in Scotland. Consumer Tracking Survey Wave 16 Presentation of results (Aug 2023) https://www.foodstandards.gov.scot/downloads/Food_in_Scotland_Consumer_Tracker_Survey_Wave_16_report.pdf

More broadly in the text that follows the snapshot box in the Plan, it is welcome that whole systems approaches are referenced, and their contribution recognised. It is also welcome that page 33 of the Plan outlines that ensuring access to a healthy diet is an important aspect of reducing diet-related health inequalities. However, the Plan says nothing about how this will be achieved or monitored. This needs to be set out clearly in order for it to be achieved.

Question 13 – Snapshot Box: As a retailer in a Good Food Nation

Does this reflect that you would like your life to look like, as a retailer in a Good Food Nation?

Not applicable

What changes, if any, would you make?

We have general comments to make about the related section in the Plan document. We do not represent retailers.

The snapshot box outlines that retailers in a Good Food Nation will work to create store environments that make healthy and nutritious options affordable and appealing for everyone. It is welcome this is recognised as a responsibility of retailers and is included in the Plan; however, we don't feel that the section of the Plan which follows for retailers would facilitate/enable this to happen.

This section of the Plan is where various policies such as regulations to restrict promotions of HFSS food and drinks and the Out of Home Action Plan, are mentioned for the first time. It is welcome that the role of retailers in creating healthier store environments through effective implementation of such regulations is recognised and outlined. However, it is concerning that this is the only place in the Plan where these critical regulations and legislation are mentioned and discussed. This suggests that the focus is on the impact of such regulations on the food and drink industry, rather than on improving population diet and weight. There is little to no mention of the known positive impact for population diet and weight of these policies within the Plan. We would like to see greater recognition of this in future versions of the Plan and for the text to be relocated so the focus on improving health and weight outcomes is more explicit.

In relation to this, we note there is no mention of the commercial determinants of health within the Plan or an acknowledgement of the impact and influences the practices of the food industry can have on population health outcomes and achieving a Good Food Nation. We feel the current version of the Plan does not give enough priority to discussing investment in meaningful legislation, such as restrictions on advertising and promotions of unhealthy food and drink, with little to no mention of the positive impact such policies will have for improving public health and for delivering a Good Food Nation. Further, the Plan does not make it clear how the ambition and commitments of a Good Food Nation can be reconciled with the aims and ambitions of an industry-led food and drink strategy, which focus on business growth and profit, rather than health. The current version of the Plan is lacking in detail on this.

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

General comments:

Overall, we feel the document is not laid out as a Plan and doesn't read as one. It essentially reads as a summary of everything the Scottish Government has done to date related to the food system in

Scotland. By definition, a Plan should have a clear set of deliverable actions, with measurable and realistic targets, set against a time frame for delivery.

The information detailed in each snapshot box, and the accompanying sections of the Plan, for each group identified does not set out new information or commitments or provide comment on how actions and outcomes will be delivered to make the snapshot visions reality. Further, many of the examples outlined in the snapshot boxes and accompanying text remain focused on education and individual-level policies, rather than those with a focus on addressing the food environment and wider structural determinants that are known to be much more effective. This is disappointing and indicates a reluctance to take the required bold and urgent policy action needed.

Overall, we feel the Plan is unspecific and it's very unclear what it will deliver and change in terms of improving the food system in Scotland, protecting health from harm, and indeed improving population wellbeing.

In relation to specific points in the Plan document:

Page 24 of the Plan states: *"We will engage with the food-related business sector and other key stakeholders throughout the development and review of this plan and its future iterations"*. In relation to this, we note that the food-related business sector is the only sector specifically mentioned here, with all other stakeholders covered by a general catch-all term. This is problematic for a number of reasons. First, it suggests that the needs and interests of the food business sector are being prioritised and are more important than the needs of other stakeholders. To date engagement with the third sector on topics and themes detailed in the Plan has been limited. Secondly, by not identifying who the other key stakeholders are or intended to be, leaves it very unclear and open to interpretation with regards to who the Scottish Government are required to engage with. We would like to see a more detailed list of stakeholders identified in future iterations of the Plan.

As outlined earlier in our response, we are also concerned that the proposed regulations to restrict price and location promotions of unhealthy HFSS products is only first mentioned on page 41 of the Plan and is located in a section of text discussing the purchasing and consumption of food in the out of home (OOH) sector. Given that this policy, alongside others, is of crucial importance to so many areas and outcomes within the draft Plan, why it only being first mentioned so far into the Plan and only in a section in relation to the OOH sector, when the reach and focus goes far beyond the OOH sector? There is a slightly more in-depth paragraph about promotions on page 42, but this is wedged in between text about tourism. It feels misplaced and not given the prominence it requires.

Page 56 of the Plan mentions alcohol, specifically the role of the alcohol industry and their contribution to the economy. We are disappointed to note there is no reference to the role alcohol plays in our diets and in our food culture in this section or anywhere else in the Plan. Alcohol is an important source of excess calories in adults. Data from Food Standards Scotland shows that alcohol contributes around 9% of calories in adult diets in Scotland. Alcoholic drinks can also contain considerable amounts of sugar and are often mixed with syrups and sugary soft drinks, further contributing to excess sugar and calorie consumption¹¹. We would like to see the National Good Food Nation Plan recognise and explicitly acknowledge this. Simply focusing on the contribution of the alcohol industry to the Scottish economy sends the wrong message with regards to priorities and lacks recognition of the links between alcohol, diet, and health outcomes.

¹¹ Food Standards Scotland (2020) Situation Report: The Scottish Diet: It needs to change https://www.foodstandards.gov.scot/downloads/Situation_Report_-_The_Scottish_Diet_It_Needs_to_Change_%282020_update%29.pdf

Currently missing from the Plan:

Missing from the Plan is an acknowledgement of what is missing. The Plan needs to be explicit on what the gaps are (e.g. new data sources) in order to develop and improve outcomes and indicators going forward for future iterations.

Specifically, there are a few issues/topics we believe are missing from the Plan which we would like to see included in future iterations.

The Plan fails to make any linkages with wider policy objectives and frameworks. The Good Food Nation Plan needs to extend its reach beyond food policy initiatives. Food is such an integral part of so many aspects of people's lives that it cannot be seen in isolation. It is well evidenced in the literature that to achieve a healthy food system/environment and tackle issues of overweight and obesity, there is a need to look beyond focusing on food policy initiatives, to remove siloes in current national and local policy development and take into consideration wider social, economic, and commercial determinants of health. Access to food, for example, is very closely linked to and often determined by factors such as financial circumstances, community planning and infrastructure, and availability of public transport, to name a few. The Plan document does outline and show links with wider aspects of food policy, but it largely fails to make these connections out with food and associated policies. Without directly acknowledging and specifically linking to these other areas, the overall aims and ambitions of a Good Food Nation are unlikely to be achieved.

Action to align with other major and related policy areas is also essential to ensure policy coherence. Some policies can indirectly act to reduce the prevalence of obesity via policy actions with other motivations. Addressing the challenges faced by the food system requires a comprehensive and systems-oriented approach. Cross-government, cross-sector collaboration must be a key outcome. This will ensure that key decisions that are made on food consider the impact beyond food policy and the food system.

Furthermore, the wellbeing economy approach is not mentioned within the Plan. The wellbeing economy is emerging as a core theme of the Scottish Government, and it is therefore important to ensure alignment between this and the Good Food Nation approach. This is currently missing from the Plan.

Finally, the Plan doesn't mention how progress against the Outcomes, targets and indicators will be monitored, and reported. We know the timeline in the legislation outlines a revised version of the Plan is expected every 5 years, with progress reported every 2 years, but no details are provided on the mechanism for this and how it will be delivered in practice. This increases uncertainty over how the Plan will be implemented and delivered.

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

We understood that the whole objective of the Good Food Nation (Scotland) Act 2022 and its associated National and Local Plans, is that it will apply across all areas of government and policy. This therefore raises the question as to why there is a need to set out specified functions (and specific areas) in this way within the national Plan, if the aim is for this to be a whole of government/whole of Scotland approach? Outlining a specific list in this way suggests this is a limited function for only certain sections of the Government and for specific pieces of legislation, and also doesn't account for the impact that food and the food system might have on other areas of policy which on the surface don't seem to be influenced by or influence the food system, but which actually do.

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

We would like to see the Planning (Scotland) Act 2019¹² added as a specified function, and the associated National Planning Framework 4 (NPF4). The planning system plays a critical role in shaping the food environments experienced every day, through planning application decisions which determine the location of premises selling food and other amenities. NPF4 offers some important opportunities with regards to the provision and availability of healthy food in a neighbourhood, such as developments not being supported that will have an adverse impact on health and local place and development plans identifying areas where healthy food and drink outlets can be supported.

Whilst much of the decision-making power and responsibility for planning lies with local authorities, ensuring it is featured appropriately in the National Plan highlights its importance in relation to the food system, and ensures it is much more likely to be considered within the Local Food Plans.

About us

The Scottish Obesity Alliance serves as a forum for organisations to collaborate to influence policy and practice obesity prevention in Scotland.

For any enquiries related to this submission, please contact info@scottishobesityalliance.org

¹² <https://www.legislation.gov.uk/asp/2019/13/contents/enacted>