

**Right to Food (Scotland) Bill
A proposal for a bill to incorporate the right to food into Scots law**

Consultation by Rhoda Grant MSP, Scottish Labour Party for Highlands and Islands

**Response from Obesity Action Scotland
Closing date: 16 February 2022**

Aims and approach

Question 1 – Which of the following best expresses your view of the proposal to incorporate the right to food into Scots law?

- **Fully supportive**

Please explain the reasons for your response.

We are fully supportive of enshrining the human right to food into Scots law because it would help ensure that the Scottish Government and other public sector bodies prioritise the wellbeing of people and the environment in decisions on the food system. However, we believe it is not simply enough to enshrine the right into Scots Law; this needs to be done through the Good Food Nation Bill itself. We welcome the member's support for the right to be introduced through the Good Food Nation Bill and echo this call.

The Bill states that it will “give practical effect to the right to food”; however, in its current format, the Bill is very limited in giving this effect, as it has regard to a very limited number of international human rights instruments¹. This needs to be significantly strengthened if the right to food is to be realised. We believe this should be delivered through enshrining the right through the Good Food Nation Bill itself, rather than via general human rights legislation. We called for this in our evidence submission² to the Scottish Parliament's Rural Affairs, Islands and Natural Environment Committee's (RAINE) call for views; as a member of the Scottish Food Coalition, we support the Coalition's position in this regard.

Ensuring the right to food in law is a very important legislative tool and adds weight to the ambition for Scotland to become a healthy and sustainable good food nation. Why does the right to food matter? In Scotland, obesity is a significant issue, with two thirds of adults either overweight or obese³. Rates of obesity are higher in areas of greater deprivation, and there is a significant burden

¹ Good Food Nation (Scotland) Bill Policy Memorandum <https://www.parliament.scot/-/media/files/legislation/bills/s6-bills/good-food-nation-scotland-bill/introduced/policy-memorandum.pdf>

² <https://www.obesityactionsotland.org/media/1684/20211222-oas-response-raine-committee-call-for-view-gfn-bill-january-2022-final.pdf>

³ Scottish Government (2020) Scottish Health Survey 2020: volume 1, main report <https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2021/01/scottish-healthsurvey-telephone-survey-august-september-2020-main-report/documents/scottish-health-survey-2020-edition-telephone-survey-volume-1-main-report/scottish-health-survey-2020-edition-telephone->

of ill-health and inequality from obesity. Evidence shows that 40% of women in the most deprived areas have obesity compared to 18% in the least deprived areas⁴, and, over the last decade, the percentage of children at risk of overweight and obesity has increased in the most deprived areas. Obesity is a significant cost to the NHS, at £600 million per year⁵. This clearly demonstrates the significant challenge and burden from obesity to Scotland and highlights the need for a right to food to form the basis of our food system.

We note the definition of the Right to Food detailed in the consultation document from the UN Special Rapporteur outlines ensuring regular and unrestricted access to adequate and sufficient food. We do not believe this definition goes far enough and should not be the one used for the Right to Food in the Good Food Nation Bill. The Bill needs to ensure that the right to food is a right to healthy, nutritious and sustainable food, and its meaning needs to be defined in the legislation. It needs to go further than simply 'adequate' and 'sufficient' food or, if adequate and sufficient are the terms being adopted, they need to be defined in such a way that ensures both human and planetary health.

As noted in the consultation document, food insecurity is a significant and increasing challenge in Scotland, and is intrinsically linked with the Right to Food. Evidence shows that younger adults are more likely to experience or be at risk of food insecurity⁶, with 8% of adults in Scotland reporting food insecurity. This is associated with poorer wellbeing outcomes across the population. Enshrining a commitment in the Bill to eliminating food insecurity, as a fundamental part of a right to food, would significantly contribute to tackling these issues and help to deliver a good food nation for all. Further, we welcome that the consultation document recognises the importance of taking a whole systems approach, tackling issues such as poverty, climate change, and diet-related ill health and disease, including non-communicable diseases (NCDs). This further demonstrates the importance of the food system to health and wellbeing outcomes, and the need for the right to food to be enshrined in Scots Law through the Good Food Nation Bill.

If the right to food is not going to feature within the Bill itself, the Bill can still help to progress the right to food, and establish it is a core principle of food policy in Scotland. The Bill needs to provide a clear pathway on what it will do to facilitate and deliver the right to food, outlining that the right to food is a human right, and to create the system and environment to ensure everyone has access to healthy, nutritious, sustainable food which promotes and delivers human and planetary health. This would include linking with other legislation and legislative areas, including legislation to tackle the price, availability and marketing of unhealthy food, tackling obesogenic environments, and supporting a Whole Systems Approach, for example. This Bill must be made forward compatible for the progression of the forthcoming Human Rights Bill.

[surveyvolume-1-main-report/govscot%3Adocument/scottish-health-survey-2020-edition-telephone-survey-volume1-main-report.pdf?forceDownload=true](https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2021/01/scottish-healthsurvey-telephone-survey-august-september-2020-main-report/documents/scottish-health-survey-2020-edition-telephone-survey-volume-1-main-report/govscot%3Adocument/scottish-health-survey-2020-edition-telephone-survey-volume1-main-report.pdf?forceDownload=true)

⁴ Scottish Government (2020) Scottish Health Survey 2020: volume 1, main report

<https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2021/01/scottish-healthsurvey-telephone-survey-august-september-2020-main-report/documents/scottish-health-survey-2020-edition-telephone-survey-volume-1-main-report/govscot%3Adocument/scottish-health-survey-2020-edition-telephone-survey-volume1-main-report.pdf?forceDownload=true>

⁵ Scottish Government (2020). Diet and healthy weight: monitoring report 2020

<https://www.gov.scot/publications/diet-healthy-weight-monitoring-report-2020/>

⁶ Scottish Government, 'Scottish Health Survey – Telephone Survey – August/September 2020'

<https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2021/01/scottish-healthsurvey-telephone-survey-august-september-2020-main-report/documents/scottish-health-survey-2020-edition-telephone-survey-volume-1-main-report/govscot%3Adocument/scottish-health-survey-2020-edition-telephone-survey-volume1-main-report.pdf>

Enshrining the right to food in Scots law is a step in the right direction and would empower both the Scottish Government and people in Scotland, but can be further strengthened by ensuring it is incorporated through the Good Food Nation Bill.

Question 2 – Do you think legislation is required, or are there other ways in which the Bill’s aims can be achieved more effectively?

We believe legislation is required. There is clear evidence from other issues in the food environment/system, such as marketing and price promotions of high fat salt and sugar foods, that voluntary action is ineffective, with statutory legislation therefore required to ensure the relevant actors comply with the policy and for desired outcomes to be achieved. Legislation also helps to hold the Government and other public bodies to account, and makes commitments legally enforceable.

Question 3 – Which of the following best expresses your view on an independent statutory body being given responsibility for overseeing and reporting on progress towards realising the right to food?

- **Partially supportive**

Please explain the reasons for your response.

We agree that there should be an independent statutory body, with responsibility for overseeing and reporting on progress towards realising the right to food; however, the interaction of the independent body with other pre-existing bodies responsible for food needs to be made clear.

Government and public authorities need to be held to account through the measurement of policy implementation, evaluation of policy impact and actions’ impact, and examination of political, economic, sociocultural and commercial barriers to and enablers of the policy⁷. We do not believe it would be appropriate for such authorities to hold themselves to account in this way and this also applies to overseeing the implementation of the Bill. There needs to be an independent statutory body responsible for overseeing implementation, with stringent powers to scrutinise, sanction, and enforce where proper and effective implementation is not taking place.

Other benefits of an independent statutory body include cross-departmental reach and cross-societal impacts. Such a statutory body would not only report on the state of the food system but also, importantly, focus on policy coherence across Government and relevant authorities when implementing national and local food plans, helping to ensure all relevant actors are involved in delivering a good food nation. Additionally, an independent statutory body would create a platform for public participation in food policy, overseeing a democratic and rights-based approach to food.

There needs to be clarity on how the independent statutory body will operate. Its role needs to be clearly defined, including what it will achieve, in order to determine what the most appropriate solution would be. In other words, what the format, structure and its remit should be. The role of the independent statutory body is to hold the government to account and ensure the Good Food Nation Bill is implemented in a way which supports delivery of a healthy weight for all, with easy access to healthy, nutritious and sustainable food that is good for both human and planetary health. Such a body should be impartial and take a systems-wide approach to protecting everyone’s right to food, and to ensure the Government (and other relevant actors) keeps its promises. This should form the basis of decision-making on the body. Further, it is important that the body does not replicate existing bodies, but that it adds capacity and expertise by taking a systematic approach and

⁷ Swinburn B, Kraak VI, Allender S, et al (2019) The Global Syndemic of Obesity, Undernutrition and Climate Change: The Lancet Commission report. Lancet 393(10173):791-846

drawing together the different strands that are integral to improving the food environment and supporting delivery of a good food nation.

Question 4 – Should an independent body be given responsibility for overseeing and reporting on the right to food, do you think it should be:

We do not believe there is currently an existing body with the correct remit and powers to deliver and oversee reporting on the right to food. However, as outlined in our response to question 3, we believe the role of the independent statutory body needs to be clarified and clearly defined before a decision is taken on the format it will take.

We understand that Food Standards Scotland (FSS) has previously been explored as a possible option for undertaking the role of an independent body for the Good Food Nation Bill⁸. We do not believe this would be appropriate or the best option, based on the current structure and priorities of FSS, which is focused primarily on food safety and dietary guidance. If FSS were to be appointed as the independent statutory body for the Good Food Nation Bill, there would need to be a significant change to its role and remit, which is currently too narrow to encompass all essential elements of delivering a good food nation.

If a new body were to be created, we would support an independent body being established in the style of the Scottish Land Commission.

The independent statutory body should contain a range of actors from a variety of sectors and with a range of expertise, including scientists, public health professionals, farmers and those who have worked on the front line along the food chain, addressing challenges with food insecurity for example, as they will help to bring knowledge and expertise that will create and shape a food system that meets the needs of everyone. These actors could be involved in advisory roles or as board directors, for example, to steer and shape the strategic direction of the organisation.

Question 5 – Which of the following best expresses your view of enshrining a right to food into Scots law as a priority in advance of, and in a manner which is compatible with, any further Scottish Government legislation on wider human rights?

- **Fully supportive**

Please explain the reasons for your response.

As outlined in response to question 1, we are fully supportive of the right to food being enshrined into Scots law and believe this should be done at the earliest opportunity through the Good Food Nation Bill. We cannot deliver a good food nation and eliminate food poverty and insecurity without the Right to Food. It must be a guiding principle of the Bill and explicitly outlined within it.

It is encouraging that the Scottish Government has made a wider commitment to human rights in the future. However, the proposed Human Rights Bill is significantly further behind in its progress through parliament than the Good Food Nation Bill, with the timing for its implementation uncertain. Therefore, this will cause a lag or gap in the right to food becoming law and will leave an unknown period where this right is not protected in law. There is also concern that the right to food, which has been overlooked in the past, will continue to be overlooked as part of a wider package of rights, and may make it seem of less importance in relation to creating a good food nation. The credibility of the Bill will also be damaged if it is not explicit that the right to food will be delivered as part of the Bill.

⁸ Brand, A (2021) Scottish Parliament Information Centre (SPICe) Briefing: The Good Food Nation (Scotland) Bill <https://sp-bpr-en-prod-cdnep.azureedge.net/published/2021/12/17/a205d14c-249f-410a-a405-6b170ce68389/SB%2021-85.pdf>

If the Scottish Government are committed to tackling food insecurity and incorporating a right to food into Scots law, as they have publicly stated they are, then they should seek to do so at the earliest possible opportunity, and this would be via the Good Food Nation Bill.

Question 6 – Which of the following best describes your view of placing responsibility for guaranteeing the right to food on the Scottish Government?

- **Fully supportive**

Please explain the reasons for your response.

The right to food recognises that it is Governments at all levels who has responsibility to deliver this right to everyone in Scotland. The right to food would create government responsibility for addressing structural issues in the food system, including production, processing and marketing, for example. Therefore, responsibility for the processes that increase availability of HFSS (high in fat, sugar, salt) food, for example agricultural policies, food trade, regulation of marketing or taxation of food and beverages would need to be considered for their impact on access to healthy food.

The right to food makes it clear that it is the Government's responsibility to ensure that everyone can access food that is of good quality, nutritious, safe to eat and available, with dignity. As previously outlined, Scotland has an obesity crisis, with two-thirds of the adult population either overweight or having obesity. In addition, we have failed to meet Scottish Dietary Goals for more than two decades and the burden of diet-related disease and ill health to society is significant and growing. To achieve the required shift in diet and diet-related health, we need improved accessibility, affordability and acceptability of healthy food to consumers in Scotland. Putting the right to food into law will place an obligation on the Government to act to change the food system so that it promotes better public health. Enshrining the right to food into Scots law, and making government the duty-bearer for the right, will ensure that policy and law makers treat the food system as a health priority.

Responsibility should also be placed on Government in relation to tackling food insecurity. Charities and food banks should not be responsible for dealing with these issues unsupported. Instead, the Government must take responsibility to tackle the root causes of the issue, and putting the right into Scots Law, with the Government as duty-bearer, would ensure more resources are allocated to tackling the underlying causes.

The Scottish Government has a commitment to Open Government, which outlines their dedication to improving its own practices relating to transparency, participation and empowerment⁹. This commitment needs to be met and enhanced through the Good Food Nation Bill, specifically through implementing the right to food in the Bill itself.

Covid-19 pandemic

Question 7 – What impact do you consider the effects of, and response to, the Covid-19 pandemic has had on the need for a right to food to be incorporated into Scots law?

- **Increased the need for the Bill**

Please explain the reasons for your response.

The Covid-19 pandemic has undoubtedly increased the need for the Bill. The pandemic has had, and continues to have, a profound impact on the food system and society more broadly in several ways.

⁹ <https://www.gov.scot/policies/improving-public-services/open-government-partnership/>

The Covid-19 pandemic has changed our relationship with food and consumption patterns. It has exacerbated existing problems with diets and unhealthy eating and weight, with many people reporting eating more unhealthy foods on a more regular basis, and has exposed weaknesses and vulnerabilities of our food system. Findings from an Ipsos Mori poll, which examined diet and health behaviours during the Covid-19 pandemic in 2020 in 30 countries, highlight a significant weight gain burden. In the UK specifically, 32% of adults surveyed reported weight gain during the pandemic. This is broadly similar to the global picture of 31%¹⁰. The pandemic has also further exacerbated existing inequalities in diet and unhealthy weight in the population, with those in lower socioeconomic groups experiencing worse outcomes.

The pandemic has highlighted how important healthy weight is to the overall health of the population and for our response to this and future pandemics. A healthy diet is key for improving immunity, and the interconnectedness between the pandemic (outcomes) and the food system cannot be ignored. This was recognised in the House of Lords report ‘Hungry for Change’, which concluded “*The Covid-19 pandemic has reinforced the need, and provided the opportunity, for the government to act now with commitment and focus to deliver the improvements to the food system, public health and environmental sustainability that are so urgently required*”¹¹. Therefore, the response to Covid-19 must include actions to help people in Scotland eat healthier diets. This will build resilience to communicable diseases and help to address diet-related NCDs, such as heart disease and diabetes, that are so prevalent in Scotland and render the population vulnerable to complications from other disease such as viral infection. Being overweight or having obesity is a known risk factor for Covid-19.

The pandemic has further exacerbated issues such as food insecurity, especially for children, with more families experiencing food insecurity. As discussed earlier in our response to question 1, the right to food is intrinsically linked to food insecurity and must be actioned as a priority. It is essential that the right to food is put into Scots law as a priority, with a commitment to tackle food insecurity, to ensure the Scottish Government puts health and wellbeing of people (and the planet) at the heart of its plans for recovery of the food system from the pandemic and beyond.

To truly deliver an economy and society that values the wellbeing of the people of Scotland, we must ensure measures to improve the diet of the population and drive the redesign of the food system are at the heart of the overall recovery from Covid-19.

Financial implications

Question 8 – Taking into account all of those likely to be affected (including public sector bodies, businesses and individuals etc.), is the proposed Bill likely to lead to:

- Don’t know

Please indicate where you would expect the impact identified to fall (including public sector bodies, businesses and individuals etc.). You may also wish to suggest ways in which the aims of the Bill could be delivered more cost-effectively.

It is difficult to answer this question without a specified timeframe. Time should be factored in when considering the cost and savings of the proposed bill. While the legislation may incur some costs in the short or medium term, however, it is very likely to return savings and benefits in the long term, and the overall benefit to cost ratio will be positive.

¹⁰ <https://www.ipsos.com/sites/default/files/ct/news/documents/2021-01/diet-and-health-under-covid-19.pdf>

¹¹ House of Lords Select Committee on Food, Poverty, Health and Environment Report of session 2019-20. Hungry for change: fixing the failures in food <https://publications.parliament.uk/pa/ld5801/ldselect/ldfphe/85/85.pdf>

We responded to the call for views on the Financial Memorandum for the Good Food Nation Bill held at the end of last year. In our response, in particular, we highlighted that the financial memorandum should be much more comprehensive and it lacks detail of costs and benefits of delivering a Good Food Nation. Delivering a food system which supports easy access to healthy, nutritious and sustainable food for all is a key aim/motivation of the Good Food Nation Bill, and therefore, the accompanying financial memorandum must account for this. As a minimum, we called for a cost benefit analysis of investing in healthy food and food systems to be outlined in the financial memorandum, and echo this call here.

It is well-evidenced that overweight and obesity continues to be a significant challenge in Scotland, with rates of overweight and obesity continuing to rise among both adults and children. This unhealthy weight burden has significant costs for both individuals and society, with overweight and obesity estimated to cost the NHS in Scotland £600 million per year. The wider economic costs are even bigger, at between £0.9 and £4.6 billion each year¹². Given such significant economic costs, there is a clear economic case for investment in tackling overweight and obesity.

Many actions and interventions which support health and a healthier food environment offer real returns on investment and are cost-effective. For example, it was shown that almost all of the obesity interventions identified in a report by the McKinsey Institute are cost-effective to society i.e. that savings on health care costs and improved productivity, through reduced absenteeism for example, could outweigh the costs of direct investment required to deliver the interventions, when assessed over the full lifetime of the target population. The report calculated that such a programme could help reverse rising obesity levels, saving the NHS around \$1.2 billion annually¹³. Globally, findings from modelling by the World Obesity Federation show that slowing the increase in overweight and obesity by 5% from calculated levels would result in annual savings of 5.2% between 2020 and 2060, equivalent to an annual cost reduction of \$3.3 billion¹⁴. This clearly demonstrates the significant economic benefits that arise from investment in healthy and sustainable food systems, to address overweight and obesity.

As the evidence outlined shows, the overall financial implications of the Bill are likely to be largely positive. Whilst there will be some cost to the Government and the public-sector to make the necessary changes, the benefits of investments to deliver the Bill, and the significant improvements to public health outcomes that it will help to deliver, are likely to far outweigh the costs. It is years of underinvestment and structural barriers to achieving equitable health which has led to the failings we have seen and continue to see in our food system, and the financial impact of greater investment in the food system, and tackling overweight and obesity, will be more than balanced out by an improvement to public health, as well as the positive impact on society and the environment.

There will be also likely be some reduction in costs for individuals. Individuals that are unable to afford nutritious food for themselves and their families will see a reduction to their costs. Putting the right to food into law will place a responsibility on Government to ensure everyone can afford nutritious food, through fair wages or adequate benefits for example. This is not about making food cheaper, rather it is about making sure everyone in Scotland can access healthy food with dignity. People will also be mentally and physically healthier as a result and this can have far reaching

¹² Obesity Action Scotland (2019) Obesity in Scotland – Causes, Prevalence and Impact https://www.obesityactionscotland.org/media/1457/prevalence_causes_impact_f-2904.pdf

¹³ Dobbs R, Sawyers C, Thompson F et al (2014) Overcoming obesity: An initial economic analysis. McKinsey Institute discussion paper https://www.mckinsey.com/~media/mckinsey/business%20functions/economic%20studies%20temp/our%20insights/how%20the%20world%20could%20better%20fight%20obesity/mgi_overcoming_obesity_full_report.ashx

¹⁴ World Obesity Federation and RTI International (2021) The Economic Impact of Overweight and Obesity in 8 Countries <http://s3-eu-west-1.amazonaws.com/wof-files/Economic-impact-overweight-obesity-in-countries-final.pdf>

positive financial implications. Improved public health can, for example, improve performance in school, resulting in better job prospects, and reduce rates of absenteeism from the workplace.

There is likely to be an increase in costs for the public sector, particularly in the short to medium-term. This cost will arise from changes to supply chains and procurement practices required to deliver healthier food provision in public sector settings. The precise cost of this is uncertain and could vary between public sector providers and between areas. However, over the longer term, once changes in procurement practices etc. have been established, there are likely to be cost savings. Further, as has been outlined above, the provision of healthier, sustainable food in such settings, will positively contribute to improved dietary and public health outcomes of the population. The public sector should be an exemplar for the Good Food Nation, and lead by example. Public sector food provision which is healthy and sustainable should not be seen as a cost to bear, but rather as a worthwhile investment.

Equalities

Question 9 – What overall impact is the proposed Bill likely to have on equality, taking account of the following protected characteristics (under the Equality Act 2010): age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation?

- **Positive**

Please explain the reasons for your response. Where any negative impacts are identified, you may also wish to suggest ways in which these could be minimised or avoided.

According to Article 2 of the International Covenant on Economic, Social and Cultural Rights (ICESCR), rights laid out under the covenant, which includes the right to food, must be realised “without discrimination of any kind as to race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status”¹⁵. This is a welcome principle, which needs to be delivered through the Good Food Nation Bill.

We know that the most deprived are more likely to suffer from food insecurity and to experience negative health outcomes associated with this insecurity and poorer diets, including overweight and obesity and greater incidence of NCDs. The right to food is about improving the food system for the benefit of everyone in Scotland. Equality is at the heart of the right to food, ensuring that everyone has access to healthy, nutritious and sustainable food.

We welcome the proposal in the consultation document for all legislation on food to be impact assessed to ensure there is no negative impact on the protected characteristics. In particular, we would like an Equalities Impact Assessment to be carried out as part of the Bill process, to ensure the impact of the legislation on equalities outcomes is clearly outlined, understood and accounted for in decision making processes. This should also be extended to include a Health Impact Assessment (HIA).

With regards to the independent statutory body, it is important that its representation takes account of the protected characteristics, such as age, disability, gender, marriage and civil partnership, pregnancy and maternity, race and ethnicity, religion or belief, sexual orientation. Promoting equality and ensuring everyone is represented and has their voices heard is at the heart of the right to food and so it must be key to any decisions about our food system.

¹⁵ <https://www.ohchr.org/en/professionalinterest/pages/cescr.aspx>

Sustainability

Question 10 – In terms of assessing the Bill’s potential impact on sustainable development, you may wish to consider how it relates to the following principles:

- Living with environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting effective, participative systems of governance
- Ensuring policy is developed on the basis of scientific evidence

With these principles in mind, do you consider that the Bill can be delivered sustainably?

- Yes

Please explain the reasons for your response.

The Bill will have positive social and environmental impacts, helping to improve and enhance sustainability. The Scottish Government have committed to delivering a wellbeing economy agenda stating the wellbeing economy “will be built on the principles of sustainable economic growth, accompanied by tackling inequalities”¹⁶. Improvements to the food system, food and national diets need to be part of this, and the Good Food Nation Bill can and must have an important role to play in supporting delivery of this agenda.

As has been outlined throughout our response, environmental health, sustainability and human health and wellbeing are inseparably linked. There is a wealth of, and rapidly growing, evidence for the importance of including food and health considerations in sustainability decision-making. For example, policies related to climate change and health inequalities have been identified as being of particular importance in the development of strategies to tackle obesity and deliver healthy food systems¹⁷. This was explored in a 2019 report by the EAT Lancet Commission which introduced the idea of “the Global Syndemic” – the challenges of obesity, climate change and undernutrition are closely aligned and by bringing them all together under the “Global Syndemic” concept, there is increased potential to strengthen action and also accountabilities on all three challenges¹⁸.

If properly implemented and delivered, the Bill will have a range of positive social and environmental impacts including: making farming and fishing less wasteful and less polluting, which will have a positive environmental impact; improving wages and social security so that individuals and families can afford a healthy diet, which will have a positive social impact; and improving business employment practices, which may come at an initial cost increase, but the benefit of job retention, a healthier workforce, and better public perception of those businesses should have a long term positive economic impact.

General

Question 11 – Do you have any other additional comments or suggestions on the proposed Bill (which have not already been covered in any of your responses to earlier questions)?

¹⁶ <https://www.gov.scot/publications/blueprint-scotlands-wellbeing-economy/>

¹⁷ Government Office for Science (2007) Foresight Tackling Obesity: Future Choices – Project Report, 2nd edition

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/287937/07-1184x-tackling-obesities-future-choices-report.pdf

¹⁸ Swinburn B, Kraak VI, Allender S, et al (2019) The Global Syndemic of Obesity, Undernutrition and Climate Change: The Lancet Commission report, Lancet 393(10173):791-846

As outlined in our response¹⁹ to the Scottish Parliament's Rural Affairs, Islands and Natural Environment Committee's call for evidence, the scope of the Good Food Nation Bill is limited, and should be expanded to truly deliver a Good Food Nation for Scotland. This Bill is an opportunity to improve the food environment in Scotland and it should set out a strategic vision for the food system in Scotland. Central to that vision must be a food system that supports easy access to healthy, nutritious and sustainable food for everyone. The Bill should interface with and support other legislation, such as the forthcoming Public Health Bill, and provide a framework and pathway for ensuring access to healthy food and overall health for all. The food system must be the foundation for delivering healthy weight in society.

Further, we would also like to see robust targets included on the face of the Bill. Targets are important for coordinating activities across different policy areas and for clearly outlining a direction of travel. Without targets in the Bill, it is difficult to see how the policy coherence required to deliver the required change can be established. We would like to highlight that the targets we are calling for are not targets on new items – they relate to existing commitments by the Government and goals which are already monitored. The targets we would like to see included in the Bill are:

- **Halve childhood obesity by 2030.** Formalise the ambition that already exists within Scottish Government documentation to halve childhood obesity by 2030 (based on 2016 baseline). This is a key measure of childhood and future health. It is related to inequalities and rights to food issues as we know childhood obesity is clearly patterned on deprivation with a significant and growing inequality gap.
- **Achieve the Scottish Dietary Goals by 2035.** Scottish Dietary Goals²⁰ already exist and are monitored through various established mechanisms by Food Standards Scotland. The dietary goals are based on a rigorous review of evidence to be health based and as such are the only way to measure progress towards the target of the GFN Bill that *"the most intractable dietary-related diseases will have begun to decline"*. This target would also allow the food system and national and local food plans to understand and be accountable for dietary shifts needed for health. It will also ensure that suppliers *"have developed their offering so that local increasingly equals fresh, healthy and environmentally sound"*.

The targets help to guide future policy development and can help to inform and influence secondary legislation.

About us

Obesity Action Scotland provide clinical leadership and independent advocacy on preventing and reducing overweight and obesity in Scotland.

For any enquiries relating to this submission, please contact Jennifer Forsyth
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¹⁹ <https://www.obesityactionsotland.org/media/1684/20211222-oas-response-raine-committee-call-for-view-gfn-bill-january-2022-final.pdf>

²⁰ Food Standards Scotland 'What are the Scottish Dietary Goals and what are they used for?'
https://www.foodstandards.gov.scot/downloads/Scottish_Dietary_Goals_-_Adapt_it_sheet.pdf