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**Sustain’s response to the consultation on Good Food Nation October 2014**

**About Sustain**

Sustain: The alliance for better food and farming advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. Amongst our projects and campaigns are:

* **Sustainable Food Cities:** whichis a network of local food partnerships taking a holistic approach to the food system by bringing together local government, community groups and businesses. This partnership was established by Sustain with the Soil Association and Food Matters and currently has members across the UK. This is currently run in tandem with our Sustainable Fish Cities campaign which is supporting places around the UK to improve the fish served up through catering.
* **Children’s Food Campaign:** whichaims to improve young people’s health and well-being through: Good food and real food education in every school; protecting children from junk food marketing; clear food labelling that everyone, including children, can understand. Over 150 organisations support the campaigns work.
* **Real Bread Campaign:** which campaigns for better bread in Britain. It does this by running a supporter network to unite everyone who bakes, or simply loves, Real Bread; Challenging examples of what we see as misleading marketing of industrial/supermarket loaves; and Helping to raise awareness of issues around additives and hidden processing aids. The Real Bread Campaign has almost 1500 members, mainly from the UK.
* **The Big Dig:** which organises national events across the UK that aim to raise the profile of community gardens and encourage more people to take part. The next big event will be The Big Dig Day in March 2015.**Sustainable Food Guidelines:** which provide some valuable pointers for institutions and businesses - http://www.sustainweb.org/sustainablefood/

This submission does not represent the detailed views of all our member organisations, many of whom we understand have put in their own submissions.

We welcome this document’s vision, and are pleased to see that this document shows a progression from *Recipe for Success* and a broader acceptance of the wider impact of the food system incorporating social, health and environmental concerns. However, there is a lack of recognition of the challenges and tensions in pursuing this wider agenda, and balancing the above concerns with economic growth. There is also a lack of detail in how this vision will be achieved. We would like to see a clear timescale of how and when the commission will be established, and a date by which it will provide a detailed plan of action to accompany the framework this document provides.

 **Specific comments**

1. How important do you think it is that we aim to be a Good Food Nation?

This is a good aspiration as a whole, and one that we hope will inspire other parts of the UK follow suit in creating their own visions for the food system. As noted in our answers below, we have some suggestions about the focus under this title.

2. How would we know when we had got there? What would success look like?

See question 4

3. Do you agree with the proposed vision? How would you improve it?
There are many elements to applaud about the vision, notably the aim for a decline in diet-related diseases, the recognition of the key role of the public sector and that local Scottish supply should be ‘fresh, healthy and environmentally sound’. What it doesn’t identify are the difficult compromises that will come in supporting a food industry much of which is based on supplying food which isn’t currently healthy or environmentally sound and is leading to the diet related diseases the vision aims to overcome. Whilst a vision isn’t the place to detail how you overcome these potentially conflicting objectives, it may be worth recognising here that there is a challenge in linking both economic growth with these other considerations, one that is worth pursuing and fundamental to the success of Good Food Nation, but one that could be more clearly recognised up front.

4. How would your life be better? What does being a good food nation mean in your

locality?
We are not based in Scotland, but we work with many groups and organisations who are. We are a founding member of Sustainable Food Cities network (outlined at start of document), and the vision we have put forward in this, we feel has a resonance here:

Imagine a place:

* Where every nursery, school and college, every hospital and community care setting, every restaurant and work place canteen serves healthy and sustainable meals (see Sustainable Food Guidelines mentioned earlier).
* Where everyone has access to affordable healthy and sustainable food within 500 metres of where they live, no matter where they live.
* Where good food is visible and celebrated in every corner – in local markets, independent retailers and restaurants; at food festivals and events; in gardens, parks and borders; on the radio and in the papers.
* Where people of all ages and backgrounds are learning about and developing skills in growing, buying and cooking good food and are practically involved in creating a more positive food culture in their own community.
* Where healthy and sustainable food is embedded into local strategy and planning, policy and practice, and becomes a primary vehicle for public agencies in delivering positive social, economic and environment change.
* Where communities, NGOs and public sector bodies are working together with food producers, processors, retailers and caterers to transform food culture and the systems that support it… to make healthy and sustainable food a defining characteristic of their area.

To ensure that this happens at a local level, we believe Scottish government needs to take a lead and ensure these outcomes through a joined up and coherent national policy. We would be happy for you to adopt these aims in your workwhere you feel they are applicable.

5. Are there any other essential steps we need to take before setting out on this
journey?
It may be useful to contact those who used to be involved in running the original non-governmental London Food Commission (set up by Tim Lang - t.lang@city.ac.uk - and Tim Lobstein, now at World Obesity - tlobstein@worldobesity.org) and the current incarnation of an officialbody, the London Food Board (Contact Mark Ainsbury mark.ainsbury@london.gov.uk or Jonathan Pauling jonathan.pauling@london.gov.uk). Whilst the context is different, the breadth of issues and stakeholders covered by the proposed Food Commission for Scotland, and the challenges it faces, are very similar and may warrant an exchange of ideas, particularly at this stage. Sustain has facilitated a similar exchange with Community Food and Health Scotland almost ten years ago with a local project focus, and they have organised another exchange recently with London projects.

6. How do you think a Food Commission could best help?

The influence that this new organisation could have depends partly on how well resourced it is, and how much freedom it is given. We hope that beyond being given budget to run necessary interventions, it will have the role of recommending the policy change required to make this vision a reality, and that this commission will be given the status by the government for its recommendations to be acted on. For example, there is a growing consensus amongst the public health community that in order to stem the rise in obesity, particularly in children, and diet-related diseases, that fiscal measures need to be considered. On a related note, the document doesn’t currently recognise the role that policy change can have, the importance of joined up policy across government and the recognition of where different policies are set (local, national and international, particularly EU level).

9. Do you agree with the proposed initial focus on:

• Food in the public sector

• A children’s food policy

• Local food

• Good food choices and

• Continued economic growth

10. Which other areas would you prioritise?

[Answered jointly]

We believe these areas provide a useful focus for action. We would particularly like to highlight the role that our Children’s Food Campaign could have in helping to provide information on good practice, and providing an existing alliance of expertise within the field of priority area two (p22).

Our only suggested alterations:

* There is a slight fuzziness over use of the term local food in the document. In the vision section earlier in the document (p5) there is a recognition that local food should be healthy and sustainable, but this is in relation to influencing Scottish supply, inferring businesses. The local food priority on p23 may be better termed ‘community food’, as it seems to relate to smaller scale, community run initiatives with a focus on locally grown food i.e. fruit and vegetables. We are pleased that both of these areas are covered in the report, but whilst there may be some small overlap, it may be worth clarifying that they have different needs and provide different benefits and do not automatically confer environmental or social benefits. Influencing existing (local) supply to become healthier and have higher environmental and animal welfare standards should be a major component of either priority three (local food) or five (continued economic growth), otherwise there is a danger that this part of the vision will not be realised.
* Linked to this, we believe that priority five falls short on the vision to achieve a healthier and sustainable food system. It is crucial that the commission works through Scotland’s food and drink sector to achieve these aims. However there is currently no recognition of this as a priority with this focus except for shortening supply chains.
* Earlier in the document (p17) the point is made about vulnerability of food supply given the climate challenges ahead. We would like to see that this is recognised through the priority actions, particularly ensuring adaptation in farming to respond to climate change, which would fit in either priority three or five. This should cover the need to diversify production, reduce imports of food and feed where possible to ensure a more resilient supply and enhance domestic production of fruit and vegetables where possible.
* We feel there is currently little recognition within the document of the importance of addressing food waste, and also of addressing food poverty. Both of these issues and their related consequences have been much better documented than we can do justice to in our response, suffice to say that addressing them will help to achieve the wider aims of the vision. In the first instance this may help reduce costs in supply chains, and increase amount of food available, and in the latter is a crucial part in improving people’s health, particularly the most needy. We have also found that these are two areas that people get passionate about, and may help engaging a wider audience, in order to get maximum involvement in realising the vision of Good Food Nation.
* We are intrigued by the thinking under priority point four about reducing radically the current plethora of definitions of what constitutes sustainable food. Whilst we share your frustration that it is a complex issue that is often made more complex by those involved, there may be a danger of losing some key messages within an oversimplification. At Sustain, we often talk about good food rather than sustainable food, as it is a term that has more resonance with most people. In this we sympathise with the approach you are already taking by calling for a Good Food Nation. As such, this (producing a simple definition of sustainable food) is a challenge that Sustain would be very willing to help you navigate.
* Related to this point, we would like to see more detail on what a good food choice looks like, and what outcomes are desired, particularly when considering wider sustainability issues. One area that would help to meet both the health and environmental aspirations of this document is a recognition of the role that eating less but better meat and dairy could have. We would suggest some work under priority four, to look at how Scotland can embrace a new ‘less and better’ meat culture – ensuring it is able to transition away from forms of meat supply which have high carbon emissions and use significant overseas land for feeds. Developing ways to encourage Scottish consumers to buy less and better meat should be part of this strategy as current levels have significant environmental and health implications. This could be part of the Good Food Choices strategy. Part of this would be how to promote better the great ruminant meat production systems Scotland excels in. The Eating Better Alliance will be able to help with the policy and evidence base for this.

13. What steps do you plan to take to help Scotland on the journey toward becoming a Good Food Nation – in the next month and in the next 12 months?

As mentioned at the start the majority of Sustain’s direct activities (beyond those of its members many of whom operate in Scotland) come through our projects and campaigns. Along with our partners in Sustainable Food Cities, we are keen to help support more towns and cities set up local food partnerships through which many of the priorities of Good Food Nation can be addressed. Our Children’s Food Campaign will be looking at the comparative strengths and weaknesses of approaches to public health across the four nations, in order to foster learning and encourage improvement. Through the Real Bread Campaign, Sustainable Fish Cities and Big Dig programmes, we will encourage participation from Scottish businesses, local government and community groups to play a part in improving their food systems.