

Respondent Information Form

Please Note this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy:
<https://www.gov.scot/privacy/>

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation's name

Food and Drink Federation Scotland

Phone number

07508 303 736

Address

4th Floor, Gordon Lamb House, 3 Jackson's Entry, Edinburgh

Postcode

EH8 8PJ

Email Address

Kirstv.tinsdale@fdfscotland.org.uk

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name
 Publish response only (without name)
 Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- Yes
 No

Food and Drink Federation Scotland response

Part A: Consultation on the national Good Food Nation Plan

Key points

- Food and Drink Federation (FDF) Scotland broadly supports the ambition that Scotland should be “a Good Food Nation”.
- The food and drink industry is rightly recognised in the national plan as a vital sector within Scotland’s economy.
- FDF Scotland is advocating for the plan to:
 - Create enough detail to avoid duplication and encourage regional collaboration between public sector bodies who will be required to create their own plans.
 - Recognise the need for increased support, investment and resource into the food safety regime in Scotland. This includes increasing the number of food safety professionals in local authorities and Food Standards Scotland.
 - Highlight the importance of having the right infrastructure and people and skills in place to support the future success of the industry.

It is critical that investment in the people, skills and resources to ensure our food is safe, authentic and well-regulated are added to the national plan.

- Local Authority Food Law Enforcement is facing significant challenges. Both financial and staffing resources have been reducing rapidly for a considerable period. Over the last five years there has been a 25% reduction in full time equivalent staffing for food enforcement. At the current rate of decline, there would be no officers involved in food law enforcement in Scotland by 2036.
- We are supportive of Food Standards Scotland’s Scottish Authorities Food Enforcement Rebuild (SAFER). SAFER is a programme to ensure the future delivery of an effective food law enforcement regime.
- It aims to achieve this across three broad objectives:
 - increasing resources to deliver food law, through enabling additional officers to become involved and ensure additional financial resources,
 - reducing demand by increasing business self-service and targeting intervention where most beneficial, and
 - increasing efficiencies, implementing digital solutions, utilising data and artificial intelligence.

The national plan should set clear direction for relevant authorities to create the local good food nation plans in a way that works well for the food and drink industry.

We ask for relevant authorities (which includes 32 Local Authorities and 7 health boards), to collaborate, avoid duplication and share best practice to meet local needs while looking at the wider national picture. If there were 39 slightly differing food and drink policies that could lead to unintended damaging impacts for our industry:

- Local plans should complement existing local initiatives e.g. Ayrshire local food partnership, set out in [Appendix 1](#).
- We welcome regional collaborative approaches e.g. Perth and Kinross Council and other local partners are working together to create a regional strategic plan. They have appointed a dedicated food officer to coordinate, create a snapshot of relevant

existing policies/programmes and will be forming a steering group in the coming months to agree the best way forward.

- The food and drink industry needs to be consulted and included in the development of these plans. Consultation should be done in a way that doesn't place undue burdens on industry.
- Local plans could allow positive growth in public procurement if implemented correctly.
- Local plans must avoid demonising any specific products/sectors within food and drink.

Good Food Nation Outcomes

FDF Scotland's feedback on the Good Food Nation Outcomes can be found below.

Outcome 1: Everyone in Scotland eats well with reliable access to safe, nutritious, affordable, sustainable, and age and culturally appropriate food.

- The Scottish Government needs to acknowledge the tension between affordable and sustainable. In many instances more sustainable food and drink production can be more costly.

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.

- We need to make it easier for trailblazing businesses to access the Scottish Industrial Energy Transformation Fund. This fund has helped to de-risk businesses to invest in projects that are helping them to decarbonise which is having a positive impact on Outcome 2. However, the future of this fund is unclear.
- There are two reserved matters the Scottish Government needs to be mindful of that are blockers to energy change in business which will make the transformation to renewable power more difficult:
 - There is not sufficient grid capacity connection to allow businesses to move to electricity.
 - The link between the renewable electricity price and gas prices is extremely problematic.

Outcome 4: Our food and drink sector 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.

- We need the Scottish Government to create the right infrastructure. This means making sure people have access to housing, schools, the NHS, broadband and transport. This will allow people to live in the areas that manufacturing jobs are available and that Scotland remains an attractive place to invest in food production.
- We need to ensure we have the people and skills to continue to produce the high quality and safe food that we are known for.
- We believe that the Scottish Government needs to take into account the fact that Scotland's food and drink industry needs to compete both in the UK and global marketplace.

- The Scottish Government’s consultation to restrict the promotion of food and drink high in fat, salt and sugar states that the impact of proposed regulations will “...lead to a net reduction in sales of food, with the fall in sales of restricted foods being larger than the compensatory increase in sales of non-HFSS foods. This reduction will feed back to manufacturers.” The Scottish Government’s proposals create a different set of trading regulations for businesses selling into the Scottish stores compared to that in other parts of the UK, disproportionately impacting small Scottish food and drink producers. This is in direct conflict with the importance of the economic growth of the food and drink industry as set out in Outcome 4.

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.

- This outcome doesn’t reflect our industry’s ambition – it is not about having a “reputation” for high quality food rather it should be that Scotland is a global leader in high quality and sustainable food production.

[FDF Scotland's suggested revisions to the list of outcomes, targets and indicators are summarised below.](#)

Good Food Nation targets and indicators

FDF Scotland’s feedback on the Good Food Nation targets and indicators can be found below.

General points

- Use of language:
 - The “outcomes” could be better described as “visions” or “mission statements”.
 - The “indicators” are outcomes.
 - The targets/other measures could be defined as goals. This may make it easier to define specific metrics to measure progress against.
- It is positive that the plan mentions the Scottish Government working with the UK Food Data Transparency Partnership on data collection for agri-food. Companies should not have to provide information multiple times, adding cost.

Outcome 1: Everyone in Scotland eats well with reliable access to safe, nutritious, affordable, sustainable, and age and culturally appropriate food.

- Continuing to produce safe food is vital to the health of our people and to the future success of our industry. We therefore advice the Scottish Government to add two food safety targets to the national plan to allow progress to be measured:
 - Reduce incidents relating to food-borne illness
 - Increase enforcement capacity of Local Authorities to deliver food safety and standards compliance

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.

- FDF Scotland hosts the [Strategic Net Zero Response Programme](#) on behalf of the Scotland Food & Drink Partnership. The programme is supporting the food and drink industry to meet the net zero challenge while ensuring a long-term sustainable future for our Industry.
- The programme is currently working on a project to map out the emissions in Scotland's food and drink supply chain which could provide a useful baseline to measure our progress towards net zero goals. This has been a complex and challenging process; our team are keen to share these learnings with the Scottish Government.
- We are interested to learn what will replace the 2030 greenhouse gas emissions target in the Good Food Nation Plan, given the Scottish Government announcement that it will no longer be a statutory target.

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

- We support the overarching outcome for Scotland's food system to encourage a physically and mentally healthy population, leading to a reduction in diet related conditions.
- We are pleased to see that recipe reformulation has been included as a key indicator towards this, as this is recognised as one of the most effective ways the food and drink industry can help improve dietary health. However, we suggest changing the reformulation indicator to focus on the impact of reformulation on dietary health rather than the number of companies investing in reformulation, as this links more closely to the Good Food Nation outcome.
- FDF Scotland's Scottish Government funded Reformulation for Health Programme is supporting SME food and drink businesses to reformulate their products in line with the current nutritional targets including [Salt Reduction 2024 targets](#), [Sugar Reduction Programme](#), [Calorie Reduction programme](#), [Scottish Dietary Goals](#), [health claims and front of pack labelling](#). To ensure maximum impact, the programme focuses on engaging with ingredient manufacturers, Scottish retail buying teams and wholesalers.
- Businesses are monitored regularly against each phase of their reformulation journey. All businesses engaged in the programme record baseline nutritional information and other sales data where available. Once a business has completed their reformulation project, they submit updated nutritional and sales data to calculate the impact of the project as follows:

*nutrient reduction x annual projected sales = impact
(e.g. 15g reduction of sugar x 100,000 units sold per year = 1,500kg of sugar removed)
1g of sugar = equates to 4kcal, therefore
1500kg equates to 6,000,000 kcal reduction
15g sugar reduction equates to 6million kcal reduction per annum*

This way of measuring impact could be used to demonstrate progress in reformulation under Outcome 3.

- To achieve the target to halve childhood obesity will require an evidenced based and holistic strategy. As part of this, we believe a whole systems approach is key – with all stakeholders across the system working together. Our [Reformul8 Partnership](#), as part of the Reformulation for Health Programme, provides a fantastic example of what can be achieved when multiple partners work together with the common goal of improving dietary health in Scotland.
- To deliver the ambitious targets set out within the plan, a more holistic approach is needed. Policy to date has largely focussed on reducing nutrients of concern (such as sugar, calories, salt), despite the fact that most of the top dietary risk factors are linked to elements of the diet that we do not get enough of including whole grains, fruit, legumes, nuts, seeds and fibre. To address this, in 2021 we launched our ‘Action on Fibre’ initiative, working with 25 brands to help make higher fibre diets more appealing, normal and easy for the population. This has already made a demonstrable difference - delivering an additional 7.2 billion servings of fibre to the population in the first year.
- To support this, we believe that more can be done to encourage and empower people to make healthier choices, and that Scottish Government should use positive, practical messaging to help people make healthier choices in their everyday lives.

Outcome 4: Our food and drink sector 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.

- There is a significant opportunity to drive productivity and ensure resilience in the food and drink sector by fostering investment in innovation and technology. This will support the creation of more high-quality jobs and economic growth.
- There are a number of high-level indicators we suggest adding to this outcome relating to [Scotland’s food and drink industry strategy: Sustaining Scotland. Supplying the World:](#)
 - **Business confidence** – businesses feel they can grow, and their knowledge and commercial competency is increasing.
 - **Resilience** – increase in businesses’ ability to react, adapt, and recover to unexpected factors.
 - **Productivity** – increase in Gross Value Added (GVA) is important, we suggest adding investment in research and development, leading to increased automation.
 - **Reduction in emissions** – the industry is on track to achieve Net Zero by 2045.
 - **New entrants** – the number of new businesses being created and the overall survival rate.
 - **Industry growth** – increase in industry turnover.
 - **Investment** – increased investment in critical areas of infrastructure.
 - **Foster greater levels of innovation** - with links to Scotland’s world-leading research and academic base.

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

- The policies, targets and indicators related to this outcome do not reflect our understanding of ‘food culture’.
- [UNESCO](#) has a list of food cultures from around the world as part of its “intangible cultural heritage” which includes e.g. “beer culture in Belgium” or “the Mediterranean diet” or “Artisanal know-how and culture of baguette bread” in France.
- We suggest this could be a great starting point for the National Good Food Nation Plan and could help the local authority/health board plans to safeguard and celebrate some of Scotland’s most treasured local delicacies.
- On a more tangible note, food culture provides an economic opportunity through tourism. It would be useful to link tourism-related policies and indicators to this outcome.

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.

- Both the policies and indicators linked to this outcome miss any reference to exports.
- We suggest this is added to reflect [Scotland’s ambition is to remain the largest food and drink exporter in the UK](#).
- The Scotland Food & Drink partnership is developing an export strategy as a follow on from the report: [Phase two of Scotland’s food and drink industry export plan, 2019-2024](#). This will include targets and indicators that can be linked to this outcome.

FDF Scotland’s suggested revisions to the list of outcomes, targets and indicators are summarised below.

Scottish Government Good Food Nation National Plan: Outcomes, indicators and targets

FDF Scotland feedback/comments are in red

Outcome	Indicators	Targets/other measures
1. Everyone in Scotland eats well with reliable access to safe, nutritious, affordable, sustainable, and age and culturally appropriate food.	<ul style="list-style-type: none"> • Proportion of households experiencing household food insecurity • Number of pupils registered for free school meals • Percentage of pupils present at school taking school meals (free or paid for) • Number of day care settings and children registered to the Scottish Milk and Healthy Snack Scheme • Proportion of children in Scotland living in: relative poverty; absolute poverty; combined low income and 	<ul style="list-style-type: none"> • Fewer than 10% of children living in relative poverty by 2030 • Fewer than 5% of children living in absolute poverty by 2030 • Fewer than 5% of children living in combined low income and material deprivation by 2030 • Fewer than 5% of children living in persistent poverty by 2030 • Halve childhood obesity by 2030 and significantly reduce associated diet-related inequalities • Reduce adult diet-related health inequalities

	<p>material deprivation, and; persistent poverty (after housing costs)</p> <ul style="list-style-type: none"> • Scottish Dietary Goals • Proportion of public and private sector food businesses implementing the Eating Out, Eating Well framework and code of practice for children’s menus • Number of local authorities that participate in the Food for Life Scotland Programme 	<ul style="list-style-type: none"> • Reduce the number of households facing moderate to severe food insecurity • Reduce the reported number of households accessing emergency food provision • Continuing to produce safe food is vital to the health of our people and the future success of our industry. We therefore advise the Scottish Government to add two food safety targets to the national plan to allow progress to be measured: <ul style="list-style-type: none"> ○ Reduce incidents relating to food-borne illness ○ Increase enforcement capacity of Local Authorities to deliver food safety and standards compliance
Outcome	Indicators	Targets/other measures
<p>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.</p>	<ul style="list-style-type: none"> • Greenhouse gas emissions produced by the agriculture sector We suggest adding the rest of the food and drink industry to this indicator as it is vital the full food chain and Scottish Government works together to achieve net zero. FDF Scotland’s Net Zero Programme is currently working on a project to map out the emissions in Scotland’s food and drink supply chain which could provide a useful baseline to measure our progress towards net zero goals. • Use of nitrogen fertilisers • Percentage of commercial stocks fished at sustainable levels • Scottish Dietary Goals 	<ul style="list-style-type: none"> • Reduce per capita food waste by 33% by 2025 • Aim to double the amount of farmland managed organically in Scotland by end of this parliamentary term (2026) • Existing legally binding annual emissions reduction targets including: 75% reduction in greenhouse gas emissions by 2030 (compared with a 1990 baseline), and net zero emissions by 2045 • Scottish Ministers have international commitments to address biodiversity loss, articulated in the Global Biodiversity Framework of the UN Convention on Biodiversity, which includes targets relating to reducing the global footprint of consumption, global food waste, overconsumption and waste generation • The Scottish Government have made a #123 Food Loss and Waste Pledge for Climate Action

Outcome	Indicators	Targets/other measures
<p>3. Scotland's food system encourages a physically and mentally healthy population, leading to a reduction in diet-related conditions.</p>	<ul style="list-style-type: none"> • Percentage of adults and children with a healthy weight • Percentage of children at risk of obesity • Percentage of adults and children consuming recommended 5 portions of fruit and vegetables each day • Number of local authorities that participate in the Food for Life Scotland Programme • Fruit and vegetable intake of children aged 2-15 • Scottish Dietary Goals • Proportion of public and private sector food businesses implementing the Eating Out, Eating Well framework and code of practice for children's menus • Number of companies investing in reformulation <p style="color: red;">We suggest changing this indicator to focus on the impact of reformulation on dietary health rather than the number of companies investing in reformulation. We have suggested how this indicator could be used to measure success (see above in our comments related to the indicators and targets).</p>	<ul style="list-style-type: none"> • Reduce drop off in breastfeeding rates at the 6 to 8 week point by 10% by 2025 • Halve childhood obesity by 2030 and significantly reduce associated diet-related inequalities • Increase levels of adult healthy weight • Reduce adult diet-related health inequalities
Outcome	Indicators	Targets/other measures
<p>4. Our food and drink sector 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.</p> <p style="color: red;">Safe food needs to be part of this outcome. As continuing to produce safe food is vital to the health of our people and the future success of our industry.</p>	<ul style="list-style-type: none"> • Number of people employed in the food and drink industry • Number of people employed in agriculture • Value of Scottish food and drink exports • Value added by the Scottish food and drink industry • Number of registered food and drink enterprises • Number of registered crofts • Median weekly full-time earnings across the Scottish food and drink growth sector • Number of companies investing in reformulation <p style="color: red;">As with Outcome 3 we suggest changing this indicator to focus on the impact of reformulation on</p>	<ul style="list-style-type: none"> • The Scottish Government supports the food and drink sector by providing funding for Sustaining Scotland. Supplying the World – The Food and Drink Industry Strategy

	<p>dietary health rather than the number of companies investing in reformulation.</p> <ul style="list-style-type: none"> • There are a number of indicators we suggest adding relating to Scotland's food and drink industry: Sustaining Scotland. Supplying the World (see above in our comments related to the indicators and targets). 	
Outcome	Indicators	Targets/other measures
<p>5. Scotland has a thriving food culture with a population who are interested in and educated about good and sustainable food.</p> <p>The policies, targets and indicators related to this outcome don't reflect 'food culture'. More details are included in our comments related to the indicators and targets above.</p>	<ul style="list-style-type: none"> • Funding committed to food education and community food projects • Scottish Dietary Goals • Proportion of public and private sector food businesses implementing the Eating Out, Eating Well framework and code of practice for children's menus • Food culture provides an economic opportunity through tourism. It would be useful to link tourism-related policies and indicators to this outcome. 	<ul style="list-style-type: none"> • Halve childhood obesity by 2030 and significantly reduce associated diet-related inequalities • Increase levels of adult healthy weight • Reduce adult diet-related health inequalities
Outcome	Indicators	Targets/other measures
<p>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.</p> <p>Safe food needs to be part of this outcome. As continuing to produce safe food is vital to the health of our people and the future success of our industry.</p> <p>Suggest changing 'Scotland has a global reputation' to 'Scotland is a global leader'. This would better reflect our industry's ambition that Scotland is a global leader in high quality and sustainable food production.</p>	<ul style="list-style-type: none"> • Number of engagements with international colleagues on food system • Greenhouse gas emissions produced by the agriculture sector • The Scotland Food & Drink partnership is developing an export strategy as a follow on from report: Phase two of Scotland's food and drink industry export plan, 2019-2024. This will include targets and indicators that can be linked to Outcome 6. 	<ul style="list-style-type: none"> • Existing legally binding annual emissions reduction targets including: 75% reduction in greenhouse gas emissions by 2030 (compared with a 1990 baseline), and net zero emissions by 2045 • Scottish Ministers have international commitments to address biodiversity loss, articulated in the Global Biodiversity Framework of the UN Convention on Biodiversity, which includes targets relating to reducing the global footprint of consumption, global food waste, overconsumption and waste generation • The Scottish Government have made a #123 Food Loss and Waste Pledge for Climate Action

FDF Scotland comments on food processor snapshot box

Snapshot Box: As a food processor in a Good Food Nation

- I work with producers, wholesalers, retailers and out of home food providers to ensure resilience along the whole supply chain while meeting demand and minimising waste
- I make my products healthier and more sustainable, using fresh, seasonal ingredients where possible, and can access support to do this.
- I invest in and develop my workforce, ensuring they can enjoy opportunities to enhance their skills whilst benefiting from a safe working environment
- I contribute to the important role that the food and drink sector has in Scotland's economy

- We feel that there are two very important elements missing from the food processor snapshot box:
 - Food safety and compliance of food legislation - continuing to produce safe food is vital to the health of our people and to the future success of our industry.
 - The importance of businesses being profitable – businesses need to be profitable to provide high quality jobs and to contribute to Scotland's economic growth.

Further comments on the national Good Food Nation Plan

- It is positive to see FDF Scotland's Scottish Government funded Reformulation Programme mentioned within the plan. The programme is [removing billions of calories and tonnes of salt from Scotland's everyday foods](#). To ensure the long-term future of this programme, we would like the Scottish Government to commit 3 years of funding (total cost around £400k).
- Businesses need the right skills and people in place to ensure we continue to produce the high-quality, safe food we are known for; and to support Scotland's economic growth:
 - The Scottish Government removed funding from the Flexible Workforce Development fund in 2023/2024 and 2024/2025. Food and drink companies found the fund helpful in accessing funded training courses and bespoke programmes that met the needs of their businesses.
 - It is positive to see the work of the Scotland Food & Drink Partnership's Skills Advisory Group mentioned in the plan. Our Scottish Government funded skills programme – A Future in Food – is one of the lead partners driving this work forward.
- The Strategic Net Zero Response Programme that FDF Scotland hosts on behalf of the Scotland Food & Drink Partnership can support delivery of the net zero ambitions within the Good Food Nation plan. The programme has an important role to play in ensuring the industry is on track to achieve Net Zero by 2045.
- The Food Processing Marketing and Cooperation Grant Scheme is highlighted by the Scottish Government as a vehicle to support Scotland's journey towards becoming a Good Food Nation however the future of the fund is uncertain.

- We are supportive of the work of the Scottish Government's Food Security Unit to build additional resilience into the food system. We are keen to bolster the work of the unit to help respond agilely to possible future shocks.
- It is vital that the food and drink industry is represented at the Scottish Food Commission given the important part the commission will play in scrutinising both the national and local plans.
- FDF Scotland is keen to be part of the official Good Food Nation Working Group that is mentioned within the plan.

Appendix 1. Case study – Ayrshire Economic Partnership – food and drink plan

The plan supports Ayrshire's food and drink sector and help it grow now and in the future by embracing new trends and technology, understanding and developing the supply chain from primary agriculture and growing, through manufacturing, wholesale and distribution.

The plan has a balanced focus between environment, business and community on the aims of the following 4 areas of ambition, starting with the current state and delivering the priorities through the actions outlined for each:

1 Facilitate business resilience and growth

2 Support sector growth and build routes to market

3 Promote the Ayrshire food and drink sector as a great career with many varied opportunities and pathways

4 Encourage sustainability

This co-produced plan is being co-delivered for the benefit of businesses and communities by the Ayrshire Economic Partnership's Food & Drink team with support from a wide range of stakeholders including South, North and East Ayrshire councils, Ayrshire Chamber of Commerce and industry.

Part B: Consultation on specified functions for the national Good Food Nation Plan

- We welcome the inclusion of the Food (Scotland) Act within the list of specified functions.
 - It is important to note that the main aspects of the Food Safety Act are food safety, authenticity, consumer protection and their enforcement.
 - All of these elements are an important part of a Good Food Nation and should be part of this item on the specified functions list.
- We ask the government to consider whether the draft plan has covered all the relevant powers public bodies have to support or regulate food and drink businesses including environmental, marine and general business regulation.