

FDF Scotland submission to Scottish Government Consultation on Proposals for Good Food Nation Legislation

This submission is made by the Food and Drink Federation (FDF) Scotland. FDF Scotland represents the food and drink manufacturing industry in Scotland. We are Scotland's largest manufacturing sector, accounting for 30% of total manufacturing turnover and our gross value added to the economy is £3.8bn, representing 29.7% of Scottish manufacturing value added. We have 1,015 food and drink manufacturing businesses, employing 45,000 people, which represents 25% of the Scottish manufacturing workforce.

We welcome the opportunity to comment on the proposals outlined in this consultation.

FDF Scotland and our members are committed to a responsible and flourishing food and drink industry in Scotland. We are part of the Scotland Food and Drink Partnership board and are working in collaboration with the industry, public sector and government to double the sector's turnover to £30bn by 2030.

Q1: 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?

FDF Scotland responded¹ to the initial discussion Good Food Nation discussion document in 2014 where we outlined our general support for the policy but asked for clarification on the definition of "good food".

We are broadly supportive of the Scottish Government's aim to ensure the Scottish Food industry is world leading in terms of ethics, sustainability and quality and we are grateful for their on-going support of the industry.

However, we remain unclear as to exactly what the definition of "good food" is and ask for the Scottish Government to define this before moving ahead with legislation.

Q2: 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?

We agree that Government should encourage and enable businesses to play their part.

FDF Scotland is proud to deliver the Scottish Government funded programme "A Future in Food". Since 2012 has delivered huge impact in Scotland including:

¹ <http://www.fdfscotland.org.uk/sfdf/SFDF-Response-to-Becoming-A-Good-Food-Nation.pdf>

- 40,000 pupils accessing information about careers in food and drink (through careers fairs, taking part in industry challenges, talks, workshops)
- Over 5000 teachers accessing information about careers in food and drink, the skills required by employers and how their subject can access a career in the industry (through CPD, workshops, conferences)
- In excess of 200, 000 downloads of careers resources,

The successes of this programme demonstrate a clear link with the Good Food Nation Vision to ensure that “*food companies are a thriving feature of the economy and places where people want to work*” We ask that the Scottish Government continues to fund the programme to ensure this project can continue.

FDF Scotland is also delighted to be delivering Scottish Government-funded support for SME food businesses across Scotland to make their products and recipes healthier to help tackle obesity and ensure that Scottish producers are making products that are “*increasingly healthy*” as outlined in the Scottish Government’s Healthier Futures strategy. If this programme is also success we would be keen to seek ongoing Government support and funding to continue to help Scottish businesses respond to consumer demand for healthier products.

Q3: To what extent do you agree with the proposed approach to accountability of Scottish Ministers and specified public authorities?

We urge caution - although we welcome the Scottish Government’s decision not to require private sector businesses to set out a statement on food policy, it is likely that the relevant public authorities will simply pass on the reporting requirements to their food and drink suppliers. This could place further auditing and reporting burdens on the one of the most heavily regulated industries in Scotland.

This could have the unintended consequence of putting off smaller local suppliers from applying to public sector contracts as the reporting could end up being too onerous. We suggest the government reviews the reporting systems that are currently used within the food and drink supply chain to see if these could be applicable to the reporting requirements.

Q4: 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?

We welcome this approach as it does allow flexibility in a sector that is highly dynamic and will be undergoing a transformation in the coming years. We ask the Scottish Government to continue to engage with FDF Scotland and our members when considering food policy as manufacturers continue to face a cumulative burden of policy initiatives on taxation, workplace parking, deposit return, business rates, food legislation in a post-Brexit Scotland etc.

The following Associations actively work with the Food and Drink Federation:

ABIM	Association of Bakery Ingredient Manufacturers
ACFM	Association of Cereal Food Manufacturers
BCA	British Coffee Association
BOBMA	British Oats and Barley Millers Association
BSIA	British Starch Industry Association
BSNA	British Specialist Nutrition Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers' Association
FCPPA	Frozen and Chilled Potato Processors Association
FOB	Federation of Bakers
GFIA	Gluten Free Industry Association
PPA	Potato Processors Association
SA	Salt Association
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SSA	Seasoning and Spice Association
UKAMBY	UK Association of Manufacturers of Bakers' Yeast
UKTIA	United Kingdom Tea & Infusions Association Ltd

FDF also delivers specialist sector groups for members:

Biscuit, Cake, Chocolate and Confectionery Group (BCCC)
Frozen Food Group
Ice Cream Committee
Meat Group
Organic Group
Seafood Industry Alliance