

## Good Food Nation Consultation Response

The Scottish Government are currently consulting on the Good Food Nation proposals for legislation. The deadline for consultation responses is Thursday 18<sup>th</sup> April 2019.

Everyone with an interest in Scotland's food and drink industry is encouraged to respond to this consultation. Full details of how to do so can be found here: <https://consult.gov.scot/food-and-drink/good-food-nation/>

The DG Food and Drink response has been informed by the regional strategy development, experience of regional sector support and development, industry conversation and consultation with Dumfries and Galloway Council officers with experience of the regional food and drink industry. A copy of the DG Food and Drink response is below.

### Consultation question 1:

*To what extent do you agree with the framework proposals for Ministers and public authorities to prepare statements of policy, have regard to them in the exercise of relevant functions, and report on implementation, with regard to international obligations and guidance?*

Agree

An aspirational statement of policy relating to Good Food Nation is welcome, however we invite consideration that this should be enabling and empowering in nature. Specifically we request that care is taken to ensure that the excellent intentions of the Good Food Nation approach don't ultimately manifest in meaningless box tick-able outputs.

Scotland's people and places, and in particular its food and drink industry, are diverse in their needs, challenges and their opportunities. A prescriptive pan-Scottish approach that delivers recommendations and actions from the centre frequently disadvantages rural communities and rural enterprises through unintended consequences.

Food and drink is particularly important to the economies, communities and the culture of rural areas of Scotland, and so there is a particular need for rural proofing, localised application and empowered and resourced local delivery to be embedded within the framework. The best approach for Wigtownshire will be very different to the best approach for Leith.

We understand the Scottish Government's intention to mainstream rural into all policy making, but given the importance of the food & drink sector to many rural areas, it is particularly important that the rural impacts of these policy statements are fully explored.

The importance of natural capital to rural people, places and economies must also be reflected within statements of policies, with a commitment to supporting regenerative approaches to food production. There are growing concerns within our local food production sector about the negative

impacts of intensification, particularly in relation to biodiversity, animal welfare and soil degradation.

There is a clear opportunity for Scotland to be a global leader in pioneering approaches to food production and waste management that are meaningfully sustainable and which prioritise ecologically beneficial approaches. For example, the current siloed approach to food production sector support has meant that some of our more innovative and circular emerging food production businesses have found they are ineligible for support that is easily accessed by traditional production segments.

Food and drink is a hugely complex system that is disproportionately important to rural people and places. Therefore in drafting statements of policy Ministers should seek to ensure they do no harm through unintended consequences (however well meant) to fragile rural economies.

Dumfries and Galloway Council, in collaboration with DG Food and Drink, has recently published a food and drink strategy that aligns with Ambition 2030 and other local and national strategies, which seeks to frame delivery within a local context, recognising that regional needs are frequently not well reflected within national programmes and policies.

This has been a valuable exercise, clarifying common ground and collaborative opportunities across local and national partners, and reflecting the needs and opportunities of the local economic base, including local communities. However, this approach has taken considerable time and considerable consultation to get right. There is an obvious resource implication therefore for the proposed requirement for other public bodies to set out policy statements.

There is little point in undertaking this activity unless it is done meaningfully, and that will require resource. The approach taken must be enabling, empowering and meaningful across the board, and must at all costs avoid prescriptive box ticking.

**Consultation question 2:**

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

Agree

Agree however we would strongly encourage the Scottish Government to use the term enterprises rather than businesses when reflecting upon economic activity within the food and drink sector. This aligns with the new approach recommended by SoSEP in consideration of the diverse economic base in the rural south of Scotland. There are two main reasons for this.

Firstly, use of the term enterprises means the language is fully inclusive of community enterprises, social enterprises, charitable activities and not for profit activity - which is increasingly important to the sector, particularly at a rural, community and grassroots level.

Secondly, the term enterprises blurs the siloed description between profit motivated and purpose driven business activity in this sector. It is our experience in Dumfries and Galloway, particularly within the micro and small business sector, that there is a high proportion of value-led or purpose-driven business activity. Many of our 'businesses' are not necessarily hungry for growth or profit, but embed social purpose, sustainability and community benefit into their day to day business operations – exactly the mindset that a Good Food National Bill should encourage.

The use of the term business, and more precisely the commercial focus within many Scottish Government interventions within the food and drink industry, can be excluding to these purpose driven micros, SMEs and social enterprises.

Care must be taken that economic activity fully reflects the 'inclusive growth' pillar of Scotland's economic strategy by being inclusive of the full spectrum of economic activity within this sector.

There should also be an awareness by Ministers that to transform a food and drink system for the better takes care, consultation and time, which requires resourcing. Having recently completed the regional food and drink strategy for Dumfries and Galloway we have recent experience of how complex and time intensive this is. However, done well a collaborative vision of a Good Food approach, where everyone plays a part, could be transformational for Scotland.

### **Consultation question 3.**

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

Disagree

The food and drink economy and its wider social, health and cultural impacts are too complex an area to be only assessed through performance indicators. It requires an understanding of the whole system and how the system evolves, balances and functions to assess whether or not progress is being made - because progress in this area SHOULD be gradual if it is to be transformative in the long run.

Self appraisal against KPIs will see a race for quick wins and easy one size fits all solutions – this would be counter productive and possibly damaging to some sectors of the industry and some communities.

If Scotland is serious about becoming a Good Food Nation then it requires independent oversight. This is too important to do badly.

**Consultation question 4:**

*To what extent do you agree with the proposal for targeted legislation relevant to specific policy areas as an alternative to a single piece of legislation?*

Neither agree nor disagree

It is our experience that the 'how' is frequently more important than the 'what' in determining whether intervention will make a meaningful difference. How will activity be resourced, how will all stakeholders be consulted, who will be empowered and how will delivery reflect local needs and aspirations?

An aspirational vision for Scotland's desire to be a Good Food Nation is important, but how important is it to give this a legislative basis, versus targeted legislation related to policy areas? This is not something we have an opinion on.