**Response to Agriculture, Food and Rural Communities Directorate,** submitted by email to:goodfoodnation@scotland.gsi.gov.uk

Department for Social Responsibility and Sustainability

The University of Edinburgh

9 Hope Park Square, Meadow Lane,

Edinburgh EH8 9NP

Phone: 0131 651 5588

Date: 8 October 2014

Dear Jonathan Pryce,

**Response to the Scottish Government Good Food Nation consultation from the University of Edinburgh**

Please find attached our response to your discussion document ‘Recipe for Success: Scotland’s National Food & Drink Policy – Becoming a Good Food Nation’. The University welcomes this initiative, recognising that we have an important role to play – both as an institution and as a leading research and teaching organisation – in transforming Edinburgh into a sustainable food city and a model for other regions to follow. As such, we fully support and endorse Scottish Government’s ambition in this regard and believe that the public sector has a responsibility to demonstrate clear leadership.

The University of Edinburgh, established in 1583, has an international reputation for research excellence and innovation and consistently ranks in the world's top 50 universities. With over 40,000 students and staff, and an estate comprising over 400 buildings on five sites across the city, we aim to create new fields of knowledge and make a difference to the societal, cultural, health, environmental and wealth development of communities in Scotland, the UK and across the world.

We are committed to being a world leader in addressing global challenges such as poverty, climate change and the growing demand for energy, food and water, and to embedding the values of social responsibility and sustainability not only in our operational activities but in our research and curricula so that our students develop a clear understanding of their importance locally, nationally and internationally.

While we welcome the Scottish Government’s aspiration that Scotland should become a Good Food Nation where it is second nature to serve, sell and eat nutritious, fresh and environmentally sustainable food, we feel that there are a number of issues to be resolved in order to deliver on this vision. We therefore have some points for consideration and some concerns including:

* The absence of a definition that clearly sets out what is meant by “good” food in environmental or social terms
* The absence of a position on organic farming and links between food production and bio-diversity or soil or habitat conservation
* The need for in-depth consideration of how European Agriculture and Fisheries Funds (of more than £500 million) could be used to develop a more sustainable food and fisheries system which can deliver public benefits in environmental, cultural, public health and economic terms
* The need for greater focus on the role of cities in our food system
* The risk of drift / loss of focus in a crowded marketplace for ideas and calls on resources
* Competing calls on diminishing public funds and staff resource constraints

We offer assistance alongside Nourish Scotland and the Edinburgh Food for Life Partnership in working to raise awareness of food issues, lobby decision makers, and co-operate in developing local solutions and look forward to participating in the next stage needed to develop the discussion into a shared action plan.

Yours sincerely,

Dave Gorman,
Director of Social Responsibility and Sustainability

To discuss our response further, please contact David Somervell, Head of SRS Futures.
+44 (0)131 650 2073 david.somervell@ed.ac.uk

## **Consultation Response from the University of Edinburgh**

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

***The Edinburgh Food for Life Partnership (EFFLP) is a major collaboration between the City of Edinburgh Council, NHS Lothian and the University of Edinburgh, working with Soil Association Scotland to explore how we can best support sustainable and healthy food systems within our procurement and catering services across Scotland’s capital.***

***EFFLP is a sub group of the Edible Edinburgh initiative, a cross-sector partnership established in 2013 to transform Edinburgh into a sustainable food city. Edible Edinburgh is a recognised partnership under community planning arrangements in the city.***

***We would like it noted that all EFFLP partners have also contributed to a separate response to this consultation as part of the Edible Edinburgh initiative. Our response as the EFFLP is therefore focused principally on the role of the public sector within a Good Food Nation and the structural or policy changes that might be needed to support this.***

***We believe that becoming a Good Food Nation is imperative and that organisations in the public sector (and publicly funded bodies) have a vital role to play. As such, we fully support and endorse the Scottish Government’s ambition in this regard. We believe the public sector has a responsibility to demonstrate clear leadership. This partnership has demonstrated significant progress already, as detailed in section 13 of this response.***

***The EFFLP partners would be keen to enter discussions with the Scottish Government about how we can jointly support Edinburgh becoming a “banner city” for a Good Food Nation, as an exemplar and to develop a model for other regions to follow.***

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

***In general terms, success will come when all the people of Scotland have access to, and choose to eat, the very best of Scotland’s food: whether at home, at school, at university or elsewhere.***

***For us, the best of Scotland’s food means fresh, sustainable produce from our fertile soils and productive, clean waters. It is healthy, seasonal and supports a thriving agricultural industry as well as the wider food and drink sector. It is therefore good for people, places and the planet.***

***Specific examples of healthy and potentially sustainable foods we can produce in Scotland, and which our cooks should be using to create tasty, healthy meals include:***

* ***Vegetables - roots (carrots, potatoes, turnips, onions etc.) and plants (salads, broccoli, mushrooms, sweetcorn, kale, cabbages, squashes, tomatoes, courgettes, peas/beans etc.)***
* ***Fruits – a range of berries and orchard fruits (with near year-round availability for berries, particularly if frozen)***
* ***Dairy – a range of cheeses, eggs, milk, yoghurts, cream and butter***
* ***Meat - beef, lamb, pork, game, poultry (incl. turkey) and venison***
* ***Fish - farmed salmon, trout and other fish plus a wide range of wild & sustainably caught fish and seafood from Scottish waters.***
* ***Grains - oats, wheat, barley and more***

***Producing, buying, cooking and eating more of this kind of food will bring significant benefits to Scotland’s economy, its environment, and the health and wellbeing of its people.***

***We recognise that these benefits will be even greater if more of our food and drink is produced using environmentally sustainable systems so we eat more fish which is Marine Stewardship Council certified and more food and drink which is certified Organic, or from recognised systems of lower input farming.***

***Within the public sector specifically, we believe success can be achieved if we lead by example, serving increasing levels of sustainable, locally sourced, freshly prepared and healthy food to our patients, service users, students, staff and customers. This will in turn help people to make healthy, sustainable choices when using our services as well as encouraging good food choices at home.***

***We believe success for the public sector centres around three key elements:***

***1. The nature of food and drink procurement.***

***The public sector must have the resources and capability to source the best of Scotland’s food and drink. This means sustainable, healthy produce that is good for the economy, with significant social and economic returns on the investment made. We recognise that, as set out in the Scottish Government’s Assessment of Regional Cross Sectoral Collaborative Approach (2012:***

***“… of all the products that the public sector purchases, food is the one that can generate benefits not only to the organisation, but also to society, the economy and the environment. Food is very important to the health of Scotland’s economy but more importantly to the health of its people. Food is different from other products procured by the public sector in that it can deliver additional benefits and therefore should be treated differently.”***

***By changing what we buy, cook, and serve in the public sector we have an enormous opportunity to boost Scotland’s health and wellbeing, our economy and our environment. We believe that to achieve this food and drink should be better recognised as being different to other goods and services in terms of procurement policy.***

***It is different because food is essential for life. It connects all of us to the land and sea, which we depend on to produce it. The food system directly impacts biodiversity, soil and water quality, as well as the quality and diversity of jobs through production, processing, retail and foodservice. Our food systems therefore have a direct impact on the health of people and planet. We have a tremendous opportunity to positively influence this impact but this requires change and support at a national level.***

***2. The quality and consistency of our catering services.***

***Cooks, catering staff and management throughout the public sector must be equipped with the tools they need and trained sufficiently to use those tools to produce high quality meals using the best Scottish ingredients in facilities that are fit for purpose. They should be able to tell consumers about where the food comes from and how it was produced to inspire greater enjoyment of and engagement with what is eaten.***

***3. The relationship we establish with those who use our services and eat our food.***

***There must be trust and understanding from the public in terms of the food we provide. We must become the default option for people when in our care or using our services, because they recognise that, firstly, we all benefit from using Scottish and sustainable produce and, secondly, the quality of the food served is second to none.***

***To achieve these three key elements of success requires transformative change in public food and drink procurement policy but also the full breadth of national and local policies and activities concerning all aspects of food provision in the public sector - from producers, along the supply chain, into the kitchens and onto peoples’ plates.***

***This means exploring, among other things, a variety of challenging issues, for example:***

***Hospitals***

* ***Continued development and implementation of the Health Promoting Health Service initiatives focusing on increasing the availability of more healthy food and snack choices in all healthcare premises including those operated under contract.***
* ***Health Boards continuing to demonstrate high levels of compliance with the Food Fluid and Nutritional Standards***
* ***Health boards should be enabled to achieve the Food for Life Catering Mark, with its focus on supporting and encouraging progress towards more local, ethical and healthy catering menus.***
* ***Achieving a national catering strategy for the NHS in Scotland which recognises and uses the relationship between food and health to drive health improvement in a measurable way.***

***Schools***

* ***Exploring the impact of Local Authorities aiming to improve the health and sustainability of their schools’ food whilst at the same time secondary schools are directly competing with food outlets on Scottish high streets.***
* ***Considering whether it is in our nation’s best interests for most secondary school pupils to remain permitted to leave school grounds at lunchtime with little or no restriction on the types of food served to them nearby.***
* ***Considering whether secondary schools serving tray-bakes and sausage or bacon filled rolls at morning break-time undermines the good food provided at lunchtime as well as the work across schools to educate children about good food.***
* ***Ensuring a balance within school food provision between providing food that children want to eat and providing food that we as a society agree our children should be eating and educating them sufficiently for them to accept and enjoy that food when it is on offer.***
* ***Engaging parents and pupils across Scotland so they recognise that, provided the school food meets nutritional guidelines, and certainly if it holds the Soil Association’s Food for Life Catering Mark award, there is no better option for lunch than a school meal.***
* ***Exploring ways to improve the financial viability of school food catering with increasing uptake a key metric, allowing for investment in better quality food, more skilled staff and more modern equipment.***

***Higher and Further Education (Universities & Colleges)***

* ***Supporting universities and colleges across Edinburgh and beyond to help them procure and provide sustainable, healthy food to students so they leave with a positive impression of Scottish food which they can share within their communities and, in the case of foreign students, across the world.***
* ***Exploring how universities and colleges might better meet their social responsibility and sustainability objectives concerning issues such as food security, environmental sustainability, health and nutrition and supporting local communities.***
* ***It is clear that, as a direct result of dietary improvements from having better access to healthy, sustainable and local food within the public sector the people of Scotland will experience improved health and wellbeing across society with declining levels of obesity and weight-related health issues, including mental health issues. This positive change will clearly be greater if all sectors play their part, which will likely require further policy drivers.***
* ***Communities will no doubt be strengthened economically and socially by having greater local food provision from nearby farms, suppliers and retailers, with a greater proportion of jobs available within the food and drink sector.***

***3. Do you agree with the proposed vision? How would you improve it?***

***We agree broadly with the proposed vision but would suggest a change from:***

***“All players in Scottish life – from schools to hospitals, retailers, restaurants and food manufacturers – will be committed to serving such food”***

***to…***

***“All players in Scottish life – from our food producers, suppliers and manufacturers to places that serve food including our nurseries, schools, colleges, universities, hospitals, care homes, large and small retailers, cafes, restaurants, staff canteens and all other food providers in Scotland – will commit to procuring and providing sustainable, healthy and local food and be supported to do so through clear, effective national and local policies and related activities.”***

***4. How would your life be better? What does being a Good Food Nation mean in your locality?***

***As a diverse partnership with tens of thousands of employees, stakeholders and consumers, our work would be impacted in many different ways and we will need to prioritise resources to achieve this vision fully. There are competing demands for our limited budgets and recent cuts across the public sector, including within food procurement and catering services, which means the vision is potentially becoming harder to achieve.***

***However, we agree that, provided there is sufficient budget and other necessary levers are in place, Scotland becoming a Good Food Nation would greatly support many of our efforts which are principally concerned with providing a high level of service across our catering and food related operations for the maximum benefit of our consumers, stakeholders and society as a whole.***

***5. Are there any other essential steps we need to take before setting out on this journey?***

***We have already begun this journey. We hope that strong national and local policies will follow, creating a level playing field for the many local policies and activities needed regarding food and drink procurement and provision.***

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

1. ***By observing and listening to all those with the knowledge and experience to understand what barriers remain to prevent Scotland becoming a Good Food Nation.***
2. ***By using this knowledge to implement policies and to address and remove policy and operational conflicts that will make a positive difference, and challenge structures that restrict progress.***
3. ***Recommendations from the Food Commission should be heard at the highest levels of government.***
4. ***The Food Commission should report publicly on a regular basis against clear targets.***
5. ***Local groups, including groups such as the Edinburgh Food for Life Partnership, should be invited to submit information to the Food Commission, either in writing or face-to-face based on our learning and the information we have gathered about the challenges we face when trying to implement procurement and catering systems in the public sector that are healthy, sustainable and better for Scotland’s economy.***
6. ***The Food Commission should, at an early stage, review the substantial body of Scottish Government and other key stakeholder research produced to date. It should use this information to ensure we learn from work already done and draw out recommendations / action plans to improve Scotland’s relationship with food and drink in terms of sustainability, health, local economic benefits etc.***

***7. In what areas should indicators be set to check we are on track towards our goals?***

***We suggest the following areas should be included in a list of indicators, and have offered a non-exhaustive selection of examples within each as to what might specifically be measured:***

* ***Health and wellbeing - improving over time including reduced levels of obesity and greater consumption of fruit, vegetables and other nutritious foods such as fresh meat, milk, bread and cheese.***
* ***Public attitudes and awareness – e.g. towards fresh, local food - increasing over time.***
* ***Public procurement - uptake of Food for Life Catering Mark (which encourages freshly prepared, seasonal food which is free from additives and increasingly local and ethical.***

***Environmental sustainability – water, land use and emissions reducing over time, greater levels of biodiversity, certified sustainable seafood and reduced waste throughout the supply chain.***

***8. What are your views on the different approaches that could be taken to help us become a Good Food Nation?***

***We believe that becoming a Good Food Nation will necessarily involve multiple activities across many sectors of society to achieve the following societal needs:***

* ***Scottish farmers and growers need reliable markets for their produce along with further encouragement and incentives if they are to produce a greater variety of food in a sustainable way – to help us feed ourselves.***
* ***Scottish producers, suppliers and distributors need a healthy margin to operate.***
* ***Scottish retailers need to know there is public demand for Scottish produce and be persuaded / required to work more closely with Scottish producers.***
* ***Scottish communities need to be convinced of the benefits of eating healthy, Scottish produce over and above convenience food.***
* ***Scottish high streets need to be regenerated, so they are places that support, rather than act against, good food provision.***
* ***Scottish families need the knowledge and skills to understand both why it is important and also how to cook fresh, healthy food for adults and children alike.***
* ***The Scottish public sector needs the resources and procurement guidance to enable the purchase of Scottish, sustainable produce even where the upfront cost is greater.***
* ***Investment is needed to ensure local supply chains have the infrastructure required to service their local area. For example, loans for on-farm storage and/or packing equipment which would allow more farmers to directly supply caterers, community co-ops and peoples’ homes.***

***From this list, and bearing in mind the three elements of success identified in section 2 of this response, we have identified three overarching factors we consider as being most vital to success:***

1. ***Strong government policy and, where necessary, funding/investment across all relevant areas.***
2. ***Widespread publicity using all available mechanisms with clear and consistent messaging to gain support for the changes needed across Scotland.***
3. ***A powerful Food Commission, in line with our response to section 6 above, enabled to implement change and act on recommendations.***

***We believe these will best ensure that, as mentioned in the document, healthy, sustainable and delicious food is both “accessible to everyone” and more likely to be chosen.***

***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?***

***We believe the focus is correct with the exception of “Continued economic growth” which we believe should be changed to: “Sustainable development - aligning social, environmental and economic growth.”***

***10. Which other areas would you prioritise?***

***In addition to the emphasis on food as an economic driver, we would wish to see more consideration given to food as a way of developing our communities though further exploration of aspects of food poverty including addressing health inequalities, developing alternatives to food banks, encouraging more new sustainable food start-ups (whether community or business based) and ensuring more resilience and sustainability in the food system.***

***We feel that there is a need for a more joined-up approach and greater investment of resources into encouraging better food choices. The Individual, Social and Material (ISM) behaviour change framework used in other areas may be of use here.***

***We would also prioritise support for the diversification of food as an export commodity to capitalise on healthier products.***

***11. What other steps toward achieving a Good Food Nation would you recommend?***

***We would wish to see consideration of food in environmental and climate change related policies, from which it is generally absent despite food being responsible for a significant proportion of GHG emissions.***

***We believe in a need for real levers to improve diet issues and restrict market of unhealthy food choices (e.g. tax, planning, competition, business rates policies) that favour sustainable food production to provide incentives and make real change.***

***We would like to see the Scottish Government be much more explicit about the public benefits that are expected to result from public money going into primary production and rural development.***

***We feel that debates on environmental issues associated with food and on food poverty and community health need to be brought together in order to generate sustainable solutions.***

***12. What else should be considered?***

***While we agree with the proposal to appoint a Good Food Commission, we believe in the need for greater clarity with regard to its broad priorities and for greater transparency in the appointment process and in the public availability of its minutes and reports. Members should be drawn from the health, primary production, processing and catering, environmental, economic development, trade, retail, education, local authority and community development sectors.***

***An early focus should be on determining priorities and indicators of progress, along with aligning government policies. National planning policies and local development plans would need to give due consideration to issues relating to food production, retail and distribution including making land available for both commercial and community based growing in order to supply our cities and urban areas with more local food. Space would need to be made available for local value-added processing and the development of a more diverse retail offering. This may require further land reform as well as more sympathetic planning policies.***

***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?***

***The Edinburgh Food for Life Partnership (EFFLP) was established in 2012, and has four central aims, which we will continue to work towards over at least the next 12 months:***

* ***Identify and tackle barriers to providing increased levels of seasonal, fresh, local, higher welfare and organic food within public sector catering.***
* ***Achieve the Food for Life Catering Mark award in selected sites.***
* ***Engage children and young people, parents, patients, students and staff to increase knowledge and understanding of where their food comes from.***
* ***Evaluate the measurable impacts of the changes made.***

***Some of the partners’ achievements through the EFFLP are listed below, along with partner-specific information about other initiatives that will support Scotland becoming a Good Food Nation.***

***City of Edinburgh Council (CEC):***

* ***In December 2013, Clovenstone House became the first care home in Scotland to achieve the Food for Life Catering Mark (FFLCM), at bronze. This was a significant achievement given the variety of dietary needs within the care home. In July 2014 two further care homes within CEC achieved the award, Marionville Court and Ferrylee, using much of the learning from Clovenstone House to adapt their recipes, products and information provided to residents to meet criteria.***
* ***In June 2013 Currie Community High School became the second High School in Scotland to achieve the bronze FFLCM award, at the same time as Buckstone Primary School. Both schools continue to prioritise food education and catering services and are working towards the gold FFLCM award.***
* ***CEC are working to rollout the FFLCM at bronze to all schools (primary, secondary and special schools), which would be a Scottish first. This work has been embedded into plans for Free School Meals for P1-3 pupils, testament to the value placed by CEC on providing a sustainable, healthy hot school meal for its pupils.***
* ***In addition to the Catering Mark, Soil Association Scotland is also beginning the rollout of the Food for Life Scotland Education Framework. This is being piloted during the 2014-2015 academic year in selected ‘pathfinder’ schools across nine Scottish local authorities, including up to six ‘pathfinder’ schools within the City of Edinburgh, which will currently include Davidson’s Mains Primary School and Currie Community High School.***
* ***These six schools will be provided with advice and support from Soil Association Scotland staff to implement, monitor, and evaluate a Framework which is designed to empower and enable a holistic, whole-school approach to food. Comprising four key areas for action, namely Culture, Catering, Curriculum and Community, and three levels of suggested action points for each of these areas, the Food for Life Education Framework will provide a logical, progressive structure which enables schools to truly embed a ‘good food for all’ culture which is designed to contribute to their ‘***[***totality of experience’***](http://www.educationscotland.gov.uk/thecurriculum/whatiscurriculumforexcellence/understandingthecurriculumasawhole/index.asp)***.***
* ***A Catering Improvement Programme (CIP) is also underway within City of Edinburgh Council, drawing on expertise both within and beyond the council (including Soil Association Scotland). The CIP’s work is focussing on how to provide high quality Free School Meals to P1-P3 pupils (plus all who are eligible) from January 2015, as well as ensure the school’s catering service aligns with Better Eating Better Learning, and Beyond the School Gate guidance.***

***NHS Lothian:***

* ***Soil Association Scotland and NHS Lothian have explored opportunities for achieving the Food for Life Catering Mark within St John’s Hospital and, this work has provided a variety of important insights into the challenges facing the health service when attempting to procure more local produce within its catering service, particularly meat.***
* ***Meetings have been held with Senior Management as well as National Procurement to discuss these issues and work out a way forward.***
* ***Soil Association Scotland has also been invited onto the Catering Strategy Steering Board within NHS Lothian, and is working collaboratively to ensure Food for Life principles and values are embedded into the plans. This is also an opportunity for the Soil Association to understand the issues relating to food and catering services facing the NHS and therefore be in a stronger position to positively influence national policy.***

***University of Edinburgh:***

* ***The University of Edinburgh became the first University in Scotland to achieve the bronze Catering Mark award in December 2012, for the food served to students in Pollock Halls of Residence. In December 2013 the award was renewed and expanded to include the University’s commercial catering outlets across the city, meaning many more students, and non-students benefit from food that meets the standards.***
* ***Food for Life Scotland has also held several events at Pollock Halls, talking to students about the award and promoting Food for Life Scotland’s values around seasonality, animal welfare and local sourcing.***
* ***Pollock Halls now has a “cook school” on-site, helping to train students to cook for themselves once they leave campus.***
* ***The University of Edinburgh is working towards a Sustainable Food Policy, which will help ensure its food procurement and provision fits the university’s wider policy for sustainability and social responsibility. This has led to the University being shortlisted for a Green Gown award.***

***14. How did you hear about this Discussion Document?***

***Soil Association Scotland’s Director (Laura Stewart) attended the launch with Richard Lochhead on behalf of the Edinburgh Food for Life Partnership along with relevant City of Edinburgh Council school pupils and staff who are working with Food for Life Scotland and whose schools have achieved the Food for Life Catering Mark.***